

Oriel

Planning Statement

October 2020

File: ORL-INF-XX-XX-RP-PL-110-Planning Statement



Oriel
Creating the centre for
advancing eye health



Moorfields
Eye Hospital
NHS Foundation Trust



Moorfields
Eye Charity



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Moorfields
Eye Hospital
NHS Foundation Trust



white



Moorfields
Eye Charity

KMHeritage

AECOM

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Penoyre
& Prasad
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gia
CHARTERED SURVEYORS

BURO HAPPOLD



GT GARDINER
& THEOBALD

C/M/S

Law . Tax

Jones Lang LaSalle Incorporated

Oriel – Planning Statement

On behalf of Moorfields Eye Hospital NHS Foundation Trust, UCL Institute of Ophthalmology and Moorfields Eye Charity

Planning Statement

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Executive Summary

Introduction

- i. This Planning Statement has been prepared by the Jones Lang LaSalle ('JLL') Planning Team on behalf of Moorfields Eye Hospital NHS Foundation Trust ('Moorfields'), University College London ('UCL') Institute of Ophthalmology ('IoO') and Moorfields Eye Charity ('MEC') ('the Applicant') to support an application for Full Planning Permission for the proposed development at Plot 1 St Pancras Hospital, 4 St Pancras Way, London NW1 0PE (hereafter referred to as 'the site' or 'SPH').
- ii. The site is located within the administrative boundary of the London Borough of Camden ('LBC').
- iii. This application is for the following description of development:

“Demolition of one and two storey hospital buildings (Ash House, Bloomsbury Day Hospital, the Camley Centre, Jules Thorn Day Hospital, Kitchen Building and the Post Room & Former Mortuary) and construction of a part seven, part ten storey purpose-built eyecare, medical research and educational facility for Moorfields Eye Hospital, the UCL Institute of Ophthalmology and Moorfields Eye Charity.

New building to comprise a mixture of the following uses: 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, admin space and plant space.”

- iv. The proposals have been informed by pre-application discussions since February 2019 with planning, design and highways officers from the LBC, the Greater London Authority ('GLA') and Camden's Design Review Panel ('DRP').
- v. There has also been engagement with local politicians including the leader of the Council, Cabinet Members and the local Ward Councillors.
- vi. Two public virtual discussion events were held on Tuesday 18th August and Monday 24th August 2020. These enabled local residents and the business community to review the proposed development during its design evolution and provide feedback, which was subsequently incorporated.
- vii. The purpose of this Planning Statement is to set out the case for granting planning permission based on the scheme's compliance with national, strategic and local planning policies and the material economic, environmental and community benefits that the scheme delivers.

EIA

- viii. An EIA Screening Request was made to LBC on 19th December 2019. This request set out that the proposed development is unlikely to give rise to any significant environmental effects that would require the submission of an Environmental Statement. At the time of writing LBC had not issued a formal response to this Screening Request.

The Case for Granting Planning Permission

- ix. The site is currently in institutional use by St Pancras Hospital. This application relates to the north-western corner of the wider SPH site, it contains 6 low rise and poor-quality buildings.
- x. The site is part of the Camley Street area and sits within the Knowledge Quarter.
- xi. The site is allocated within LBC's adopted Site Allocation Plan (ref. Site 6: 4 St Pancras Way (St Pancras Hospital)) for mixed-use development comprising health and medical related uses and/or permanent (C3) housing and affordable housing and other complementary uses. Within the LBC draft Site Allocations Local Plan Document, Policy CSP5 allocates the site for health, self-contained homes and employment (knowledge quarter uses). Further policy guidance for the site is contained with the Canalside to Camley Street Draft Supplementary Planning Document (July 2020).
- xii. The site does not contain any listed buildings, but it is located within the Kings Cross/St Pancras Conservation Area and immediately adjacent to and contiguous with the linear Regent's Canal Conservation Area to the north and east.
- xiii. The proposal seeks the demolition of the existing buildings and the redevelopment of the site for the construction of a single building comprising part seven, part ten storey (including ground level and lower ground level, plus enclosed plant at roof level).
- xiv. The proposal will provide a purpose-built eyecare, research and education centre for Moorfields, UCL IoO and MEC, which will continue the development of the Knowledge Quarter.
- xv. The proposed development meets national, strategic and local planning policy priorities to deliver a high-quality mixed-use development and is in accordance with the adopted development plan.

Scheme Benefits

- xvi. In presenting an assessment of the overall planning policy case and in addressing the planning balance, it is necessary to consider the planning and community benefits of the proposed development.
- xvii. The proposal will deliver a landmark scheme for the Knowledge Quarter. The scheme constitutes an appropriate re-use of this brownfield site as well as delivering environmental, social and economic benefits to the local residents and businesses.

Environmental

- **Use of Previously Developed Land** – In conformity with sustainable planning principles, this development is on previously developed land.
- **Optimisation of Underutilised Land** – The proposal optimises the use of the site through the sensitive addition of new floorspace.
- **World Class Design and Architecture** – The proposals are designed by a leading architectural practice and will deliver high quality design, architecture and layout, utilising innovative materials.
- **Provision of Sustainable Technologies** – Provision of sustainable technologies and renewable energy to drive environmental performance, including 864 sqm of roof mounted photovoltaic (PV) panels, a ground source heat pump system and an air source heat pump system.

- **Highly Accessible Location** – The site is accessible by all modes of transport and has the highest achievable Public Transport Accessibility Level (PTAL) of 6b (measured on a scale of 0 to 6b, where 6b is the highest). The site is in close proximity to King’s Cross, St Pancras, Euston and Mornington Crescent Stations, providing excellent connections to large parts of the UK as well as access to six London Underground Lines and the Overground.
- **Promotion of Sustainable Transport** – In line with LBC’s policy on parking and the highly sustainable location of the site, the proposed development will have no car parking (aside from disabled parking). This will have benefits for the air quality and traffic congestion in the surrounding area.
- **Cycling** – Providing 502 cycle spaces and creating excellent showering, changing and storage facilities to encourage workers to cycle to improve health and well-being and reduce congestion and air pollution.
- **Biodiversity Net Gain** – The existing site is of low ecological value due to the limited green habitat within the site, the baseline biodiversity value is 0.47 area-based units. A high-quality hard and soft landscaping scheme is proposed which will improve the biodiversity of the site. The landscaping proposals will result in a gain of 0.11 biodiversity units, equating to a 23.16% increase.

Social/Community

- **State-of-the-Art Specialist Building for Ophthalmology** – Oriel is a partnership between Moorfields, MEC and UCL IoO to build a new shared home that will enable the partners unprecedented quality of clinical, research and education outcomes. The new facility will offer the best experience for patients and staff, as well as speed up the development of new research and treatments.
- **Efficient Use of Resources and Enhanced Collaboration** – The proposals seek to co-locate Moorfields Hospital at City Road and the UCL IoO into a purpose built, integrated facility that will bring together clinical care, research and education expertise. The existing buildings are more than 125 years old and are no longer suited to the provision of 21st-Century clinical care, research or education.
- **Public Role of the Building and Interactions with Local, Regional and National Communities-** The proposals will help to contribute to the local community of LBC, London and beyond by providing the following: a dedicated exhibition space, static displays throughout the building, local school engagement and a digital offering to reach more distant communities.
- **Improved Internal Wayfinding** – Feedback from patients and carers is very positive about the clinical care received at Moorfields but does include concerns about the difficulties experienced when navigating through the building, describing the layout of the City Road buildings as confusing, the waiting areas as overcrowded with insufficient seating and poor levels of natural light. The interior of the new building is designed for everyone, using materials, colour, tactility and technology to aid wayfinding and navigation around the building.

- **Roof Garden** – At sixth floor level, the staff and students will have access to a south facing roof garden with spectacular views over London.
- **Reducing Crime** – The scheme will introduce active ground floor frontages, increasing the vibrancy of the area and natural surveillance to reduce crime and the opportunities for committing crime.
- **Enhanced Safety and Security** – The scheme has been designed in accordance with ‘Secured by Design’ principles.
- **Dedicated drop-off / pick-up** – A private patient transport drop-off and pick-up is proposed in a new layby on St Pancras Way, close to the south-west entrance and the A&E department. This will accommodate anyone unable to use public transport.
- **On-site Servicing** – Servicing of the building will take place to the north off Granary Street, away from public entrances. The design accommodates a generous delivery yard within the building which provides a level ground for vehicles. The yard has been carefully designed and tracked to ensure all vehicular movements into and out of the building are forward facing.
- **Improved Public Realm** – Improvements are proposed to the local environment, this includes replacing and upgrading the immediate public realm with a high-quality hard and soft landscaping proposal. The removal of the existing high brick perimeter wall will enhance permeability across the site and provide greater connections to the Canal, St Pancras Gardens and surrounding sites. The lower ground floor and ground floor have been designed to create active frontages and a lively public realm. The atrium forms a new internal public realm at the heart of the building, rising up through the centre of the atrium is ‘the Oriel’, a rising stack of floor plates containing the main public lifts and stairs, connecting to the departments via generous bridges at each level.
- **Moorfields Eye Charity** – MEC provides financial support to Moorfields, supporting building projects, new equipment, pioneering research, training opportunities, development of Moorfields staff to ensure the care they provide is outstanding, public education about eye health and improving the experience for Moorfields patients and their families.

Economic

- **Viability** – The proposed development will ensure a viable, long-term future for the site.
- **World Leaders in Ophthalmic Research and Education** – The provision of this new facility will strengthen the existing UK and International impact and profile of Moorfields and UCL IoO. Together, they provide globally recognised research, excellent education and outstanding clinical care. The world-leading collaboration between the Oriel Partners will enable the largest ophthalmic research programmes in the world and cutting-edge studies into the care of eye disorders and diseases. Moorfields and UCL IoO have a long history of expertise in eye care, research and education – *they are the only hospital-university partnership that is ranked number one globally in any medical field.*

- **Job Creation through the Demolition and Construction Phase** – Considering the total investment and build cost of the project¹, the total full-time jobs generated per year direct would be 512. This would amount to some 2,231 contractors being employed at the site based on indicative multipliers. The generation of 512 full time jobs per year would contribute an additional £23.5 million to the economy per year of the development, or £79.9 million over the full duration of the construction period².
- **Job Creation through the Occupation Phase** – The provision of health and research related jobs and 10-14 Full Time Equivalent Retail Jobs.
- **Training Opportunities** – The applicant is committed to working with their contractors, suppliers and occupiers to get the most from this development. As part of the proposed development, opportunities to provide training, apprenticeships and work experience in a range of demolition and construction trades will be secured by the Section 106. For example, there would be opportunities for local young people to gain National Vocational Qualification (NVQ) Level 2 and Level 3 training and practical experience in a range of different demolition and construction, and engineering trades.
- **Supporting Camden STEAM** – The applicant is keen to support the ambitions of Camden’s STEAM Commission, and its role in developing creative, digital and scientific career opportunities within the Borough.
- **Significant Investment in Health Care Sector** – The proposals represent a significant financial investment in the health sector benefiting LBC, London and UK generally.
- **Investment in London’s Knowledge Quarter** – The site sits within London’s Knowledge Quarter, an area which has one of the highest densities of knowledge based, cultural and scientific businesses of anywhere in the world. The proposed facility will be a welcome contribution to this existing cluster.
- **Regeneration of the Local Economy** – The local economy will benefit from the ‘ripple effect’, from new employee expenditure on local goods and services.
- **Investment in Camden** – This proposal supports the continued growth of the London economy and will generate significant financial investment in Camden.
- **Business Rates** – There will be a significant contribution to business rates to Camden. It is estimated that once operational, the proposed development could generate approximately £2.76 million (gross) in business rates. This is based on LBC’s average rateable value (per sqm)³ and assumes application of the charitable rate relief of 80%⁴.

¹ Approximate build cost of £260 million over 41 months

² <https://www.randstad.co.uk/about-us/industry-insight/construction-pay-soars-brexodus-skills-shortage-bites/>

³ Valuation Office Agency (VAO) LBC Average Rateable Value of £297 per sqm

⁴ Gov.UK, Charities and community amateur sports clubs can apply for charitable rate relief of up to 80% if a property is used for charitable purposes.

1. Introduction

- 1.1 This Planning Statement has been prepared by the Jones Lang LaSalle ('JLL') Planning Team on behalf of Moorfields Eye Hospital NHS Foundation Trust ('Moorfields'), University College London ('UCL') Institute of Ophthalmology ('IoO') and Moorfields Eye Charity ('MEC') ('the Applicant') to support an application for Full Planning Permission for the proposed development at Plot 1 St Pancras Hospital, 4 St Pancras Way, London NW1 0PE (hereafter referred to as 'the site' or 'SPH').
- 1.2 The site is located within the administrative boundary of the London Borough of Camden ('LBC').
- 1.3 This Planning Statement is submitted in support of the application and must be considered alongside the other documents, set out below, forming and supporting the planning application.

What is Oriel?

- 1.4 Oriel is a partnership between three parties; Moorfields, UCL IoO and MEC, who have been working together since 2012 to develop a new, purpose-built centre of excellence for eye care, research and education.

Moorfields Eye Hospital

- 1.5 Moorfields is the leading provider of eye health services in the UK and an international centre of excellence for ophthalmic research and education. Moorfields' reputation for providing the highest quality of ophthalmic care has developed over 200 years. Moorfields, with its partner UCL, continues to be at the forefront of education and research realising effective and efficient translation into clinical treatment. The trust's 2,300 staff are committed to sustaining and building on the pioneering legacy and ensuring Moorfields remains at the cutting edge of developments in ophthalmology.
- 1.6 The trust's main focus is the treatment and care of NHS patients with a wide range of eye problems, from common complaints to rare conditions that require treatment not available elsewhere in the UK. The volume and variety of conditions treated by Moorfields clinicians means that many have a unique range of skills and knowledge.
- 1.7 Moorfields treats people in 30 locations in and around London, enabling provision of first-class care and treatment in the community, closer to where people live and work. The City Road site is the central site focusing on delivery of Moorfields' most specialist and complex clinical services. The central site is supported by a portfolio of district hubs, local surgical centres and community clinics and other partnerships and networks.

UCL IoO

- 1.8 The UCL IoO conducts cutting-edge science, attracting researchers and academics of the highest international calibre. It has a reputation for outstanding research in fundamental and applied vision science and eye disease with key strengths in visual processing, the psychology of vision, molecular and cellular basis of eye disease, translational and experimental ophthalmology and, with Moorfields, clinical studies. Education and training are also crucial aspects of the work of both UCL and Moorfields with many of the

current key figures in vision, eye research and ophthalmology having spent time lecturing at one or both organisations.

Moorfields Eye Charity

- 1.9 MEC is a new organisation, founded in 2011 and formed through a merger of various charitable and philanthropic activities connected to Moorfields. The merger was completed in April 2017. The principal way MEC support Moorfields is by providing financial support, through grant-making (to Moorfields and the UCL IoO). Its philanthropic support covers building projects, new equipment, pioneering research, training of current and future healthcare professionals, development of Moorfields staff to ensure the care they provide is outstanding, public education about eye health, and improving the experience for Moorfields patients and their families.

Partnership Principles

- 1.10 The relationship between Moorfields and UCL with the support of MEC and the IoO is symbiotic. The parties work together to improve the experience for their patients, staff and students across a whole range of activities. The principles underlying the partnership are as follows:

- **Committed to collaborate** - The partners will continuously evaluate the impact of their collaboration, reflecting on lessons learnt to continuously improve outcomes for all.
- **Effective and sustainable** - The partnership will operate in a way that delivers high quality education, research and clinical services within a sustainable system.
- **Harmonised and aligned** - The partnership's work will support a culture of openness, integrity and trust at all levels.
- **Joint strategy** - The partnership will have a shared ambition with long term aims and measurable plans for achieving them.
- **Autonomous and independent** - The partnership recognises that members will have independent objectives and respects the requirement to act autonomously outside of the joint strategy.
- **Flexible, resourceful and innovative** - The partners will proactively adapt and respond to emerging circumstances, embracing change while maximising effectiveness and productivity.

- 1.11 The principles are underpinned by a commitment to education, knowledge sharing and training tomorrow's experts.

The Vision for Oriel

- 1.12 The vision for the new integrated facility is:

- To create an environment for innovation to flourish, inspiring advances to improve people's sight.
- To develop a brand-new facility to enable the Partners to deliver their objectives.
- To encourage collaboration between clinicians and researchers, which in turn will enable greater innovation in delivering optimal care, research and education.

- To harness the collective power of our staff, students and patients to improve people's sight.

The Objectives for Oriel

1.13 The objectives below describe what the partners will need to do to realise the vision:

1. Creating the best possible patient experience.
2. Attracting and empowering the best people.
3. Inventing and innovating together to be at the leading edge.
4. Educating people to be the very best.
5. Driving efficiency and effectiveness.

Development Context

1.14 The existing Moorfields Eye Hospital at City Road ('Moorfields at City Road') currently provides comprehensive general and specialist outpatient, diagnostic and surgical services for local people, as well as those from further afield who require more specialist treatment. It also provides emergency surgery, a 24-hour Accident and Emergency ('A&E') dealing exclusively with urgent eye problems, and research and education capability. Services are delivered from the main hospital, a children's centre and private facilities. The UCL City Road Campus is also home to the Moorfields research partners.

1.15 The existing facilities are all located in adjacent, but separate, buildings and are no longer considered fit for purpose, and a new facility is considered necessary for the following reasons:

- The existing buildings at City Road are over 125 years old, and are no longer suited to the provision of 21st Century clinical care, research and education;
- The existing infrastructure is becoming increasingly difficult and expensive to maintain;
- The configuration of the existing buildings offers little scope for true integration between clinical, research, and teaching elements of the work carried out; and
- Intermediate refurbishment works help to improve the environment for patients and staff but are no substitute for purpose-built accommodation.

1.16 Therefore, the proposed development at the SPH site seeks to co-locate the existing Moorfields at City Road and the UCL IoO services from Bath Street, into a single, bespoke building that will bring together clinical care, research and education expertise in one flexible integrated facility. The Oriel partners have entered into a formal Option Agreement, subject to a number of certain conditions, which gives them the ability to acquire up to 2 acres of the SPH site on pre-agreed terms. Following completion of the development proposal, it is envisaged that Moorfields will be the owner of the site and UCL will be granted a Long Leasehold ('Virtual Freehold') interest in their component of the site.

1.17 The entire SPH 5-acre site is owned freehold by Camden and Islington NHS Foundation Trust ('the C&I Trust'), who deliver a range of mental health services. Whilst still operating a range of services from the site, it has been identified in the NHS's North Central London Sustainability and Transformation Plan as the

proposed location of new health and research facilities for a number of years. Indeed, the C&I Trust are in the process of disposing of the site to raise funds to move inpatient facilities to a new, purpose-built facility next to the existing Highgate Mental health Centre and the Whittington Hospital in Archway (ref. P2020/0761/LBC) and develop integrated community health centres at Lowther Road, Greenland Road, St Pancras and in North West Camden In addition, the funds will be used to support the move of Central and North West London NHS Foundation Trust’s (‘CNWL’) currently located in the South Wing to Royal College Street (ref. 2020/0728/P), and other services off site.

1.18 King’s Cross Central Limited Partnership (‘KCCLP’) is the development partner of the C&I Trust and they intend to submit a planning application for the remaining 3 acres of the SPH site in 2021. The design is at an early stage; however it is currently envisaged that the development will retain the existing Chapel, Gatehouse and Workhouse buildings. The buildings to the east of the site would be demolished and replaced by new buildings. It is currently anticipated that planning permission will be sought for a mix of uses including employment, residential and retail/food and drink, as well as some healthcare and office facilities for the C&I Trust. The Oriel team have engaged and will continue to engage with KCCLP to ensure the Oriel proposals are integrated and coordinated.

1.19 The SPH site is considered suitable as the location for the Oriel for the following reasons:

- It is close to the existing Moorfields City Road site, which will make the move easier for existing patients and staff;
- The area is undergoing extensive regeneration, which means that there is land available on which to build;
- The area is a major transport hub, providing easy access from across London and beyond; and
- The Euston/St Pancras area sits within the Knowledge Quarter, which contains one of the highest densities of knowledge based, cultural and scientific businesses anywhere in the world. This includes a cluster of other important health and health research partners, such as UCL Hospital, Great Ormond Street Hospital, the main UCL campus, the Francis Crick Institute and eye charities such as Guide Dogs and the Royal National Institute of Blind People (‘RNIB’).

Description of Development

1.20 This application is for the following description of development:

“Demolition of one and two storey hospital buildings (Ash House, Bloomsbury Day Hospital, the Camley Centre, Jules Thorn Day Hospital, Kitchen Building and the Post Room & Former Mortuary) and construction of a part seven, part ten storey purpose-built eyecare, research and educational centre for Moorfields Eye Hospital, the UCL Institute of Ophthalmology and Moorfields Eye Charity.

New building to comprise a mixture of the following uses: clinical, research and education purposes, including accident and emergency (A&E) department, outpatients, operating theatres, research areas, education space, café and retail areas, facilities management, admin space and plant space.”

Planning Statement

- 1.21 The purpose of this Planning Statement is to assess the proposed development against the relevant planning policy framework, to consider key material considerations and to demonstrate why Planning Permission should be granted.
- 1.22 The planning submission is formed of a comprehensive package of supporting information. Reference is made in the Planning Statement, where necessary, to the conclusions and details contained within these documents.
- 1.23 This Statement adopts the following structure:
- Section 2 describes the site and surrounding area;
 - Section 3 describes the planning history;
 - Section 4 summarises the pre-application consultation undertaken;
 - Section 5 sets out the proposed development;
 - Section 6 summarises the relevant planning policy context;
 - Section 7 sets out the case for planning permission;
 - Section 8 provides an overview of planning gain in relation to the proposal; and
 - Section 9 concludes, setting out the benefits of the proposal.

Format of Submission

- 1.24 This application is formed and supported by the following documents:

| Document | Author |
|--|--------|
| Covering Letter | JLL |
| Completed Application Form | JLL |
| Certificate of Ownership and Agricultural Holdings | JLL |
| Formal Notices | JLL |
| CIL Form | JLL |
| Site Location Plan (@1:1250) | P&P |
| Schedule of Application Drawings | P&P |
| Application Drawings | P&P |
| Design and Access Statement (including Design Principles Document) | P&P |
| Planning Statement (including Draft Heads of Terms) | JLL |
| Air Quality Assessment | AECOM |
| Arboricultural Impact Assessment (including Outline Arboricultural Method Statement) | AECOM |
| Archaeological Desk Based Assessment | AECOM |
| Basement Impact Assessment | AECOM |
| Bat Surveys Report | AECOM |
| Biodiversity Net Gain Assessment | AECOM |
| Circular Economy Statement | AECOM |
| Daylight, Sunlight and Overshadowing Assessment | AECOM |

| | |
|--|--------------------------------------|
| Delivery and Servicing Plan | AECOM |
| Drainage and Sustainable Urban Drainage (SuDS) Strategy | AECOM |
| Energy Strategy | AECOM |
| External Lighting Assessment | AECOM |
| Fire Safety Strategy | AECOM |
| Flood Risk Assessment and Drainage Strategy | AECOM |
| Framework Travel Plan | AECOM |
| Landscaping Design Report | White Arkitekter |
| Noise and Vibration Impact Assessment | AECOM |
| Operational Recycling and Waste Management Plan | AECOM |
| Outline Construction Logistics Plan | AECOM |
| Outline Construction Management Plan | AECOM |
| Phase 1 Geotechnical and Geoenvironmental Desk Study Report | AECOM |
| Preliminary Ecological Appraisal | AECOM |
| Social, Economic and Health Impact Report (including Economic Impact Assessment, Employment and Skills Strategy, Social Impact Assessment, Health Impact Assessment, Equalities Impact Assessment and Academic Needs Assessment) | JLL |
| Statement of Community Involvement | London Communications Agency ('LCA') |
| Sustainability Statement (including BREEAM Pre-Assessment) | AECOM |
| Townscape, Heritage and Visual Impact Assessment ('THVIA') | KM Heritage |
| Transport Assessment (including Stage 1 Road Safety Audit) | AECOM |
| Tree Survey Report | AECOM |
| Wind Microclimate Assessment | BRE |

- 1.25 Please note that the planning application fee of £105,960 has been paid by electronic transfer to Planning Portal.
- 1.26 An EIA Screening Request was made to LBC on 19th December 2019. This request set out that the proposed development is unlikely to give rise to any significant environmental effects that would require the submission of an Environmental Statement. At the time of writing LBC has not issued a formal response to this Screening Request.

2. The Site and Surroundings

2.1 This section describes the site and surroundings to set the context for the development proposals.

Site Description

2.2 The site is located within the administrative boundary of the LBC.

2.3 The entire SPH 5-acre site is owned freehold by the C&I Trust. The Oriel partners have entered into a formal Option Agreement, subject to a number of certain conditions, which gives them the ability to acquire up to 2 acres of the SPH site on pre-agreed terms.

2.4 The Oriel application red line boundary (as shown on **Figure 2.1**) is 1.33 hectares (3.29 acres). This includes the intended Oriel site ownership as well as highways and site access points that will be considered as part of the application. It comprises a broadly rectangular plot at the north western corner of the wider SPH site, located within the St Pancras Ward of the Borough. Existing ground levels on the site generally fall from north east to south west, with the high point being 23.00m AOD in the north east of the Site and a low point of 19.2m AOD to the south west.

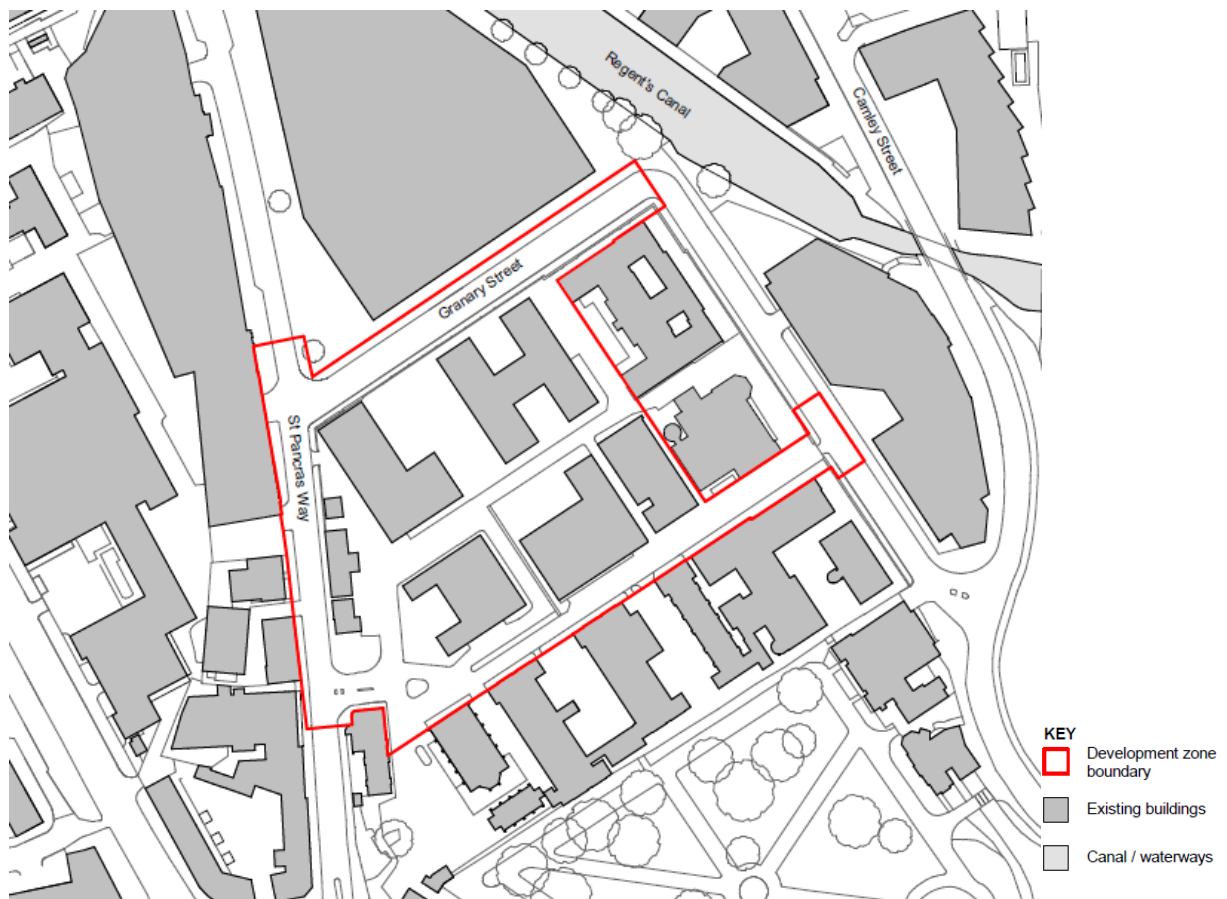


Figure 2.1: Extract from Site Location Plan (Drawing Number: ORL-PPA-XX-XX-DR-A-20100 Rev P4)

2.5 There is a high boundary wall that surrounds the entire SPH site which gives a compressed sense of space that is impermeable to the public. The SPH site is bounded by Granary Street to the North and East, St

Pancras Gardens to the South and St Pancras Way (A5202) to the West. To the east of the site is Regents canal, which provides a link from the Paddington Arm of the Grand Union Canal, 500m north-west of Paddington Basin in the west, to the Limehouse Basin and the River Thames in east London. Camden High Street is approximately 800m to the west.

Existing Buildings

2.6 All of the buildings on the SPH site are in institutional (Use Class D1) use as a hospital. The Oriel site is made up of a group of 6 buildings which are illustrated in **Figure 2.2** and **Table 2.1**. These comprise:

1. Ash House;
2. Bloomsbury Day Hospital;
3. The Camley Centre;
4. Jules Thorn Day Hospital;
5. Kitchen Building; and
6. Post Room & Former Mortuary.

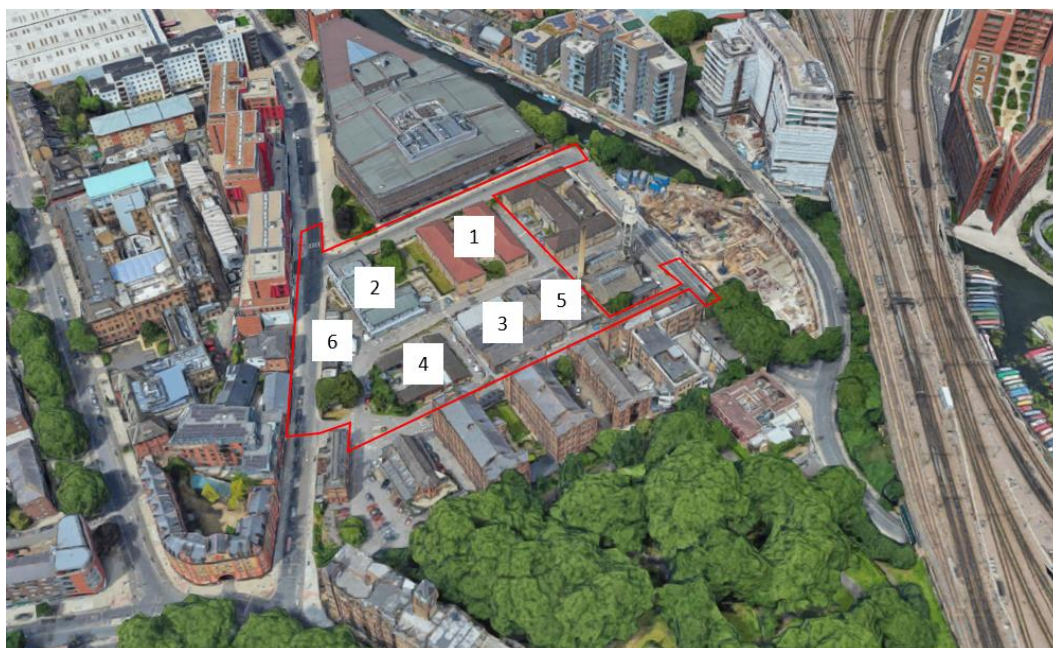



Figure 2.2: Existing Buildings (Source: Google Maps)

| Building Name | Image | Description |
|---------------|---|---|
| Ash House |  | This is a masonry clad 2 storey H-shaped modern building built in the 1990s. It has a brick wall, clay tile roof and wooden soffits. It currently contains the SPH Montague Ward and Sutherland Ward. |

Bloomsbury Day Hospital



Located to the North-West of the site, the building looks to be formed from prefabricated modules stacked 2 stories high, it was built circa 1972. This building is L shape in plan form and has a ground floor and a smaller first floor with a flat bitumen roof. Around the base of the building is a brickwork wall up to the base of the ground floor windows. To the east and west of the building are masonry retaining walls around the ramps and walkways. Foundations are likely to be pad foundations, however, if the clay layer is too deep or too weak then piles may have been used. It is used as a GP surgery and a Recovery College.

The Camley Centre



This consists of three connected brick built Victorian buildings with pitched slate roofs (approximate date of construction 1890). The basement contains active offices and is well-lit by security lights on the outside. The ground floor contains the Camley Centre and attached to the north is a single storey flat-roof temporary building (consisting of vinyl panels, a metal roof and PVC windows). Within the Estates and Facility office there is a first floor with a pitched roof and a roof void. A glass-covered courtyard straddles the brick buildings and the temporary building. This building was formerly the original workhouse laundry, it is currently used for complex depression, anxiety and trauma services and iCope.

Jules Thorn Day Hospital



Single storey masonry walled U shaped building with timber upper cladding built in the circa 1975. The roof has two pitched sections to the east and the west. The roof structure is wooden rafters overlaid by clay tiles finished with cement fixing on the gable ends. It is currently used as Camden's Acute Day Unit, Clozapine Clinic and North London Partners Specialist Perinatal Mental Health Service.

Kitchen Building



The building consists of a three-storey section and a two-storey section flanked by one-storey sections. The roofs are slate pitched roofs and the walls are constructed of brick. Metal escape stair to three storey building. Some plant equipment is located at first roof level. The Kitchen Building was constructed circa 1885. The building is currently disused.

Post Room & Former Mortuary



A series of single storey buildings with flat roofs, red brick walls and transparent skylights, built circa 1890. They are in use as the Post Room and Former Mortuary (including Cold Room, a corridor, bathroom, office). Each of the following rooms has their own door to the outside: electrical room, switch room and generator room. The building has little architectural merit and is currently disused.

Table 2.1: Summary of Existing Built Form

2.7 Please refer to the existing floorspace schedule in **Table 2.2** below.

| Floor | Ash House | Bloomsbury Day Centre | Camley Building | Jules Thorn Day Centre | Kitchen Building | Post Room & Former Mortuary |
|--------------|-----------------|-----------------------|-----------------|------------------------|------------------|-----------------------------|
| Lower Ground | - | - | 977.14 | - | 211.4 | - |
| Ground | 837.74 | 717.11 | 761.72 | 489.22 | 403.28 | 202.07 |
| First Floor | 836.59 | 439.23 | 97.05 | - | 36.12 | - |
| Total | 1,674.33 | 1,156.34 | 1,835.91 | 489.22 | 650.8 | 202.07 |
| Total | 6,008.67 | | | | | |

Table 2.2: Existing Floorspace Schedule by Building (GIA sqm)

Accessibility

- 2.8 The site has vehicle access points on St Pancras Way and Granary Street, and a service road runs east-west between the two roads. There is a system of internal service roads providing access to each of the existing buildings within the SPH site. The access on St Pancras Way is barrier controlled, and the access on Granary Street is gated and is generally locked.
- 2.9 The site is well connected in terms of public transport and has an ‘excellent’ Public Transport Accessibility Level (‘PTAL’) of 6b (measured on a scale of 0 to 6b, where 6b is the highest).
- 2.10 St Pancras International Station and Kings Cross Station are located approximately 850m (approximately a 10-minute walk) to the south of the site. St Pancras International Station is served by East Midlands Railway, Southeastern and Thameslink with destinations including Bedford, Brighton, Nottingham, Sheffield and Margate. Typically, there are 56 services operating in each direction at peak times. Furthermore, there are international train services towards Paris, Amsterdam and Brussels, operated by EuroStar. King’s Cross Station is served by the London North Eastern Railway, Great Northern, Hull Trains and Grand Central Railway services with destinations to Leeds, Kings Lynn, Cambridge and Stevenage. This station has 16 services operating in each direction at peak times.
- 2.11 The site is approximately 1.3km (approximately a 15-minute walk) from Euston Station, which is served by Avanti West Coast and West Midlands Trains. Destinations include Birmingham, Liverpool, Manchester and Edinburgh. There are 22 services operating in each direction during the AM (08:00-09:00) and 14 arriving and 19 departing in the PM (17:00-18:00) peak hours (which excludes the London Overground services).
- 2.12 The closest station to the site is Mornington Crescent underground station, it is located approximately 650m to the west (8-9 minutes’ walk). Furthermore, there are also London Underground stations at Kings Cross/St Pancras International and Euston Rail Station, which are a walkable distance from the site.
- 2.13 The closest bus routes to the site are 46 and 214. Bus route 46 operates northbound on the Royal College Street with the nearest stop approximately 290m away (3-4 minutes’ walk). Southbound services and route 214 can be accessed from Crowndale Road 200m to the south west.

- 2.14 The site is located towards the edge of the current TfL cycle hire scheme coverage and there are two docking locations within a short walk of the site. The nearest cycle docking station is located 260m from the site on Royal College Street with 57 docking points. An alternative cycle docking station with a further 16 docking points is located 500m from the site, outside St Pancras Station on Pancras Road. Segregated cycle lanes extend along both sides of Royal College Street.
- 2.15 The northern extension of Cycleway 6 ('C6') between Kings Cross Station and Kentish Town opened in September 2019. C6 runs close to the site, on Royal College Street and Pancras Road. Proposed cycle Quietway 1 (Q1) will run in the north-south direction in the proximity to the Site on Arlington Road. It is a proposed connection between C6 and Q1, as an extension of Q1 on Pratt street.
- 2.16 There is a cycle lane on St Pancras Way to the north of the site. Between the junctions with Randolph Street and Baynes Street there is a short section of segregated northbound only cycle lane on the western side of the carriageway. From Baynes Street to the south the segregated cycle lane becomes two-way to the junction with Georgiana Street. From Georgina Street south there is an advisory cycle lane on the eastern side of the road (southbound only). The advisory lane ends at the northern end of the Ted Baker Head Office site (2-6 St Pancras Way, London NW1 0TB), and there is then a gap until a short section of advisory cycle lane on the approach to the St Pancras Way/Pancras Road junction, where there is also an advanced stop line for cyclists.
- 2.17 The site is currently located outside of the Congestion Charge Zone/Ultra Low Emissions Zone ('ULEZ'). However, the intended extension of the ULEZ will cover the whole of LBC from October 2021, which will require drivers of certain vehicles to pay a daily fee to drive to the site.
- 2.18 There are no existing blue badge parking bays in the vicinity of the site. Granary Street has on-street parking capacity for approximately five cars, the parking is pay and display Monday to Friday between 0830 and 1830 with a maximum stay of four hours. An on-street parking bay is also located to the north of the St Pancras Way / Granary Street junction with restrictions Monday to Friday between 0830 and 1730 and a maximum stay of two hours. This parking bay has capacity for approximately seven cars. Residential streets surrounding the site are within a Controlled Parking Zone (CA - G/F), with parking restricted to permit holders only on Monday to Friday from 8:30am to 6:30pm. Within the local area there are three car parks, located at Pratt Street (Lomax Car Park), King's Cross (Handyside Car park) and St Pancras Car Park.

Surrounding Area

- 2.19 The site is surrounded by a diverse built environment and mix of uses. Immediately adjoining the site to the east and south is the remainder of the SPH site which comprises a range of 2-5 storey Victorian buildings and infrastructure, constructed as part of the site's original use as a workhouse, and low-rise modern buildings. To the north of the site is the Ted Baker Head Office (nicknamed and widely known as the 'Ugly Brown Building'), which recently received planning permission for a comprehensive mixed-use redevelopment comprising a mix of commercial and residential uses (ref. 2017/5497/P). To the east, beyond the St Pancras Hospital buildings is Regent's Canal, 101 Camley Street, a mixed-use development currently under construction (ref. 2018/3682/P) and 103 Camley Street, a mixed-use development which is now occupied (ref. 2011/5695/P). To the west of the site is a mixed-use development comprising student housing and a builders' yard. To the south, beyond the Hospital campus is St Pancras Gardens (Site of Importance

for Nature Conservation (SINC) and Registered as a grade II Historic Park and Garden of Special Historic Interest).

2.20 The area surrounding the site is experiencing a great degree of change. The site sits within the ‘Knowledge Quarter’, a cluster of world leading life science and knowledge industry uses positioned along the Euston – Kings Cross area. The Knowledge Quarter already boasts a wider ranging consortium of 100 academic, cultural, research, scientific and media organisations of differing sizes and interests: from the British Library, UCL; Google and the Wellcome Trust to Arts Catalyst, Scriberia and the Wiener Library. As part of the aims to maintain and strengthen Camden’s economy and competitiveness, further development of this quarter as a nation hub for knowledge industries is encouraged whilst also harnessing benefits for our local communities.

Site Specific Designations

2.21 LBC adopted its Policies Map in 2017. The Policies Map reveals the site to be subject to the following site-specific planning designations (see **Figure 2.3**):

- Site 6: 4 St Pancras Way (St Pancras Hospital) – Mixed use comprising health and medical related uses and/or permanent (C3) housing and affordable housing and other complementary uses (see **Figure 2.4**).
- Kings Cross/St Pancras Conservation Area.

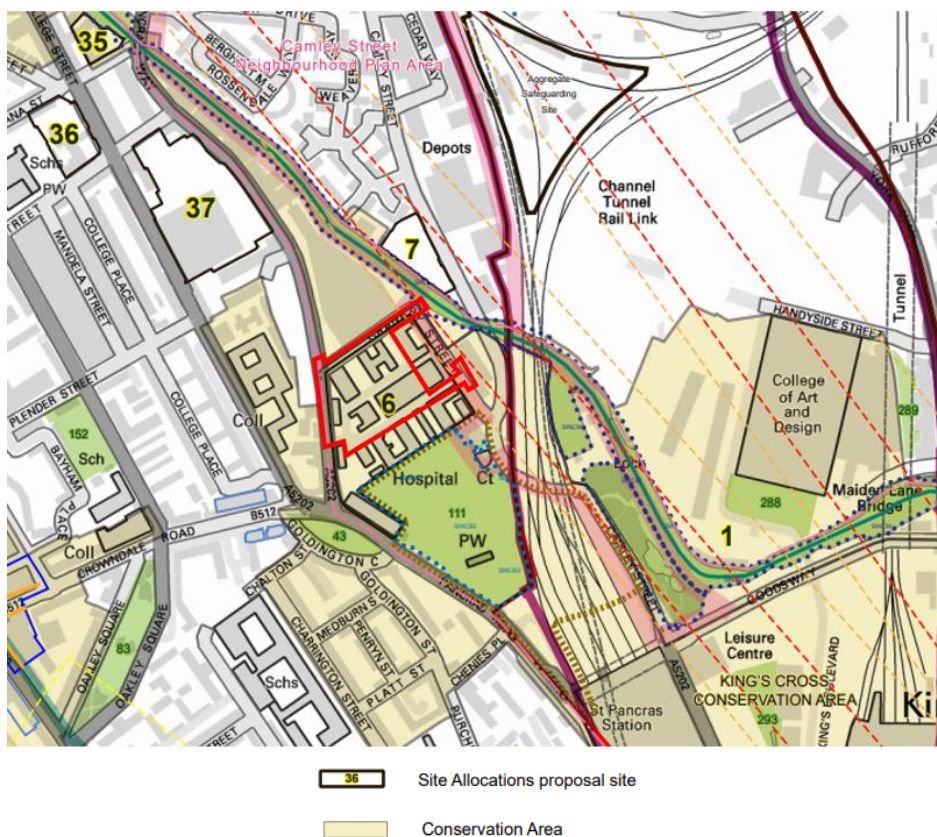


Figure 2.3: Extract from LBC Proposal Map



Figure 2.4: Extract from Camden Site Allocations Local Development Plan Document (September 2013)

- 2.22 A single false acacia tree within the site is protected by a Tree Preservation Order ('TPO') (ref. C402 2003).
- 2.23 Immediately to the south of the SPH site lies the St Pancras Gardens, which is a Grade II Registered Park and Garden. The Church Gardens are also designated as public open space, a Borough Grade 2 Site of Importance for Nature Conservation and form part of an Archaeological Priority Area.
- 2.24 To the south west of the SPH site is Goldington Crescent Gardens which is a designated London Square.
- 2.25 The eastern boundary of the wider St Pancras Hospital site sits adjacent to but outside of the Camley Street Neighbourhood Plan Area.
- 2.26 St Pancras Way forms part of a designated Metropolitan Walk.
- 2.27 The site also benefits from a site allocation in the LBC draft Site Allocations Local Plan Document (February 2020) – see **Figure 2.5**. Draft Policy CSP5 allocates the site for health, self-contained homes and employment (knowledge quarter uses).



Figure 2.5: Extract from LBC draft Site Allocations Local Plan Document (February 2020)

2.28 In addition, the Canalside to Camley Street Draft Supplementary Planning Document (July 2020) identifies that redevelopment of the site “will offer major opportunities for investment in new health and research related facilities and in the restoration and making better use of important heritage assets. New pedestrian routes and public spaces should be created to make the site more inviting, outward looking and connected with the area. Developed in a comprehensive and co-ordinated way, proposals should also take account of, and link with, the Ted Baker proposals to the north and 101 Camley Street and the canal to the east.”

Conservation Areas

2.29 The site is located within the Kings Cross/St Pancras Conservation Area and immediately adjacent to and contiguous with the linear Regent’s Canal Conservation Area to the north and east.

2.30 The King's Cross Conservation Area was first designated by the Greater London Council in March 1986. It was enlarged on two occasions, in 1991 to include areas south of the Euston Road; and in 1994 to include the area surrounding St Pancras Gardens. The Kings Cross and St Pancras area has been the subject of numerous regeneration schemes, most recently as part of the Kings Cross Opportunity Area and substantial redevelopment brought about under this initiative has meant that the character of parts of the conservation area has changed substantially since the Conservation Area Statement was adopted in December 2003.

2.31 The Conservation Area has a strong historic character and contains a high number of listed buildings amongst these are two of the most important historic buildings and structures in the country relating to railway architecture and history, namely the grade I listed Kings Cross Station and St Pancras Station.

2.32 The Kings Cross/St Pancras Conservation Area Statement identifies that the site lies within Sub Area 1: St Pancras Gardens. This sub area comprises of a mix of residential and institutional uses centred upon St Pancras Gardens.

2.33 It also notes that the Kitchen Building, the Camley Building and perimeter wall make a positive contribution to the special character and appearance of the Area (see **Figure 2.6**). Ash House, the Jules Thorn Day Centre and Post Room & Former Mortuary are considered to be neutral contributors to the Conservation Area. The Bloomsbury Day Hospital is considered to make a negative contribution to the Conservation Area.

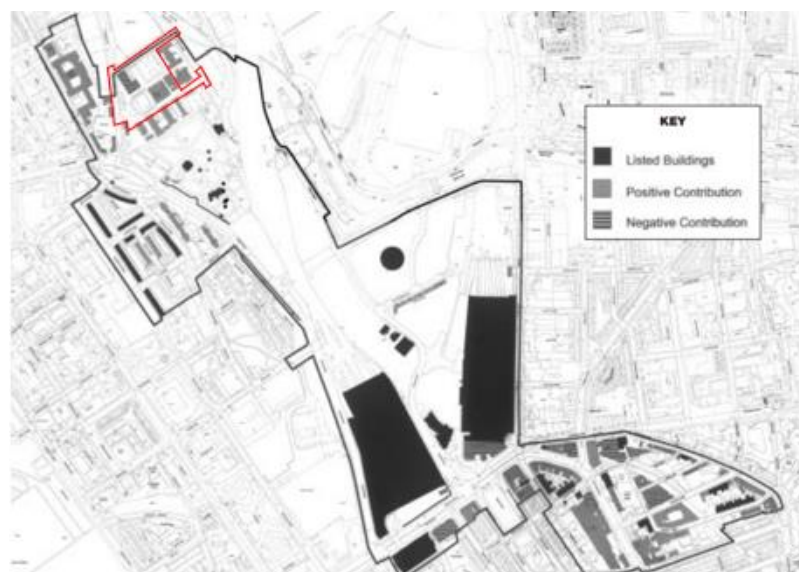


Figure 2.6: Extract from Kings Cross/St Pancras Conservation Area Statement (December 2003)

Listed Buildings

2.34 There are no listed buildings within the site. Seventeen Certificates of Immunity from Listed (‘COIL’) have been issued by Historic England in respect of the St Pancras Hospital site, and all seventeen expired on 24th August 2020. Historic England concluded:

“The site of the former St Pancras Workhouse has clear local historic interest as a manifestation of the parish’s provision for the poor and destitute under the English Poor Law. A number of the buildings have local architectural and group interest for this same reason, and contribute to the character of the conservation area in which they stand. However, after examining all the records and other relevant information and having carefully considered the architectural and historic interest of this case, none of the buildings assessed meets the criteria for listing. The buildings are therefore not recommended for listing, and it is recommended that a COI be issued for each one.”

2.35 Immediately to the south of the SPH site lies the St Pancras Gardens, which is a Grade II Registered Park and Garden. The Church Gardens also contain a number of listed tomb structures, including the Grade I Listed tomb of Sir John Soane and the Grade II* listed Burdette-Coutts Memorial Sundial.

2.36 Also, to the south is the Grade II* Listed St Pancras Old Church. In addition, the Grade II Listed St Pancras Coroner’s Court lies to the south of the SPH site, on the Eastern side of the gardens abutting Granary Street.

2.37 The nearest locally listed building to the site is 26 Crowndale Road, the former Old St Pancras Church House. The Camley Street Natural Park is a locally listed garden.

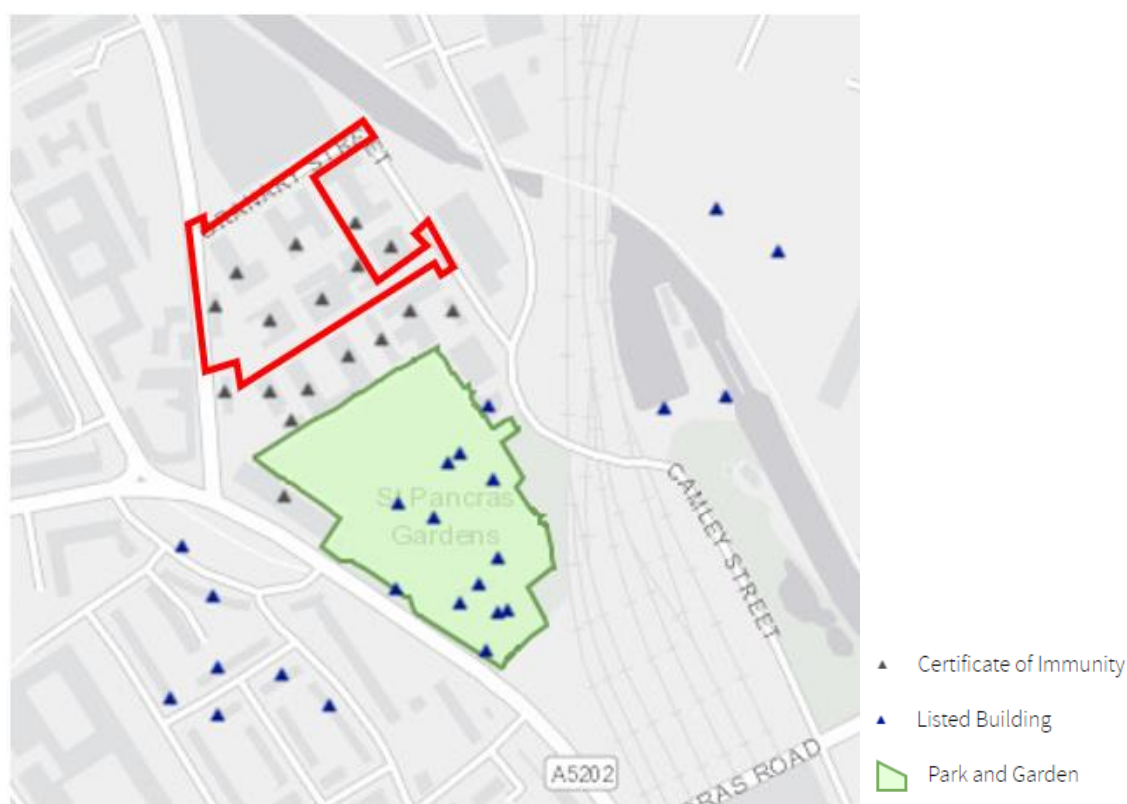


Figure 2.7: Extract from Historic England List – Map Search

Strategic Views

- 2.38 The London View Management Framework (LVFM) is a key part of the Mayor of London's Strategy to preserve London's character and built heritage. It explains the policy framework for managing the impact of development on key London Panoramas, Linear Views, River Prospects and Townscape Views.
- 2.39 The application site does not fall within any of the LVFM views, however the following protected vista shaves the eastern side of the wider SPH site:
- 2A.1 Parliament Hill: the summit – looking toward St Paul's Cathedral (see **Figure 2.8**)



Figure 2.8: Annotated map of Protected Vista from Assessment Point 2A.1 to St Paul's Cathedral

Flood Risk

- 2.40 The Environment Agency's Flood Map for Planning shows that the site is located in Flood Zone 1 (Low Probability) which is defined as land having a less than 1 in 1,000 annual probability of river or sea flooding.
- 2.41 LBC is a Lead Local Flood Authority, meaning it has responsibility for managing flood risk from surface water and groundwater in the Borough. Areas at risk of flooding in Camden have been identified in the Council's Surface Water Management Plan and Strategic Flood Risk Assessment. The site sits within a Critical Drainage Area (ref. Group3_003) and is situated on the border of the King's Cross Local Flood Risk Zone (Figure 2.9).

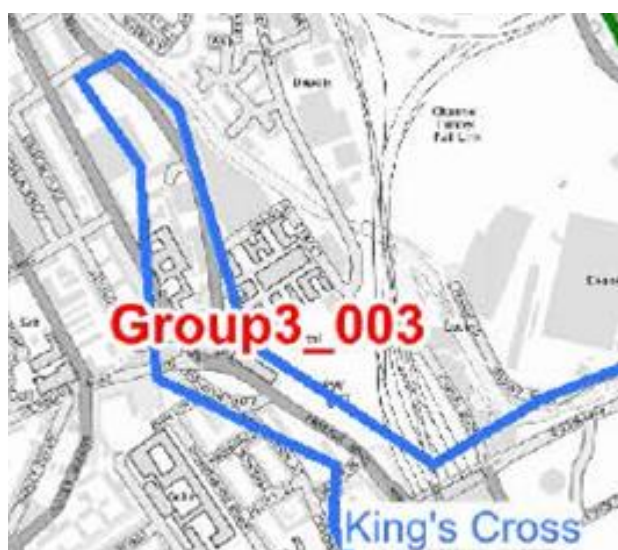


Figure 2.9: Local Flood Risk Zone

3. Planning History

3.1 Research into the online statutory planning history register held by LBC has revealed several planning history records for the SPH site. **Table 3.1** sets out the recent planning applications pertaining to the site.

| Planning Reference | Description of Development | Decision | Date |
|--------------------|---|--|------------|
| 2020/1770/INVALID | Alterations to 1) 4 Greenland Road and 2) The Huntley Centre. The only external alterations to the buildings are the replacement of some windows to The Huntley Centre. | Withdrawn | - |
| 2020/0298/P | Request for screening opinion for construction of a specialised ophthalmology clinical, research and education facility at St Pancras Hospital site, plot 1. | Registered | - |
| 2006/3122/P | Erection of two-storey brick and glass extension to provide a new stair and lift tower to the north block of the hospital building and installation of a new external access ramp (Class C2). | Granted | 31/08/2006 |
| 2004/4057/P | The amendment of planning permission (2004/0916/P) granted on 20th April 2004 to include the alteration to the roof line and the provision of external plant equipment (chiller units) on the link roof of the north wing building. | Granted | 01/12/2004 |
| 2004/0916/P | Erection of a basement, ground and first floor infill extension and alterations to the existing north wing building to provide additional hospital accommodation (Class D1). | Granted | 20/04/2004 |
| 2003/1567/P | Erection of a single storey electrical sub-station adjacent St Pancras Way frontage and a single storey generator/switch room adjacent St Pancras Gardens frontage. | Granted | 15/12/2003 |
| PEX0300190 | The replacement of the existing access ramp at the rear of south wing with a new re-configured ramp. (Revised Plans Submitted) | Granted | 21/07/2003 |
| PS9904751 | The erection of a two storey annexe building on the south western elevation for hospital use together with associated means of escape, as shown by drawing numbers 9903/P01, 9903/P02, 9903/P03, 9903/P04, 9903/P05 and site plan. | Grant Full Planning Permission (conds) | 26/10/1999 |
| 9400074 | Alterations to main vehicular/pedestrian access as shown on one drawing numbered STPAN.4.01/G and revised by letters dated 27th January 1994 and 11th February 1994 | Grant Full or Outline Perm. With Condit. | 18/02/1994 |

Table 3.1: Summary of Recent Planning Permissions on the St Pancras Hospital Site

3.2 The above planning history indicates that the site has not been subject to any recent applications for large-scale, comprehensive redevelopment, nor are there any extant planning applications which relate to increasing building height or demolition of any buildings within the site boundary.

Surrounding Area

3.3 The site lies within the Camley Street and St Pancras Way area. Over recent years, this area has been dramatically transformed with the redevelopment of King's Cross Central and the emergence of the Knowledge Quarter. As such, the development proposal must be considered in the context of the benefits of the on-going renaissance of this area. Recent planning permissions surrounding the application site are set out below and in **Figure 3.1**.



Figure 3.1: Recent Planning Permissions Surrounding the St Pancras Hospital Site

(a) Ugly Brown Building

3.4 The site comprises of 2-6 St Pancras Way, London NW1 0TB which is located immediately to the north of the application site. A planning application (ref. 2017/5497/P) was submitted on 18th October 2017 for:

“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.”

3.5 The application was approved on 17th March 2020, construction has not yet commenced. Two applications for approval of details (ref. 2020/3160/P and 2020/4315/P) are currently pending consideration.

(b) 101 Camley Street, London NW1 0PF

3.6 The site comprises of 101 Camley Street, London NW1 0PF which is located east of the application site. A planning application (ref. 2018/3682/P) was submitted on 4th July 2014 for:

“Variation of Condition 2 (approved plans) of planning permission 2014/4385/P dated 18/03/2015 (as varied by 2016/6311/P dated 14/07/2017) for (Demolition of existing building and new building ranging from 6 -13 storeys comprising 2,220sqm employment floorspace (Class B1), 121 residential flats, pedestrian footbridge over the Regent's Canal and associated works) CHANGES INCLUDE external amendments to the approved development - Landscaping works, façade development (spandrels, doors, glazing, canopies, windows), terraces and balconies, edge protection and building services.”

3.7 The application was approved on 18th March 2015 and is currently nearing completion.

(c) 102 Camley Street, London NW1 0PF

3.8 The site comprises of 102 Camley Street, London NW1 0PF which is located east of the application site. A planning application (ref. 2014/4381/P) was submitted on 4th July 2014 for:

“Demolition of existing warehouse building (Class B8) and redevelopment for a mixed-use building ranging from 8-12 storeys comprising 1,620sqm employment floorspace (Class B1), 154 residential flats, the provision of a public ramp access to the Regents Canal towpath, and associated landscaping and other works relating to the public realm.”

3.9 The application was approved on 30th March 2015 and completed at the end of 2018.

(d) 103 Camley Street, London NW1 0PF

3.10 The site comprises of 103 Camley Street, London NW1 0PF which is located east of the application site. A planning application (ref. 2011/5695/P) was submitted on 7th December 2011 for:

“Demolition of existing industrial buildings (Class B1c & B8) and the erection of a building ranging from 4-12 storeys to create a mixed use development comprising 307 x student units accommodation (Class Sui-Generis) including student cycle store; 14 x 2-bed, 15 x 3-bed and 11 x 4-bed self-contained residential flats (Class C3); incubator business units comprising 1,653sqm floorspace (Class B1); 2 x retail units of 406sqm (Class A1/A3) and associated works and improvements to public realm including canal footpath.”

3.11 The application was approved on 15th March 2012 and completed September 2014.

(e) 70-86 Royal College Street, London NW1 0TH

3.12 The site comprises 70-86 Royal College Street, London NW1 0TH which is located to the north of the application site. A planning application (ref. 2020/0728/P) was submitted on 25th February 2020 for:

“Demolition of existing buildings (Class B2); erection of 5 storey building (plus rooftop pavilions/plant and basement) to provide a mixed Class C2/D1 healthcare facility (Sui Generis). “

3.13 The application was granted conditional planning permission at planning committee on 9th July 2020, subject to signing a section 106 legal agreement.

3.14 This application facilitates the relocation of the St Pancras Hospital South Wing to enable redevelopment of the St Pancras Hospital to occur.

(f) Land at Polygon Road Open Space, Edith Neville Primary School 174 Ossulston Street and Purchase Street Open Space London NW1

3.15 The site comprises of Land at Polygon Road Open Space, Edith Neville Primary School 174 Ossulston Street and Purchase Street Open Space London NW1 which is located to the south of the application site. A planning application (ref. 2015/2704/P) was submitted on 4th January 2016 for:

“Demolition of existing buildings and the provision of approximately 2,190sq.m replacement school (Use Class D1); approximately 1,765sq.m of community facilities (Use Class D1); approximately 207sq.m of flexible Use Class A1/A2/A3/D1 floorspace and 136 residential units (Use Class C3) over 7 buildings ranging from 3 to 25 storeys in height comprising: Plot 1: Community uses at ground floor (Use Class D1) (approximately 1,554sq.m) to include a children’s nursery and community play facility with 10no. residential units above; Plot 2: 35 residential units over flexible A1/A2/A3/D1 floorspace at ground level (approximately 137sq.m); Plot 3: Extension of Grade II listed terrace to provide 3no. dwellings; ? Plot 4: Replacement school (Use Class D1); Plot 5: 20no. residential units over a replacement community hall (Use Class D1) (approximately 211sq.m); Plot 6: 14no. residential units; and Plot 7: 54no. residential units over flexible A1/A2/A3/D1 floorspace at ground level (approximately 70sq.m). Provision of 11,765 sqm of public open space along with associated highways works and landscaping.”

3.16 The application was approved on 14th October 2016 and is currently under construction.

Kings Cross Central Development

3.17 The site comprises of land between Euston Road, St Pancras Station, Midland Main Line, The New Channel Tunnel Rail Link, York way and Kings Cross Station which is located to the east of the application site. A planning application for outline planning permission (ref. 2004/2307/P) was submitted on 10th June 2004 for:

“Outline application for a comprehensive, phased, mixed-use development of former railway lands within the King's Cross Opportunity Area, as set out in the Revised Development Specification. The development comprises business and employment uses within the B1 use class; residential uses (including student accommodation), serviced apartments and hotels; shopping, food and drink and financial and professional services within the A1, A2, A3, A4 and A5 use classes; the full range of community, health, education, cultural, assembly and leisure facilities, within the D1 and D2 use classes; night clubs; multi storey and other car parking; re-erection of the linked triplet of gas holder guide frames to enclose new residential and other development, on the site of the Western Goods Shed; re-erection of the guide frame for gas holder no 8, alongside the re-erected triplet, to enclose new play facilities and open space; relocation of an existing district gas governor; works of alteration to other existing buildings and structures, to facilitate their refurbishment for specified uses; new streets and other means of access and circulation; landscaping including open space; new bridge crossings and other works along the Regent's Canal; the re-profiling of site levels; and other supporting infrastructure works and facilities (R1).”

3.18 The application was approved 22nd December 2006 and is currently under construction. Whilst some of the development is now complete and operational, developments g-l set out below are currently under construction.

(g) Development Zone A – Kings Cross Central Development

3.19 The site comprises of Development Zone A, which is part of the wider Kings Cross Central Development. A planning application for reserved matters (ref. 2017/3133/P) was submitted on 30th May 2017 for:

“Reserved matters in relation to Zone A for erection of 7-11 storey building for use as offices (Class B1) with ancillary staff facilities, including a cafe, gym, pool, Multi Use Games Area, events centre and landscaped roof garden; retail at ground floor level (Class A1) and two levels of basement incorporating a loading bay, 4 x accessible parking spaces, mechanical plant; and works to public realm in Battle Bridge Place, King's Boulevard and Goods Way.”

3.20 The application was approved on 16th August 2017 and is currently under construction.

(h) Building P2 – Kings Cross Central Development

3.21 Building P2 forms part of the wider Kings Cross Central Development. A planning application for reserved matters (ref. 2018/2628/P) was submitted on 7th June 2018 for:

“Reserved matters relating to Plot P2 within Development Zone P for the erection of a 12 storey building for office use (Class B1) with flexible retail (A1-A5) and theatre (Sui Generis) uses at ground floor, and public realm works to parts of Handyside Street, Wollstonecraft Street and between the proposed building and the Gasholder Triplets. As required by conditions 6, 9, 10, 14, 16-22, 27, 28, 31, 33- 36, 37, 38, 44, 46, 48, 49, 50A, 51, 56, 60 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.”

3.22 The application was approved on 4th September 2018 and is currently under construction.

(i) Building S1 – Kings Cross Central Development

3.23 Building S1 forms part of the wider Kings Cross Central Development. A planning application for reserved matters (ref. 2017/5204/P) was submitted on 20th September 2017 for:

“Reserved matters relating to Building S1 within Development Zone S for erection of a 12 storey building, plus single level basement, with mixed office (B1), flexible office or leisure (B1 or D2) and retail uses (A1-A4) at ground floor, mixed office (B1) and flexible office or leisure uses (B1 or D2) at 1st & 2nd floor and office (B1) uses at 3rd-12th floor, and associated servicing, cycle parking, plant, and public realm on Handyside Street, Canal Reach and within the tertiary routes of zone S along the northern and eastern side of the building and between S2 and S4, as required by conditions 9, 10, 12, 14, 16-22, 27, 28, 31, 33- 38, 45, 46, 48, 49, 50a, 51, 56, 60, 63-67 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.”

3.24 The application was approved on 27th October 2017 and is currently under construction.

(j) Buildings T2-T4 – Kings Cross Central Development

3.25 Buildings T2-T4 form part of the wider Kings Cross Central Development. A planning application for reserved matters (ref. 2016/3195/P) was submitted on 10th June 2016 for:

“Reserved matters relating to Plots T2-T4 within Development Zone T for erection of two buildings, T2 (part 9, part 10 storeys) and T3 (part 10, part 12 storeys), for use as offices (Class B1) on upper floors, a primary health care centre in T2 (Class D1) at ground floor and flexible commercial/office/leisure units to ground and first floors (A1-A4/B1/D2) and a fuel cell to the south west corner of T2. Associated cycle and car parking, refuse store, storage and plant areas provided. Public realm works to the western side of Canal Reach. As required by conditions 9, 10, 14, 16-22, 27, 28, 31, 33- 36, 45, 46, 48, 49, 50A, 51, 56, 60 and 63-67 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.”

3.26 The application was approved on 23rd January 2017 and is currently under construction.

(k) Building S5 – Kings Cross Central Development

3.27 Building S5 forms part of the wider Kings Cross Central Development. A planning application for reserved matters (ref. 2019/3244/P) was submitted on 25th June 2019 for:

“Amendment to reserved matters application 2018/4813/P dated 20/12/2018, namely alterations to the unit mix to increase total number of dwellings from 158 to 163, additional terrace at level 5, 9 additional balconies on west and east cores, alterations to brickwork at ground floor level and increase in on-site cycle parking provision.”

3.28 The application was approved on 2nd September 2019 and is currently under construction.

(l) Building Q2 – Kings Cross Central Development

3.29 Building Q2 forms part of the wider Kings Cross Central Development. A planning application for reserved matters (ref. 2016/5580/P) was submitted on 13th October 2016 for:

“Reserved matters relating to Plot Q2 within Development Zone Q for the erection of a two-storey building for use as a sports hall and gym (Class D2) and public realm works to Wilberforce Street and York Way together with amendments to the public realm of the R4 Courtyard. As required by conditions 12, 14, 16-22, 27, 28, 31, 33- 38, 44, 45, 46, 48, 49, 50A, 51, 56, 60 and 63-67 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.”

3.30 The application was approved on 2nd February 2017 and is currently under construction.

Relocation of Existing SPH Services

3.31 The relocation of Moorfields at City Road and UCL IoO from Bath Street is facilitated by the relocation of the existing C&I services on the SPH site.

3.32 As set out above, an application at 70-86 Royal College Street, London NW1 0TH (ref. 2020/0728/P) has been granted conditional planning permission to facilitate the relocation of the St Pancras Hospital South Wing.

- 3.33 Planning permission and listed building consent (reference: P2020/0687/FUL and P2020/0761/LBC) was approved on 10th July 2020 for “*Demolition of the existing buildings and erection of a new 78no. bedroom mental health inpatient facility with associated landscaping and cycle parking.*” This application relates to the land at Whittington Hospital purchased by the C&I Trust to enable the re-provision of acute mental health inpatient facilities currently operating from the SPH site. This new site will be known as ‘Highgate East’ and the existing Highgate Mental Health Centre, as ‘Highgate West’.
- 3.34 The applications set out above demonstrate that an operational strategy is underway to relocate the existing facilities from the SPH site and to ensure no interim loss of services. Moreover, preparations are also progressing for the development and location of community hubs at Lowther Road, Greenland Road, St Pancras and in North West Camden. Indeed, work is now underway to prepare a planning application for the Lowther Road hub. It is anticipated that public consultation on these proposals will be undertaken in Autumn 2020. It is anticipated that the new inpatient and first community facility builds will be completed by 2022.
- 3.35 More information on the St Pancras Transformation programme can be found at the following webpages:
- <https://www.candi.nhs.uk/news/st-pancras-transformation-programme>
 - <https://www.candi.nhs.uk/about-us/plans-redevelop-our-facilities>

4. Pre-application Consultation

- 4.1 This section summarises the pre-application consultation undertaken in advance of the application submission.
- 4.2 A wide range of consultation has taken place during the design evolution of this scheme. This has included engagement with LBC and GLA Officers, Local Councillors, local residents and community groups.
- 4.3 Further detail regarding the public consultation process is provided in the Statement of Community Involvement ('SCI') prepared by London Communications Agency and submitted in support of this application.

Pre-application Consultation Meetings

- 4.4 A list of pre-application meetings with LBC and GLA Officers, Local Councillors, local residents and community groups is set out in **Table 4.1** below:

| Date | Meeting Type |
|--------------------------------|--|
| Stage 1 | |
| 26 th February 2019 | LBC Pre-application Meeting |
| 11 th March 2019 | LBC Pre-application Meeting |
| 25 th April 2019 | LBC Pre-application Meeting |
| 22 nd May 2019 | LBC Pre-application Meeting |
| 12 th June 2019 | LBC Pre-application Meeting |
| 3 rd July 2019 | LBC Pre-application Meeting |
| 9 th October 2019 | LBC Pre-application Meeting |
| Stage 2 | |
| 22 nd January 2020 | LBC Pre-application Meeting (Design) |
| 26 th February 2020 | LBC Pre-application Meeting (with KCCLP) |
| 26 th March 2020 | GLA Pre-application Meeting |
| 15 th April 2020 | LBC Pre-application Meeting (Design) |
| 15 th April 2020 | LBC Pre-application Meeting (with KCCLP) |
| 24 th April 2020 | Design Review Panel |
| 29 th April 2020 | LBC Pre-application Meeting (Highways and Servicing) |
| 20 th May 2020 | LBC Pre-application Meeting (with KCCLP) |
| 22 nd May 2020 | LBC Pre-application Meeting (Design) |
| 17 th June 2020 | LBC Pre-application Meeting (with KCCLP) |
| 17 th June 2020 | LBC Pre-application Meeting (Design) |
| 17 th June 2020 | Designing Out Crime Meeting (Met Police) |
| 15 th July 2020 | LBC Pre-application Meeting (with KCCLP) |
| 16 th July 2020 | LBC Pre-application Meeting (Energy) |
| 23 rd July 2020 | LBC Pre-application Meeting (Archaeology, Townscape, Daylight and Sunlight and Wind) |
| 28 th July 2020 | Royal Veterinary College and London BioScience Innovation Centre |
| 30 th July 2020 | LBC Pre-application Meeting (Highways and Servicing) |
| 3 rd August 2020 | Meeting with Cabinet Member for Investing in Communities, Cllr Danny Beales and Chief Planning Officer, Dan Pope |
| 13 th August 2020 | LBC Pre-application Meeting (Environmental Impacts 1) |
| 17 th August 2020 | Camden Council Strategic Panel on Emerging Planning Proposals |
| 18 th August 2020 | Online Public Consultation Event |

| | |
|---------------------------------|---|
| 19 th August 2020 | LBC Pre-application Meeting (Basement Impact Assessment and Socio-Economic Impact) |
| 21 st August 2020 | Design Review Panel |
| 24 th August 2020 | Online Public Consultation Event |
| 26 th August 2020 | LBC Pre-application Meeting (Environmental Impacts 2) |
| 26 th August 2020 | Camden Town Unlimited (Business Improvement District) |
| 10 th September 2020 | LBC Pre-application Meeting (Environmental Impacts 3) |
| 18 th September 2020 | LBC Pre-application Meeting (Design and Planning) |
| 18 th September 2020 | Somers Town Big Local |
| 24 th September 2020 | Camden Council Development Management Forum |
| 28 th September 2020 | West Euston Partnership |
| 29 th September 2020 | Somers Town Neighbourhood Forum (also attended by one of the St Pancras and Somers Town Ward Councillors) |
| 6 th October 2020 | Knowledge Quarter |
| 12 th October 2020 | Camden Cyclists Campaign |
| 14 th October 2020 | Oriel St Pancras Way Residents Forum |

Table 4.1: Pre-application Engagement

4.5 Further detail of the pre-application feedback and subsequent design evolution is set out within the Design and Access Statement.

Early Community Consultation

4.6 Between 2013 and 2019, five phases of engagement took place about the proposed move and the options available.

4.7 NHS Camden Clinical Commissioning Group ('CCG') and NHS England Specialised Commissioning, in partnership with Moorfields, ran an extensive consultation between 24th May and 16th September 2019 which gave patients, staff and the general public the opportunity to comment on the proposal.

4.8 The results of the consultation are available to view at the following website: <https://oriel-london.org.uk/consultation-documents/>

4.9 Over 4,600 contributions were received during the consultation through various means of communication including, discussion groups, emails, phone calls and the consultation survey.

4.10 An independent analysis of the survey results indicated that 73% of responses agreed with the proposed new centre and 73% agreed with St Pancras as the preferred site.

2020 Community Consultation

4.11 As a result of the COVID-19 pandemic, it has not been possible to host a traditional public exhibition of the proposals or have face-to-face consultation meetings with people in 2020, to make sure the views of as many people as possible have been heard the following has been undertaken:

- Two public virtual discussion events were held on Tuesday 18th August and Monday 24th August from 1800-1900). These took place via the online platform Microsoft Teams and were attended by over 50 people.

- Virtual meetings held with local community stakeholders, including Somers Town Neighbourhood Forum, West Euston Partnership, Camden Town Unlimited, Camden Cycling Campaign and St Pancras Community Association.
- Virtual meetings with neighbours including the Royal Veterinary College and London BioScience Innovation Centre and the Knowledge Quarter, which are based in close proximity to the St Pancras Hospital site.
- Stakeholder meeting held with the Cabinet Member for Investing in Communities and Chief Planning Officer.
- The establishment of the Oriel St Pancras Way Residents Forum.
- A Development Management Forum (DMF), organised by LBC, gave people an opportunity to find out about and comment on the emerging proposals.
- Regularly updates to the Oriel website – <https://oriel-london.org.uk/>
- Two editions of a four-page consultation newsletter, both of which included a freepost feedback card, these were hand-delivered to 6,341 homes and businesses in a 550m wide radius around the site. These newsletters have included freepost comment cards.
- An eight-page consultation booklet issued to the key local stakeholders and available to download from the Oriel website.
- A film that included a presentation from the architects on the emerging scheme. This was available on the website, widely promoted and used in the public virtual meetings.
- Letters sent to key stakeholders including residents'/tenants' associations, local groups, businesses, Camden councillors and officers.
- Information provided to staff at Moorfields and UCL on internal screens, in staff bulletins, weekly emails, presentations and meetings.
- Information provided to patients of Moorfields on television screens across the Moorfields network, virtual meetings, email and social media updates and news stories.
- Poster to promote the consultation and information about the proposals distributed to local groups, GP surgeries, pharmacies and local opticians to display.
- A large PVC banner displayed on the railings of the St Pancras Hospital site with a QR code enabling people to easily link to the Oriel website and consultation information.
- Feedback mechanisms including Freepost, Freephone and email, with all questions and feedback responded to.
- Paid-for targeted social media advertising via Facebook and Instagram, used to promote the public consultation and virtual public meetings.
- Press releases issued to local, regional and trade media.

- Paid-for newspaper advertising in the Camden New Journal to promote the public consultation and virtual public meetings.

4.12 To enable as many people as possible to contact the consultation team and comment on the proposals, a wide range of feedback mechanisms were used, including:

- A tear-off comment cards in the four-page consultation newsletter, to be completed and returned via Freepost to the consultation team.
- A dedicated email address – oriel@londoncommunications.co.uk.
- A Freephone consultation line – 0800 307 7967 – where voice messages could be left and a member of the consultation team would then return the call.
- A ‘chat box’ was available during each of the public online discussion meetings for attendees to type their questions. These were read out during the meeting and answered by relevant members of the project team. Attendees of the public online discussion meetings were also given the opportunity to raise their hand and address the project team in the meetings directly.
- An Oriel virtual assistant (chatbot) on the Oriel website allowed visitors to ask questions and provided real-time answers as well as prompting participants to give their views on the proposals.
- All questions were captured and responded to and the frequently asked questions (FAQs) were uploaded to the consultation website.

4.13 A total of 13 comment cards were submitted following the distribution of the two consultation newsletters to local residents and stakeholders.

4.14 A total of 31 emails were responded to by the Applicant and questions were also captured in the online FAQs document.

4.15 The most common themes and topics raised can be summarised as follows:

- Scale of building next to heritage buildings and homes
- Traffic impact on St Pancras Way and the drop-off point
- Access from local transport hubs and ‘the last half mile’
- The positive impact that this new building will have on the local area
- Benefits/opportunities for local people
- Sustainability of the new centre
- Questions about the development proposals for the remainder of the SPH site
- Cumulative construction impacts in the local area
- Mitigation measures to avoid anti-social behaviour and smoking from visitors

- 4.16 Responses to all the feedback received is set out in detail within the Statement of Community Involvement prepared by LCA Communications in support of the planning application.

Design Review Panel

- 4.17 The Applicant and project team presented to Camden's Design Review Panel on 24th April 2020 and 21st August 2020.

- 4.18 The feedback received from the first review panel on 24th April 2020 was supportive of the land use and the project aspirations, however the panel highlighted that a number of areas required further consideration. A copy of the summary is provided below:

“The development of a new home for Moorfields Eye Hospital and the UCL Institute of Ophthalmology provides an opportunity to create a landmark building, on a prominent site in Camden’s emerging Knowledge Quarter. The emerging proposals show a commitment by all involved to delivering healthcare, research and education facilities of the highest quality. However, the panel feels strongly that the next stage of design iteration should focus on the urban design and townscape qualities of the proposals. This should include clarification of the red line boundary, which the panel thinks should be expanded allow the scale and massing of the proposal to be adjusted to sit more comfortably in its context. Design thinking at this strategic scale should also address Camden’s aspiration for a north south route across the site, which should be as clear and legible as possible. The panel would encourage the production of a coordinated landscape masterplan for the wider development site. The panel highlights that Granary Street will become an important pedestrian route once the bridge link to King’s Cross is in place and is concerned the current proposal will have a negative impact on this street. The panel suggests sections and visuals through this and each of the adjoining streets and buildings will be helpful to describe and refine the quality of the proposal. The panel commends ground floor uses and would like to see more detail on the way these activate the building edge. The panel recognises that the architectural expression of the building is at an early stage of development, and would encourage further thought about how this can signal the national importance of Moorfields Eye Hospital as well as responding to and enhancing its context. Internally, it thinks the location of the oriel should be reconsidered, to maximise the feeling of space and light in the atrium. Environmental sustainability should also be integral to the architecture, and the panel asks the design team to carefully consider how the building is designed to respond to the climate crisis.”

- 4.19 In response to the Design Review Panel comments, the massing was refined further to respond better to the neighbouring buildings. The ‘nose’ of the building (north-east corner) was pushed back 2m from the original position to provide additional distance between the site and the emerging proposals to the east on the wider SPH site and to reduce the impact of the proposed building along Granary Street. In addition, the south eastern corner was set back by 3m to create a ‘shoulder’ to reduce the impact on the Victorian buildings to the south. The building footprint has also been moved 3m west towards St Pancras Way to accommodate a more generous public realm in the centre of the site and to create a more legible north-south route through the site. In addition, the rooftop plant was pulled back and wrapped in an aluminium louvre to create a coherent ribbon around the plant and therefore reducing the perceived height of the building.

- 4.20 In response to the comments relating to the lower ground and ground floor uses, the design team intensified the use of lower ground and ground floor to activate the public realm and provide views into and across the

building. This included an enlargement of the lower ground floor café at the southwest entrance. Surrounding the north east entrance, a collection of small retail units have also been added to accommodate the Friends of Moorfields Charity Shop, pharmacy and optician.

- 4.21 The feedback from the second review panel on 21st August 2020 was equally as supportive of the proposed land uses, however further comments were provided. The comments are summarised below.

“The development of a new home for Moorfields Eye Hospital and the UCL Institute of Ophthalmology provides an opportunity to create a landmark building, on a prominent site in Camden’s emerging Knowledge Quarter. The improved proposals show a commitment by all involved to delivering healthcare, research and education facilities of the highest quality. However, although significant progress has been made, the panel would like to see further refinement to ensure a contextual landmark building is created. Clear parameters for the wider masterplan should be outlined as part of this application. The panel acknowledges site and brief restrictions, but still has concerns about the scale of the proposals. It encourages further careful articulation of the building’s facades, in order to minimise its impact. This particularly applies to the corner of St Pancras Way and Granary Street, and to the frontage along Granary Street. The panel emphasises the importance of high quality, legible landscape within the applicant’s boundary, which should include street trees.”

- 4.22 In response to the second Design Review Panel, the design team have explored the massing further in relation to the comments received regarding the corner of Granary Street and St Pancras Way. As an alternative to setting back the massing, the rhythm and direction of the cladding on the façade on the corner of Granary Street and St Pancras Way is horizontal in orientation. This results in a change to the reflection and light qualities, thus mitigating the mass of the building at this point. In addition, the horizontal cornice line wrapping around the building at the fifth-floor parapet level creates the sense of the upper level slightly set back from below.
- 4.23 The application submission will include parameter plans for the wider masterplan to illustrate the aspirations for the whole site.
- 4.24 Additionally, the design team have worked alongside White Arkitekter to produce a high quality landscape scheme across the site with the inclusion of 16 replacement trees.

5. The Proposed Development

5.1 The following section outlines the details of the proposed development.

5.2 This application is for the following description of development:

“Demolition of one and two storey hospital buildings (Ash House, Bloomsbury Day Hospital, the Camley Centre, Jules Thorn Day Hospital, Kitchen Building and the Post Room & Former Mortuary) and construction of a part seven, part ten storey purpose-built eyecare, research and educational centre for Moorfields Eye Hospital, the UCL Institute of Ophthalmology and Moorfields Eye Charity.

New building to comprise a mixture of the following uses: clinical, research and education purposes, including accident and emergency (A&E) department, outpatients, operating theatres, research areas, education space, café and retail areas, facilities management, admin space and plant space.”

The Proposal

5.3 Full Planning Permission is sought for:

- Demolition of the existing one and two storey hospital buildings (Ash House, Bloomsbury Day Hospital, Camley Building, Jules Thorn Day Hospital, Kitchen Building and Post Room & Former Mortuary);
- More efficient use of a central London brownfield site through the erection of a single replacement building comprising part seven, part ten storey (including ground level and lower ground level, plus enclosed plant at roof level) (AOD 69.15m);
- Provision of 46,165 sqm GIA of purpose-built eyecare, research and education centre for Moorfields, UCL IoO and MEC;
- Introduction of 303 sqm GIA café/retail floorspace at lower ground and ground levels that is publicly accessible;
- Dedicated vehicular drop-off on St Pancras Way;
- The built form comprises two wings of accommodation around a central atrium – the central ‘Oriol’ provides an extension of the public realm at lower ground and floor, as well as a main vertical circulation space;
- Improve the quality of public realm and remove the high retaining wall to create permeable routes through the site;
- A south facing roof terrace on the sixth floor of the building for use by staff and students;
- Dedicated off-street servicing;
- Provision 502 cycle parking spaces; and

- A car free development, with 3 disabled parking spaces.

5.4 The new development will comprise of approximately 46,468 sqm (GIA) in total, representing an uplift in floorspace of approximately 40,459.33 sqm (GIA).

5.5 The proposed floorspace schedule is shown below in GIA (Table 5.1). This has been calculated based on the RICS Code of Measuring Practice (Sixth Edition):

| | Eyecare (sqm GIA) | Research (sqm GIA) | Education (sqm GIA) | Retail (sqm GIA) | Other – Plant, Core, Circulation etc. (sqm GIA) |
|--------------|--------------------------|---------------------------|----------------------------|-------------------------|--|
| L10 | 0 | 0 | 0 | 0 | 69 |
| L9 | 0 | 0 | 0 | 0 | 928 |
| L8 | 343 | 1,509 | 0 | 0 | 715 |
| L7 | 661 | 1,588 | 0 | 0 | 758 |
| L6 | 0 | 1,500 | 909 | 0 | 711 |
| L5 | 2,258 | 2,097 | 0 | 0 | 743 |
| L4 | 763 | 327 | 0 | 0 | 4,010 |
| L3 | 4,403 | 0 | 0 | 0 | 743 |
| L2 | 3,451 | 904 | 0 | 0 | 743 |
| L1 | 4,358 | 0 | 0 | 0 | 743 |
| G | 1,493 | 0 | 1,030 | 128 | 2,548 |
| LG | 2,090 | 0 | 0 | 175 | 3,770 |
| Total | 19,820 | 7,925 | 1,939 | 303 | 16,481 |
| | | | 46,468 | | |

Table 5.1: Proposed Floorspace Figures SQM GIA (P&P Areas per Floor Matrix Rev H dated 07.10.2020)

Proposed Land Uses

5.6 The proposed development will comprise 46,468 sqm GIA of purpose-built eyecare, medical research and educational facility for Moorfields, UCL IoO and MEC. The proposal seeks the co-location of the existing Moorfields at City Road and the UCL IoO at Bath Street into a purpose-built integrated facility at the SPH site. This will enable greater collaboration and innovation in the delivery of clinical care, research and education services. The co-location will reduce trips by patients and staff between various buildings at City Road and Bath Street.

- 5.7 The new building will contain the following departments and services: education, patient support services, staff only restaurant, outpatients and clinical support services, clinical research facility and dry labs, surgery, corporate admin and staff support, tech hub, private patient unit, wet labs, Cells for Sight, Biological Services Units ('BSU') and bioresources suite. The surgical facility is primarily an elective, ambulatory day care service, with a small volume of inpatient (overnight) and emergency surgery.
- 5.8 The proposal will also contain a 175 sqm GIA café at lower ground floor level which will be open to patients, staff and members of the public. In addition, 128 sqm GIA retail unit is proposed at upper ground floor level. These units provide active frontages to the lower levels of the building.

Scale and Massing

- 5.9 The building is comprised of three parts. Two wings embrace a central atrium which forms part of the public realm. Set back at the upper levels, a third element wraps around the north and east to reflect the changing scale of the existing and emerging context.
- 5.10 The proposed building will rise from seven storeys (lower ground, ground, plus 5 storeys) at the southwestern corner of the site to 10 storeys (lower ground, ground, plus 8 storeys and enclosed rooftop plant) at the north-eastern corner. In order to mitigate the impact of the building from street level, the building is set back at sixth floor level along the southern and eastern elevations. In addition, the rooftop plant is setback from the parapet and is surrounded by a continuous louvred screen to minimise the appearance of the plant from street level and surrounding properties.
- 5.11 As an alternative to setting back the massing, the rhythm and direction of the cladding on the façade on the corner of Granary Street and St Pancras Way is horizontal in orientation. This results in a change to the reflection and light qualities, thus mitigating the mass of the building at this point. In addition, the horizontal cornice line wrapping around the building at the fifth-floor parapet level creates the sense of the upper level slightly set back from below.
- 5.12 Further details on the scale and massing of the proposal are provided in the Design and Access Statement.

The Adaptive Building – Circular Economy

- 5.13 The building has been designed to be adaptable over its lifetime. This has led to the building being designed in two parts: firstly, the shell and core which comprises of the public realm, structure, façade, core and building wide plant and secondly, the internal fit-out which comprises the departmental layouts, internal finishes and department specific plant.
- 5.14 The building's inherent ability to adapt, ranges from small adaptations; to individual departmental layouts; to the reduction or expansion of a department; through wholesale adjustments to the building. The flat slab concrete frame provides flexibility in the arrangement of the structural grid and floor to floor heights which allows for the diversity of uses to occur anywhere in the building, subject to plant requirements.
- 5.15 In addition to the reasons set about above, the adaptability of the building is in part a response to the urgent climate crisis and the need to minimise waste and maximise the potential for reuse and recycling of elements or indeed the whole building. This concept of the circular economy is a key design principle for the building.

- 5.16 Further details on the adaptability of the building are set out within the Design and Access Statement and the Circular Economy Statement.

External Building Design

- 5.17 The façade of the building has been articulated to define a clear base, middle and top which responds to the scale of the neighbouring character.
- 5.18 The base of the building design is primarily comprised of curtain wall glazing to the public facing activities allowing for transparency and active frontages. However, along Granary Street, where more of the back-of-house facilities and loading bay are located, the building design is comprised of a continuous strip of louvres which provide necessary ventilation to the internal spaces.
- 5.19 The middle of the building comprises a combination of ceramic panels and glazing, organised in an oscillating pattern. At fourth floor level, a visual break is provided to coincide with the interstitial plant floor, aluminium louvres replace the ceramic panels. At sixth floor level, where the building sets back, the hit-and-miss pattern is varied to become more linear in appearance, the ceramic panels are replaced with glass shadow boxes and a ribbed aluminium spandrel creates a horizontality which contrasts with the more vertical patterning of the rest of the elevation.
- 5.20 At the top of the building, a continuous ribbon of aluminium louvres hides the mechanical rooftop plant. The screen is set back to reduce its impact at street level and is topped by a steel frame that supports photovoltaic panels.
- 5.21 Further details on the building design of the proposal are given in the Design and Access Statement.

Internal Building Layout

- 5.22 The lower ground floor comprises of the A&E department, radiology department, a café serving both users of the building and members of the public and back of house functions such as, bike storage, showers and lockers for staff, bulk pharmacy space and facilities management spaces. The lower ground floor is accessed via the southwest entrance off.
- 5.23 Early on in the design development, it became apparent that due to the topography of the site, it would be difficult to locate the A&E department anywhere except the lower ground floor and adjacent to St Pancras Way with direct access to the external patient transport drop-off. Granary Street has a considerable slope making it unsuitable for disembarking wheelchair bound patients and patients with other disabilities. By locating the radiology department at ground floor level, it enables easy accommodation of the specialist imaging equipment which requires localised reinforced construction of the slab and additional wall finishes. This equipment can be installed and removed through the external wall, accessed through the route down to the bike store.
- 5.24 The upper ground floor is accessed using the northeast entrance. This level contains the main reception, patient services and a number of public facing facilities including space for the Friends of Moorfield and MEC, as well as temporary exhibition space, retail space and optometry dispensing. At ground floor level the southern wing comprises education space, containing conventional teaching space for conferences and workshops, a lecture theatre accommodating up to 70 people and a cluster of 4 classrooms, which can also

be configured as a pair or a single space. The northern wing comprises clinical spaces, the loading bay accessed off Granary Street and facilities management spaces.

- 5.25 The first floor comprises clinical spaces with smaller clinical support services such as ocular prosthetics and optometry. At second floor level, the north wing comprises clinical outpatient space with electrodiagnostic imaging at the northeast corner and the south wing comprises two research departments; the Clinical Research Facilities ('CRF') and UCL 'dry lab' space.
- 5.26 At third floor level, both wings are occupied by surgical facilities with a small patient overnight stay unit. The fourth floor is primarily mechanical and electrical plant required to service the different departments, by locating it in the centre of the building, vertical ductwork and riser runs are minimised. Of particular benefit is the ability to service the operating theatres directly through the ceiling to the floor below. Also located on at fourth floor level is the tech hub, a shared facility between Moorfields and UCL IoO that aims to promote interaction and collaboration.
- 5.27 At fifth floor level, the south wing provides private patient clinical facilities. Meanwhile the north wing at both fifth and sixth floor levels comprises medical research wet labs facilities. The southern wing at sixth floor level provides the remaining education facilities, this includes a library for Oriel's staff and researchers, range of flexible teaching spaces and simulation room for medical training. The sixth floor is where the building steps back to create a roof terrace on the south west of each wing. This roof terrace is for use by staff and students and can be accessed from the staff café to the north or the education suite to the south.
- 5.28 The seventh floor comprises research space for UCL and office space for the management and administration of Oriel. The eighth floor, the top floor of the building, comprises a range of specialist medical research facilities. This includes the 'BSU', Cells for Sight and Bioresource Suite. The first two facilities are heavily serviced spaces requiring large amounts of mechanical plant which is located on the roof immediately above each area, saving on vertical ductwork and riser runs throughout the building. The BSU also has a designated area at ground floor level to house the vacuum bedding system, this system also penetrates the roof and there is a designated plant area for this within the plantroom above.
- 5.29 Further details on the internal building layout are set in the Design and Access Statement.

Materials

- 5.30 The material palette has been informed by an analysis of the surrounding context. Only high-quality materials and finishes, appropriate to this context and the quality of the proposal will be used.
- 5.31 The lower ground and ground floor level facades are proposed to be a combination of curtain walling, solid precast concrete panels and ceramic panelling. The façade for the upper floors of the building comprises a glazed unitised system of cladding, with clear and ceramic frit glazing, glazed and unglazed terracotta profiled panels and anodised aluminium fins.
- 5.32 By adopted a unitised façade system, at the construction stage it will arrive at the site as a prefabricated system, preassembled in the factory. This enables it to be quickly and efficiently lifted and bolted into place, saving time and resources, as well as space required for storage and assembly.
- 5.33 Further details on the proposed materials are given in the Design and Access Statement.

Landscaping and Public Realm

- 5.34 The existing trees within the site are predominantly semi mature to mature and in fair to good condition. It is proposed that 13 tree features will be removed to facilitate the proposed development; this includes 3 individual trees classed as moderate quality (Category B) including T29 which is subject to a TPO and 8 individual trees and 2 groups of trees classes as low quality (Category C). These will be replaced with a comprehensive landscaping strategy, which includes 16 new trees. A further two trees are shown indicatively within the KCCLP public realm.
- 5.35 **Figure 5.1** shows the Oriel application red line boundary, this includes the intended Oriel site ownership as well as land to accommodate necessary demolition works and access routes. **Figure 5.1** also demonstrates the indicative landscaping proposals for the land immediately surrounding the proposed building, these proposals are shown in detail as this land falls within the 2-acre boundary subject to the formal option agreement by the Oriel partners. This is where the proposed 16 replacement trees will be located. However, on the southern and eastern parts of the Oriel site, there proposals represent interim landscaping arrangements which will ultimately be superseded when proposals for the remainder of the SPH site come forward. The final design for these parts of the Oriel site will be applied for as part of that future planning application. Land which forms part of the wider masterplan is shown hatched, the landscaping proposals within this area are in abeyance as it is subject to a future planning permission condition.



Figure 5.1: Indicative Landscaping Proposals (White Arkitekter, Drawing Ref: ORL- WHA- ZZ- GF- DR- L- 110010)

- 5.36 The submitted landscape proposal will open up new publicly accessible spaces within the site and create new public connections across it. The landscaping has been designed to respond to the layout of the development, the topography of the site and the characteristics of the site and the local context.
- 5.37 The hard landscaping is considered to be of high quality and the proposed layout of steps, beds and benches and the interaction between them is varied and informal in nature, adding character to the open spaces. Soft landscaping is proposed in the form of planters located around the site together with new tree planting.
- 5.38 The public realm surrounding the southwest entrance comprises a variety of planters and benches. The external route from south to north is interspersed with trees and benches, this terminates by the northeast entrance with the presence of a large planter with integrated seating. A number of street trees are proposed along St Pancras Way at either end of the drop-off bay, meanwhile Granary Street will be used for servicing the building.
- 5.39 The atrium forms a new internal public realm, during the buildings opening hours it will provide a publicly accessible route through the site from the south western corner to the north eastern corner. The atrium is a tall, naturally lit space which provides public facilities such as café, retail, education and exhibitions publicising the work of Moorfields and UCL IoO. At the heart of the atrium is the reception area where patients can check-in, ask directions and book patient transport. Rising up through the centre of the atrium is 'the Oriel', a rising stack of floorplates containing the main public lifts and stairs, connecting to the various departments via bridges at each level. As well as facilitating connections between departments, 'the Oriel' also provides small waiting areas and informal meeting spaces at the various levels depending on the department it serves.
- 5.40 At sixth floor level, the building steps back to create a roof terrace on the south west of each wing. This roof terrace is for use by staff and students and can be accessed from the staff café to the north or the education suite to the south. The space will be used for working outdoors, outdoor teaching, relaxing, urban gardening and social events. The roof terrace will contain a variety of perennial plants, shrubs and small trees. The selected plants will be suitable for the harsher living conditions of the roof.
- 5.41 The elevator shaft of the west core will be covered with a brown roof with PV panels to maximise the biodiversity and ecological value. In order to further increase the biodiversity of the site, it is proposed to install a series of artificial habitats for birds, bats and insects on the green roofs.
- 5.42 Further details on the landscaping and public realm are set out in the Design and Access Statement and Landscaping Design Report.

Lighting

- 5.43 New lighting is proposed for exterior areas including the public realm at lower ground and ground floor levels and the external roof terraces on the sixth floor in order to provide for safe access and use of the site. The proposed lighting ranges from predominantly functional lighting supplied by pole top and directional multi head columns to accent lighting for building canopies, tree canopies, low planting and street furniture.
- 5.44 Further details on the lighting are set out in the External Lighting Assessment.

Access and Circulation

- 5.45 The site layout has been designed to enhance access through the area and complement the surrounding proposals, improving connections to the site of the Ugly Brown Building to the north, the proposed new canal crossing between the 101 and 103 Camley Street developments to the east and St Pancras Gardens to the south.
- 5.46 People arriving can enter the building from one of two entrances – the lower ground entrance to the south-west accessed off the new public square, and the upper entrance located to the north-east also accessed off a new public square. Both entrances lead to the reception area in the atrium. The atrium provides a route through the wider side and is conceived as part of the public realm, during opening hours it can be used by members of public as well as patients and staff.
- 5.47 In terms of internal circulation, patients, visitors and students will primarily use the lift and stair core within ‘the Oriel’ to access the different departments of the buildings. For private patients, there is a separate entrance off the atrium which leads to the lift and stair core within the south wing. Members of staff will also benefit from the use of the west, north and east lift and stair cores, enabling movement between departments without intersecting with patient circulation.
- 5.48 There will be 6 lifts within ‘the Oriel’, all of these lifts rise from the lower ground floor to the fifth floor, 3 of the lifts also go onto the seventh floor. ‘The Oriel’ will have a prominent stair designed for maximum ease of use and to encourage its use over use of the lift. From lower ground to upper ground, there will be a feature stair creating a link between the two publicly accessible levels of the building.
- 5.49 The north core will contain 1 passenger lift, 1 goods lift, and 1 lift dedicated to the transport of material required for the BSU. The east core will contain 1 passenger lift and 1 goods lift. The west core will contain 2 passenger lifts; however, one will be dedicated to the movement of private patient units to the surgical ward. Each of these cores has a stair for everyday use by staff.
- 5.50 Further details on the access and circulation arrangements are set out in the Design and Access Statement.

Cycle Parking

- 5.51 The proposal will provide a total of 390 long-stay cycle parking spaces and 112 short-stay cycle parking spaces. The long-stay cycle parking will be located in the south-east corner of the building with its own separate entrance. The short-stay cycle parking will be provided within the public realm.

Car Parking

- 5.52 It is proposed that the development will not include any general car parking provision, this is consistent with the existing Moorfields Hospital and UCL IoO buildings at City Road. However, 3 blue badge bays will be provided along the shared surface route to the south of the proposed building and accessed via St Pancras Way. The spaces will be reserved for staff only and will have to be booked prior to use. No blue badge parking will be provided for patients, although blue badge holders are permitted to park in pay & display spaces free of charge or on single yellow lines.

Drop-off/Pick-up Facility

- 5.53 A combined Non-Emergency Patient Transport (NEPT) and car/taxi drop-off and pick-up facility will be provided on St Pancras Way. The drop-off/pick-up bay will be 40m long and 5.5m wide and separated from the main carriageway by a 0.75m wide traffic island. This will provide sufficient width for one lane of parking and space for vehicles to manoeuvre within the bay. Vehicles using the bay will enter at the north and exit from the south. The carriageway on St Pancras Way would be reduced to 5.5m along the length of the drop off bay, still providing sufficient to retain two lanes. The proposed bay would provide the required space for NEPT vehicles and space for 4 cars/taxis. Additional informal car/taxi drop-off and pick-up space will be available on Granary Street, providing convenient access to the north-east building entrance, although no formal bays will be provided.
- 5.54 It is understood that LBC has an aspiration to complete the cycle lane on St Pancras Way, a future 2m wide cycle lane could be incorporated by reducing the carriageway to a single 3.5m wide lane. The proposed drop-off/pick-up facility for the proposed development on St Pancras Way has been designed to accommodate a cycle lane in the future.
- 5.55 The proposed drop off bay arrangement would require a section of the existing public highway to be stopped up, and the pedestrian route on St Pancras Way within the site would be offered for adoption by the highway authority.

Delivery and Servicing

- 5.56 A dedicated service area is proposed within the building envelope on the northern site of the site, accessed from Granary Street. The service area includes 4 bays with 2 suitable for LGVs and 2 suitable for HGVs and has been designed so that all vehicles are able to enter and exit in a forward gear.

Refuse Storage and Collection

- 5.57 The proposed development is anticipated to produce approximately 233,882 litres of recycling and waste material per week, equating to approximately 1,438 tonnes of recycling and waste material per year. The proposed development will have one main bin store for wheeled bins which will contain the following; 23 x 770 L healthcare bins, 12 x 1,100 L paper bins, 1 x 1,100 L metal can bin, 12 x 120 L food bins and 2 x 240 L glass bins. There will also be an auxiliary waste store adjacent to the loading bay for additional wheeled bins (9 x 1,100 L plastic bins), a cardboard baler and 3 x cardboard bales. Separate bin stores are provided for the BSU waste (2 x 1,100 L bins) and chemical waste. A residual waste compactor will also be situated in the loading bay. The bin store design will enable the segregation of the following recycling streams: plastics, metal, cardboard, paper, glass, healthcare, hazardous waste, and food waste. With separate space provisions provided for Adhoc recycling streams such as batteries, textiles and bulky waste.
- 5.58 All waste stores and compactor volume have been designed to provide sufficient capacity to hold and manage the waste arisings for the proposed development, based on daily collections of plastics, metals, paper and healthcare waste (based on two-day storage capacity), a twice weekly collection of glass and food waste (with an additional day's storage capacity), a once every four day collection of a residual waste compactor, and a weekly collection of cardboard bales and hazardous waste (with additional day's storage capacity).

5.59 For further details please refer to the Operational Recycling and Waste Management Strategy submitted in support of the application.

Wider St Pancras Hospital Site – Parameter Plans

5.60 King’s Cross Central Limited Partnership (‘KCCLP’) is the development partner of the C&I Trust and they intend to submit a planning application for the remaining part of the SPH site in 2021. The design is at an early stage; however, it is currently envisaged that the development will retain the existing Chapel, Gatehouse and Workhouse buildings. The buildings to the east of the Site would be demolished and replaced by new buildings. It is currently anticipated that planning permission will be sought for a mix of uses including employment, residential and retail/food and drink, as well as some healthcare and office facilities for the C&I Trust.

5.61 A set of ‘parameters plans’ showing possible future redevelopment of the remainder of the SPH site are submitted in support of the Oriel application. These parameters plans are merely illustrative and for information only.

5.62 The parameter plans illustrate a possible emerging scheme alongside the Oriel proposals and ensure a coherent approach across the two development schemes, and to prove that the Oriel development will not fetter the future redevelopment of the KCCLP land.

5.63 These parameters plans have been prepared by Bennetts, KCCLP’s architect, in conjunction with the Oriel team and are based on the scheme shown to Camden by KCCLP during the joint landowner meetings with Camden.

5.64 The 3 different parameters plans show the following:

| Plan Number | Content |
|------------------|---|
| Parameter Plan 1 | <ul style="list-style-type: none"> • Building retention (heritage buildings) • Building demolition as part of Oriel development • Building demolition as part of KCCLP development |
| Parameter Plan 2 | <ul style="list-style-type: none"> • Development Zones (DZ) • Uses/range of uses within each DZ • Indicative maximum building heights |
| Parameter Plan 3 | <ul style="list-style-type: none"> • Routes/circulation • Open spaces/public realm • Links through into St Pancras Gardens, Ted Baker Site and Canal • Servicing |

6. Relevant Planning Policies

- 6.1 This section provides an overview of national, regional and local policies and other material considerations against which the planning application will be assessed (see **Figure 6.1**).
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the Development Plan unless material considerations indicate otherwise. Where there is a difference in policy, Section 38(5) requires that the most recently adopted policy takes precedence.
- 6.3 The Statutory Development Plan for LBC comprises the following documents:
- The Camden Local Plan (adopted July 2017); and
 - The Camden Site Allocations Local Development Document (2013); and
 - The London Plan: The Spatial Development Strategy for London Consolidated with Alternations since 2011 (adopted March 2016).
- 6.4 LBC is under legal duty to have regard to all material considerations. This includes the Government's National Planning Policy Framework (NPPF) (February 2019), National Planning Practice Guidance (NPPG) (2016), and the requirements of all relevant Circulars. This also includes Supplementary Planning Guidance and Documents (SPGs and SPDs) produced by LBC and the GLA.
- 6.5 The Intend to Publish London Plan (December 2019) sets out the proposed development strategy for London from 2019 to 2041. On 13th March 2020, the Secretary of State issued a set of directions under Section 337 of the Greater London Authority Act 1999 (as amended). As such, the plan is now a material consideration in the determination of applications. The weight attributed to the document is a matter for the decision-maker. The closer the document is to adoption, the greater the weight that should be applied.

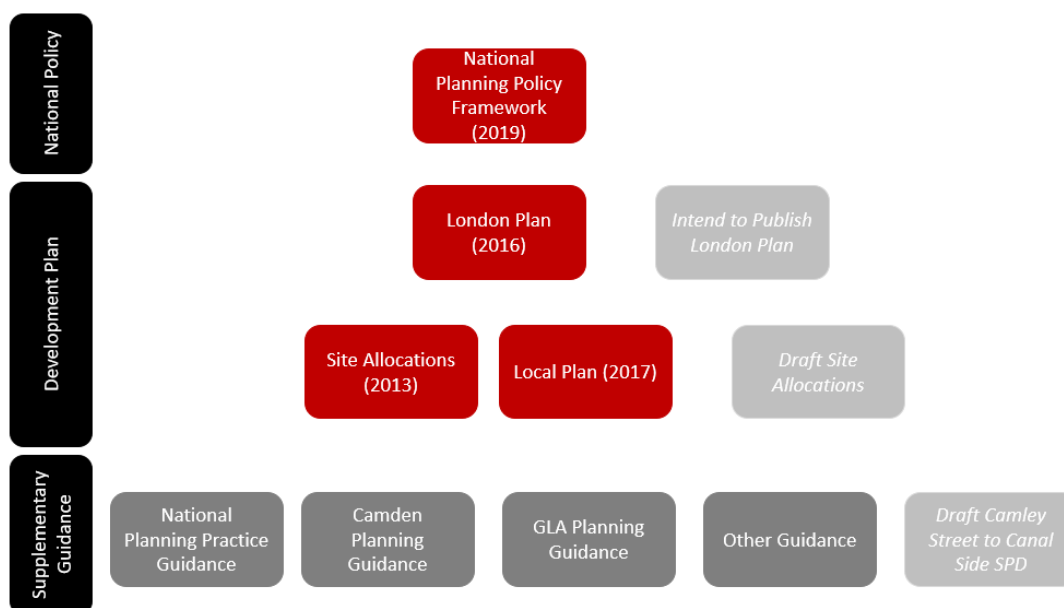


Figure 6.1: National, Regional and Local Policies and Other Material Considerations

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 6.6 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66(1) of the Act requires decision makers to ‘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’ when determining applications which affect a listed building or its setting. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay ‘special attention...to the desirability of preserving or enhancing the character or appearance of that area’.

National Planning Policy Framework (NPPF)

- 6.7 A revised National Planning Policy Framework (NPPF) was published on 19 February 2019. In determining planning applications, regard must now be given to the NPPF which sets out the Government’s planning policies in England and how these should be applied.

- 6.8 Paragraph 2 of the NPPF requires that:

“Applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.”

Achieving Sustainable Development

- 6.9 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 sets out the three overarching objectives to achieving sustainable development:

“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

- 6.10 Paragraph 11 sets out the presumption in favour of sustainable development. *“For **decision-taking** this means:*

c) Approving development proposals that accord with an up-to-date development plan without delay; or

- d) *Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

 - i. *The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.**

Making Effective Use of Land

- 6.11 Paragraph 117 indicates that *“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.”*
- 6.12 Paragraph 118 sets out that *“planning policies and decision should:

 - a) *encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;*
 - b) *recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;*
 - c) *give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;*
 - d) *promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and*
 - e) *support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards) and can maintain safe access and egress for occupiers.”**

Promoting Healthy and Safe Communities

- 6.13 Paragraph 91 indicates that *“planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

 - f) *promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong**

neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

- g) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas; and*
- h) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”*

6.14 Paragraph 92 goes on to say that in order “*to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

- a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*
- b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*
- c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;*
- d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and*
- e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.”*

Building a Strong, Competitive Economy

6.15 Paragraph 80 sets out that “*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.*”

6.16 Paragraph 82 adds that “*Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.*”

Achieving Well-Designed Places

- 6.17 Section 12 of the NPPF is committed to achieving well-designed places. Paragraph 124 stipulates that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve, and that good design is a key aspect of sustainable development, creating better places in which to live and work and helps make development acceptable to communities.
- 6.18 Paragraph 127 states *“Planning policies and decisions should ensure that developments:*
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁶; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*
- 6.19 NPPF Paragraph 131 states that *“great weight should be given to innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in which the overall form and layout of their surroundings.”*

Conserving and Enhancing the Historic Environment

- 6.20 Section 16, ‘Conserving and Enhancing the Historic Environment’, Paragraphs 184-202, relate to developments that have an effect upon the historic environment.
- 6.21 In order to determine applications for development, Paragraph 189 of the NPPF states that LPAs should require applicants to describe the significance of the heritage assets affected and the contribution made by their setting. Adding that the level of detail provided should be proportionate to the significance of the asset and sufficient to understand the impact of the proposal on this significance.
- 6.22 Paragraph 193 emphasises that when a new development is proposed, great weight should be given to the asset’s conservation and that the more important the asset, the greater this weight should be. It is noted within this paragraph that significance can be harmed or lost through the alteration or destruction of the heritage asset or by development within its setting.
- 6.23 Paragraph 196 advises that where a development will cause less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

- 6.24 Paragraph 197 notes that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. Adding, that in weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset
- 6.25 In addition, Paragraph 200 notes that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Adding, proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.
- 6.26 Paragraph 201 importantly clarifies that not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Adding, loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

Environment, Energy and Sustainability

- 6.27 Section 14 of the NPPF is committed to meeting the challenge of climate change, flooding and coastal change. Paragraph 150 requires that new development is planned for in ways that:
- “a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and*
- b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.”*
- 6.28 Paragraph 154 goes on to state that, in determining planning applications for renewable and low carbon development, local planning authorities should:
- “a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and*
- b) approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.”*
- 6.29 In relation to flood risk, Paragraph 163 requires development in areas at risk of flood where it can be demonstrated that:
- “a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*

- b) the development is appropriately flood resistant and resilient;*
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
- d) any residual risk can be safely managed; and*
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.”*

6.30 Paragraph 165 requires major developments to incorporate sustainable drainage systems, unless there is clear evidence that this would be inappropriate.

Transport

6.31 Section 9 of the NPPF promotes sustainable transport.

6.32 Paragraph 109 states that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*

6.33 Paragraph 110 states that applications for development should:

“a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”

6.34 Paragraph 111 indicates that *“all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.”*

Implementation and Planning Obligations

6.35 Paragraph 54 states that *“Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.”*

6.36 Paragraph 55 notes that *“Planning conditions should be kept to a minimum and only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.”*

6.37 Paragraph 56 goes on to state that “*Planning obligations should only be sought where they meet all of the following tests:*

- *necessary to make the development acceptable in planning terms;*
- *directly related to the development; and*
- *fairly and reasonably related in scale and kind to the development.”*

The London Plan: The Spatial Development Strategy for London Consolidated with Alterations Since 2011

6.38 The London Plan is the overall strategic plan for London. It sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2036 and forms part of the Development Plan for Greater London. London Boroughs’ Local Plans should be in general conformity with the London Plan, and its policies guide decisions on planning applications by Councils and the Mayor. The London Plan has been consolidated with alterations since its initial publication in 2011 and the relevant policies are set out below.

London’s Spatial Strategy

6.39 Policy 2.1 (London in its Global, European and United Kingdom Context) seeks to ensure that London Retains and extends its global role as a sustainable centre for business, innovation, creativity, health, education and research, culture and art and as a place to live, visit and enjoy. The development of London should support the spatial, economic, environmental and social development of Europe and the UK, in particular ensuring that London plays a distinctive and supportive part in the UK’s network of cities.

6.40 Policy 2.9 (Inner London) seeks to ensure that the potential of inner London is realised in a way that sustains and enhances its economic and demographic growth whilst also improving its distinct environment, neighbourhoods and public realm. It also seeks to ensure an improving quality of life and health for those living, working, studying and visiting.

Community Facilities

6.41 Policy 3.1 (Ensuring Equal Life Chances for All) sets out that development proposals should protect and enhance facilities and services that meet the needs of particular groups and communities. Proposal involving loss of these facilities without adequate justification or provision for replacement should be resisted.

6.42 Policy 3.2 (Improving Health and Addressing Health Inequalities) requires developments to be designed, constructed and managed in way that improve and promote healthy lifestyles to help to reduce health inequalities.

6.43 Policy 3.16 (Protection and Enhancement of Social Infrastructure) sets out that development proposals which provide high quality social infrastructure will be supported in light of local and strategic social infrastructure needs assessments. Proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted. The suitability of redundant social infrastructure premises for other forms of social infrastructure

for which there is a defined need in the locality should be assessed before alternative developments are considered. Proposed facilities should be accessible to all sections of the community (including disabled and other people) and be located within easy reach by walking, cycling and public transport. Wherever possible the multiple use of premises should be encouraged.

- 6.44 Policy 3.17 (Health and Social Care Facilities) indicates that development proposals which provide high quality health and social care facilities will be supported in areas of identified need, particularly in places easily accessible by public transport, cycling and walking. Where local health services are being changed, the Mayor will expect to see replacement services operational before the facilities they replace are closed, unless there is adequate justification for the change. Relevant development proposals should take into account the Mayor's Best Practice Guidance on Health Issues in Planning.
- 6.45 Policy 3.18 (Education Facilities) sets out that development proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to educational purposes. Proposals which result in the net loss of education facilities should be resisted, unless it can be demonstrated that there is no ongoing or future demand. Development proposals that encourage co-location of services should be encouraged in order to maximise land use and reduce costs.

London's Economy

- 6.46 Policy 4.1 (Developing London's Economy) seeks to promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost.

Retail

- 6.47 Policy 4.7 (Retail and Town Centre Development) supports development for retail, commercial, cultural and leisure development in town centres.
- 6.48 Policy 4.8 (Supporting a Successful and Diverse Retail Sector and Related Facilities and Services) promotes sustainable access to the goods and services that Londoners need.

Design

- 6.49 Policy 7.1 (Lifetime Neighbourhoods) indicates that developments should be designed so that the layout, tenure and mix of uses interface with the surrounding land. Development should enable people to live healthy lives and contribute towards people's sense of place, safety, and security. The design of buildings and their surroundings should reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood.
- 6.50 Policy 7.2 (An Inclusive Environment) requires the principles of inclusive design to have been integrated into the proposed development. The Mayor promotes world-class, high quality architecture and design. A Design and Access Statement should be submitted in support of a planning application to demonstrate the above.
- 6.51 Policy 7.3 (Designing Out Crime) stipulates that development should be consistent with the principles of 'Secured by Design', 'Designing out Crime' and 'Safer Places' guidance to create safe, secure, and appropriately accessible environments where crime and disorder and the fear of crime do not undermine

quality of life or community cohesion. Developments should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.

- 6.52 Policy 7.4 (Local Character) requires development to have regard to the form, function and structure of an area, place or street and the scale, mass, and orientation of surrounding buildings. Buildings, streets, and open spaces should provide a high-quality design response enhancing the character and function of the area.
- 6.53 Policy 7.5 (Public Realm) indicates that development should make the public realm comprehensive at the human scale, using gateways, focal points and landmarks as appropriate to help people find their way. Landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and contribute to the easy movement of people through space. Development should incorporate local social infrastructure such as public toilets, drinking water fountains and seating, where appropriate.
- 6.54 Policy 7.6 (Architecture) indicates that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.
- 6.55 Policy 7.7 (Location and Design of Tall and Large Buildings) states that tall and large buildings should:
- a) generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport;*
 - b) only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building;*
 - c) relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;*
 - d) individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London;*
 - e) incorporate the highest standards of architecture and materials, including sustainable design and construction practices;*
 - f) have ground floor activities that provide a positive relationship to the surrounding streets;*
 - g) contribute to improving the permeability of the site and wider area, where possible;*
 - h) incorporate publicly accessible areas on the upper floors, where appropriate;*
 - i) make a significant contribution to local regeneration.”*

Heritage

- 6.56 Policy 7.8 (Heritage Assets and Archaeology) states that development should identify, value, conserve, restore, re-use and incorporate heritage assets. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural

detail. New development should make provision for the protection of archaeological resources, landscapes and significant memorials.

Environment, Energy and Sustainability

6.57 Chapter 5 of the London Plan covers London's response to Climate Change. Policy 5.1 (Climate Change Mitigation) seeks to achieve an overall reduction in London's carbon dioxide emissions of 60 per cent (below 1990 levels) by 2025.

6.58 Policy 5.2 (Minimising Carbon Dioxide Emissions) requires development proposals to make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

- i. Be lean: use less energy;
- ii. Be clean: supply energy efficiently; and
- iii. Be green: use renewable energy.

The policy seeks to ensure that major developments meet the Target Emission Rate outlined in the national Building Regulations. For Non-domestic buildings this means complying with building regulation requirements. Major development proposals should include a detailed energy assessment demonstrating how the target will be met in accordance with the energy hierarchy. Carbon reduction targets should be met on-site, any shortfall may be provided off-site or through a cash in lieu contribution to the relevant borough to be ring fenced to secure delivery of carbon dioxide savings elsewhere.

6.59 Policy 5.3 (Sustainable Design and Construction) requires the highest standard of sustainable design and construction. Major developments should demonstrate that sustainable design standards are integral to the proposal and should meet the minimum standards outlined in the Mayor's SPG.

6.60 Policy 5.5 (Decentralised Energy Networks) sets out that the Mayor expects 25% of the heat and power used in London to be generated using localised decentralised energy systems by 2025. To achieve this the Mayor prioritises the development of decentralised heating and cooling networks. Developers are required to prioritise connection to existing or planned decentralised energy networks where feasible.

6.61 Policy 5.6 (Decentralised Energy in Development Proposals) requires development proposals to evaluate the feasibility of Combined Heat and Power (CHP) systems and select systems in accordance with a specified hierarchy which prioritises connection to existing heating or cooling networks in the first instance.

6.62 Policy 5.7 (Renewable Energy) seeks to increase the proportion of energy generated from renewable sources through on-site renewable energy generation, where feasible.

6.63 Policy 5.8 (Innovative Energy Technologies) supports and encourages widespread use of innovative energy technologies to reduce carbon dioxide emissions.

6.64 Policy 5.9 (Overheating and Cooling) requires major development proposals to reduce potential overheating and reliance on air conditioning systems. Major development proposals should demonstrate how the design, materials, construction and operation of the development would minimise overheating and also meet its cooling needs.

- 6.65 Policy 5.10 (Urban Greening) sets out that development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including tree planting, green roofs and walls and soft landscaping.
- 6.66 Policy 5.11 (Green Roofs and Development Site Environs) seeks major development proposals to include roof, wall and site planting, especially green roofs and walls, where feasible.
- 6.67 Policy 5.12 (Flood Risk Management) requires development proposals to comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical guidance on flood risk.
- 6.68 Policy 5.13 (Sustainable Drainage) states that development should utilise sustainable urban drainage systems ('SuDS') unless there are practical reasons for not doing so and should aim for run-off rates in line with the drainage hierarchy.
- 6.69 Policy 5.14 (Water Quality and Wastewater Infrastructure) seeks to ensure that development proposals have adequate wastewater infrastructure capacity.
- 6.70 Policy 5.15 (Water Use and Supplies) states that development should minimise the use of mains water by incorporating water saving measures and equipment.
- 6.71 Policy 5.21 (Contaminated Land) sets out that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.
- 6.72 Policy 7.13 (Safety, Security and Resilience to Emergency) indicates that development proposals should contribute to the minimisation of potential physical risks, including those arising as a result of fire, flood and related hazards. Development should include measures to design out crime that, in proportion to the risk, deter terrorism, assist in the detection of terrorist activity and help defer its effects.
- 6.73 Policy 7.14 (Improving Air Quality) requires development proposals to minimise exposure to existing poor air quality and make provision to address local problems of air quality. The design and construction of new development should reduce emissions from the demolition and construction of the building. Development should be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality.
- 6.74 Policy 7.15 (Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes) states that development proposals should seek to manage noise by avoiding, mitigating and minimising potential adverse impacts from noise.
- 6.75 Policy 7.19 (Biodiversity and Access to Nature) indicates that development should, wherever possible, make a positive contribution to the protection, enhancement and management of biodiversity.
- 6.76 Policy 7.21 (Trees and Woodland) sets out that existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree'. Wherever possible, the planting of additional trees should be included in new developments, particularly large-canopied species.

Transport

- 6.77 Chapter 6 of the London Plan relates to London’s transport. Policy 6.3 (Assessing Effects of Development on Transport Capacity) seeks to ensure that impacts on transport capacity and the transport network are fully assessed, and that development should not adversely affect safety on the transport network. Transport Assessments will be required in accordance with TfL’s Transport Assessment Best Practice Guidance for major planning applications. Workplace travel plans should be provided for planning applications exceeding the thresholds in the relevant TfL guidance. In addition, construction logistics plans and delivery and servicing plans should be secured in line with the London Freight Plan and should be co-ordinated with travel plans.
- 6.78 Policy 6.5 (Funding Crossrail and Other Strategically Important Transport Infrastructure) states that in view of the strategic regional importance of Crossrail to London’s economic regeneration and development, and in order to bring the project to fruition in a suitably timely and economic manner, contributions will be sought from developments likely to add to or create congestion on London’s rail network that Crossrail is intended to mitigate. The Mayor has produced guidance on the Use of Planning Obligations in the Funding of Crossrail which should be taken into account in the handling of planning applications.
- 6.79 Policy 6.9 (Cycling) requires development to provide secure, integrated, convenient and accessible cycle parking facilities in accordance with the minimum standards, as well as providing on-site changing and shower facilities. The cycle parking standards are set out in **Table 6.1** below.

| Land Use | Long-stay | Short-stay |
|-------------------------------|--|---|
| A1 – Non-Food Retail | From a threshold of 100sqm: first 1000 sqm: 1 space per 250 Thereafter: 1 space per 1000sqm | From a threshold of 100 sqm: first 1000 sqm: 1/125 sqm, thereafter: 1/1000 sqm |
| A2-A5 | From a threshold of 100 sqm: 1 space per 175 sqm | |
| B1 – Research and Development | 1 space per 250 sqm | 1 space per 1,000 sqm |
| C2 – Hospitals | 1 space per 5 staff | 1 space per 30 staff |
| D1 – University and Colleges | 1 space per 4 staff + 1 space per 20 FTE students | 1 space per 7 FTE students |

Table 6.1: Cycle Parking Minimum Standards

- 6.80 Policy 6.10 (Walking) seeks to ensure a high-quality pedestrian environment in accordance with TfL’s Pedestrian Design Guidance.
- 6.81 Policy 6.13 (Parking) states that the Mayor seeks to strike an appropriate balance between promoting new development and preventing excessive car parking provision. Developments in all parts of London must ensure that 1 in 5 spaces provide an electrical charging point, disabled parking must be provided, and the development must provide for the delivery and servicing needs.

Planning Obligations

- 6.82 Policy 8.2 (Planning Obligations) sets out that when considering planning applications, the Mayor will take into account the economic viability of each development concerned, the existence and content of planning obligations. Development proposals should address strategic as well as local priorities in planning

obligations. Importance should also be given to tackling climate change and air quality, social infrastructure and the provision of small shops.

- 6.83 Policy 8.3 (Community Infrastructure Levy) ensures the effective implementation of the Community Infrastructure Levy ('CIL').

The Camden Local Plan

- 6.84 The Camden Local Plan is the key strategic document in Camden's development plan. It sets out the vision for shaping the future of the Borough and contains policies for guiding planning decisions.

Delivery and Location of Growth

- 6.85 Policy G1 (Delivery and location of growth) sets out that the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden. LBC will support development that makes best use of its sites, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site. LBC will resist development that makes inefficient use of land. Where appropriate, Policy G1 encourages the provision of a mix of uses. Development is expected to take place throughout the borough, with the most significant growth expected to be delivered through a concentration in the growth areas, development at other highly accessible locations and the Council's Community Investment Programme (CIP).

Community Facilities

- 6.86 Policy C1 (Health and Wellbeing) seeks to improve and promote strong, vibrant and healthy communities through ensuring a high-quality environment with local services to support health, social and cultural wellbeing and reduce inequalities. Measures that will help contribute to healthier communities and reduce health inequalities must be incorporated into developments, where appropriate. LBC require developments to positively contribute to creating high quality, active, safe and accessible places. Proposals for major development schemes should include a Health Impact Assessment (HIA). Policy C1 supports the provision of new or improved health facilities in line with Camden's Clinical Commissioning Group and NHS England requirements.
- 6.87 Policy C2 (Community Facilities) sets out that the Council will work with its partners to ensure that community facilities and services are developed and modernised to meet the changing needs of the community. The Council will support the investment plans of educational, health, scientific and research bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK. In assessing such proposals, the Council will also balance the impact that proposals may have on residential amenity and transport infrastructure. Development proposals should seek to ensure inclusion of measures which address the needs of community groups and foster community integration.

Policy C2 also seeks to ensure that existing community facilities are retained recognising their benefit to the community, unless one of the following tests is met:

- i. *"A replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended, users;*

- ii. *The existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local area. Where it has been demonstrated to the Council's satisfaction that there is no reasonable prospect of a community use, then our preferred alternative will be the maximum viable amount of affordable housing.*"

6.88 Policy C5 (Safety and Security) aims to make Camden a safer place. This policy requires developments to demonstrate that they have incorporated design principles which contribute to community safety and security. Where a development has been identified as being potentially vulnerable to terrorism, the Council expect counter-terrorism measures to be incorporated into the design of buildings and associated public areas to increase security.

6.89 Policy C6 (Access of all) seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. All buildings and places should meet the highest practicable standards of accessibility and inclusive design so that they can be used safely, easily and with dignity by all. Facilities should be located in the most accessible parts of the borough and spaces/routes between buildings should be designed to be fully accessible. In addition, policy encourages facilities to be accessible via public transport and secure car parking should be provided for disabled people.

Economy

6.90 Policy E1 (Economic Development) seeks to secure a successful and inclusive economy in Camden by creating conditions for economic growth and harnessing the benefits for local residents and businesses. This policy seeks to support businesses of all sizes, in particular start-up and small and medium enterprises ('SMEs') This policy supports the development of Camden's health and education sectors and promotes the development of the Knowledge Quarter. New office development is directed to the growth areas, Central London and the town centres.

Retail

6.91 Policy TC1 (Quantity and location of retail development) seeks to focus new shopping and related uses in Camden's growth areas and existing centres, having regard to the level of capacity in these locations. This retail floorspace is expected to be supported by a range of other town centre uses, including food, drink and entertainment uses.

Housing

6.92 Policy H2 (Maximising the Supply of Self-contained Housing from Mixed-use Schemes) promotes the inclusion of self-contained homes as part of mixed-use schemes in all parts of the Borough. Where housing is required as part of a mix of uses, LBC will require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.

6.93 Paragraph 3.48 sets out examples of proposals that would not be required to provide housing, this includes if *"the development is publicly funded or serves a public purposes (such as providing transport infrastructure, land required for transport, land required for transport, or a dedicated facility for an educational, medical or research institution), and the nature of funding or facility prevents the inclusion of housing."*

Design

- 6.94 Policy C5 (Safety and Security) aims to make Camden a safer place. Developments will be required to demonstrate that they have incorporated design principles which contribute to community safety and security.
- 6.95 Policy C6 (Access for All) promotes fair access and seeks to remove the barriers that prevent everyone from accessing facilities and opportunities.
- 6.96 Policy D1 (Design) seeks to secure high quality design in development. *“The Council will require that development:*
- a. respects local context and character;*
 - b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;*
 - c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
 - d. is of sustainable and durable construction and adaptable to different activities and land uses;*
 - e. comprises details and materials that are of high quality and complement the local character;*
 - f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
 - g. is inclusive and accessible for all;*
 - h. promotes health;*
 - i. is secure and designed to minimise crime and antisocial behaviour;*
 - j. responds to natural features and preserves gardens and other open space;*
 - k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
 - l. incorporates outdoor amenity space;*
 - m. preserves strategic and local views;*
 - n. for housing, provides a high standard of accommodation; and*
 - o. carefully integrates building services equipment.”*
- 6.97 Policy D1 goes on to state that all of Camden is considered sensitive to development of tall buildings. When assessing developments for tall buildings particular attention will be given to how the building relates to its surroundings. The Council will only permit development for artworks, statues or memorials where they

protect and enhance the local character and historic environment and contribute to a harmonious and balanced landscape design.

Heritage

- 6.98 Policy D2 (Heritage) seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains and historic parks and gardens. The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Amenity

- 6.99 Policy A1 (Managing the Impact of Development) seeks to protect the quality of life of occupiers and neighbours. LBC will grant permission for development unless it causes unacceptable harm to amenity. Mitigation measures will be required where necessary to ensure the amenity of communities, occupiers and neighbours are protected. The Council will consider the following factors:

- a. *“Visual privacy, outlook;*
- b. *Sunlight, daylight and overshadowing;*
- c. *Artificial lighting lights;*
- d. *Transport impacts;*
- e. *Impacts of the construction phase;*
- f. *Noise and vibration levels;*
- g. *Odour, fumes and dust;*
- h. *Microclimate;*
- i. *Contaminated land; and*
- j. *Impact upon water and wastewater infrastructure.”*

- 6.100 Policy A4 (Noise and Vibration) seeks to ensure that noise and vibration is controlled and managed. Camden will not grant planning permission for development likely to generate unacceptable noise and vibration impacts, unless appropriate attenuation measures can be provided. Camden will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity. Policy A4 also seeks to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.

- 6.101 Policy A5 (Basements) indicates that the Council will only permit basement development where it can be demonstrated that the proposal would not cause harm to:

- a. Neighbouring properties;
- b. The structural, ground and water conditions of the area;

- c. The character and amenity of the area;
- d. The architectural character of the building; and
- e. The significance of heritage assets.

The Council will require applicants to demonstrate that proposals for basements:

- a. do not harm neighbouring properties, including requiring the provision of a Basement Impact Assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight';
- b. avoid adversely affecting drainage and run-off or causing other damage to the water environment;
- c. avoid cumulative impacts;
- d. do not harm the amenity of neighbours;
- e. provide satisfactory landscaping, including adequate soil depth;
- f. do not harm the appearance or setting of the property or the established character of the surrounding area;
- g. protect important archaeological remains; and
- h. do not prejudice the ability of the garden to support trees where they are part of the character of the area.

In determining proposals for basements, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and where appropriate, a Basement Construction Plan.

Environment, Energy and Sustainability

6.102 Policy A2 (Open Space) seeks new and enhanced open space to ensure that development does not put unacceptable pressure on the Borough's network of open spaces. The Council will:

- a. Seek developer contributions for open space enhancements using Section 106 agreements and the Community Infrastructure Levy ('CIL').
- b. Apply a standard of 0.74sqm for commercial and higher education developments while taking into account any funding for open spaces through the CIL.
- c. give priority to securing new public open space on-site, with provision off-site near to the development only considered acceptable where provision on-site is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision.
- d. seek opportunities to enhance links between open spaces recognising the multiple benefits this may bring.

6.103 Policy A3 (Biodiversity) seeks to protect and enhance sites of nature conservation and biodiversity. In addition, Policy A3 also seeks to protect and to secure additional trees and vegetation. In particular, the Council will resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value. Trees which are to be retained must be satisfactorily protected during demolition and construction phases of the development. It is expected that replacement trees or vegetation will be provided where the loss of significant trees or vegetation has been justified in the context of the proposed development, developments should also incorporate additional trees and vegetation wherever possible.

6.104 Policy CC1 (Climate Change Mitigation) requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Camden will:

- a. promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;
- b. require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;
- c. ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;
- d. support and encourage sensitive energy efficiency improvements to existing buildings;
- e. require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and
- f. expect all developments to optimise resource efficiency.

With regards to decentralised energy networks, all major developments are required to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network. To ensure that the Council can monitor the effectiveness of renewable and low carbon technologies, major developments will be required to install appropriate monitoring equipment.

6.105 Policy CC2 (Adapting to Climate Change) requires development to be resilient to climate change. All development should adopt appropriate climate change adaption measures, including:

- a. The protection of existing green spaces and promoting new appropriate green infrastructure;
- b. Not increasing, and wherever possible reducing, surface water run-off through increasing permeable surfaces and use of Sustainable Drainage Systems;
- c. Incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate, and
- d. Measures to reduce the impact of overheating, including application of the cooling hierarchy.

Developments of 500sqm or more of additional floorspace will be required to demonstrate the above in a Sustainability Statement and will be expected to achieve “excellent” in BREEAM assessments. The Council will encourage zero carbon in new development from 2019.

- 6.106 Policy CC3 (Water and Flooding) seeks to ensure that development does not increase flood risk and reduces the risk of flooding, where possible. Development will be required to incorporate water efficiency measures, avoid hard to the water environment, utilise Sustainable Urban Drainage ('SuDS') in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible and not locate vulnerable development in flood-prone areas. Assessments of flood risk should consider surface water and groundwater flooding, where applicable.
- 6.107 Under Policy CC4 (Air Quality) Air Quality Assessments ('AQAs') are required where development will expose residents to high levels of air pollution. Where the AQA shows that a development would cause harm to air quality or where development would introduce a sensitive receptor in locations of poor air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact. Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan.
- 6.108 Policy CC5 (Waste) aims to reduce the amount of waste produced and increase recycling and the reuse of materials. Developments will be required to include facilities for the storage and collection of waste and recycling.

Transport

- 6.109 Policy T1 (Prioritising Walking, Cycling and Public Transport) promotes sustainable transport by prioritising walking, cycling and public transport in the borough. In order to promote walking the Council will seek to ensure that developments provide high quality public realm improvement works, are easy and safe to walk through, are adequately lit and contribute towards bridges and water crossing, where appropriate. In addition, features should be included to assist vulnerable road users. In order to promote cycling the Council will seek to ensure that developments provide high quality, convenient and safe cycle routes, as well as providing secure cycle parking facilities. In order to promote the provision of public transport the Council will seek to ensure that development contributes towards improvements to the bus network or other forms of public transport, where appropriate.
- 6.110 Policy T2 (Parking and Car-free Development) seeks to limit the availability of parking and require all new developments in the borough to be car-free. On-site parking will be limited to spaces designated for disabled people and/or operational or servicing needs. The Council will not issue on-street or on-site parking permits in connection with new developments and will use legal agreements to ensure future occupants are not entitled to on-street parking permits.
- 6.111 Policy T3 (Transport Infrastructure) seeks to protect existing and proposed transport infrastructure, particularly routes for walking, cycling and public transport.
- 6.112 Policy T4 (Sustainable Movement of Goods and Materials) promotes the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road. The Council will encourage the movement of goods and materials by canal, rail and bicycle, where possible. Developments over 2,500sqm likely to generate significant movements by road will be expected to minimise the impact of freight movement by road by prioritising use of the TfL Road Network, accommodate goods vehicles on site

and provide Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments.

Implementation and Planning Obligations

- 6.113 Policy DM1 (Delivery and Monitoring) sets out that the Council will work with relevant providers to ensure that necessary infrastructure is secured to support Camden's growth and provide the facilities needed for the borough's communities. The Council will use planning contributions where appropriate to support sustainable development, secure infrastructure, facilities and services to meet the needs generated by development and to mitigate the impact of development. The Council will seek to secure appropriate scheme implementation and control phasing where necessary.

Camden Site Allocations Local Development Document

- 6.114 The site is allocated (Site 6) within Camden's Site Allocations Plan which identifies the site as suitable for mixed use development comprising health and medical related uses and/or residential development and other complementary uses.
- 6.115 The site is allocated for *“mixed use comprising health and medical related uses and/or permanent (C3) housing and affordable housing and other complementary uses. Development will be expected to:*
- *Ensure adequate re-provision or relocation of health and medical facilities*
 - *Retain and/or re-provide any existing residential and affordable residential floorspace*
 - *Optimise the potential of the site to provide new housing (including affordable housing)*
 - *Provide a more permeable site for pedestrians and cyclists and help establish better routes between Kings Cross and Camden Town*
 - *Respect the relationship and setting of St Pancras Gardens, and exploit its value through use and surveillance by enhancing access and creation of pedestrian links*
 - *Fully appreciate and respond to the heritage value of existing buildings, spaces and the adjacent gardens and their contribution to the character of the conservation area and seek to retain and restore buildings making a positive contribution*
 - *Create street frontages that contribute to activity and to street character and aid surveillance*
 - *Provide infrastructure for supporting local energy generation on site and/or connections to existing or future networks where feasible.”*

Other Material Considerations

Emerging - The London Plan (Intend to Publish version) December 2019

- 6.116 The Intend to Publish London Plan is a material consideration in the determination of applications. The weight attributed to this document is a matter for the decision-maker. The closer the document is to adoption, the greater the weight that should be given to it.

6.117 The following draft policies are considered to be pertinent to this application.

Community Facilities

6.118 Policy S1 (Developing London's Social Infrastructure) supports development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies. Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities. New facilities should be easily accessible by public transport, cycling and walking. Development proposals that would result in the loss of social infrastructure in an area of defined need should only be permitted where there are realistic proposals for re-provision that continue to serve the needs or the loss is part of a wider public service transformation plan which requires investment in modern, fit-for-purpose infrastructure and facilities to meet future population needs or to sustain and improve services. Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, unless this loss is part of a wider public service transformation plan.

6.119 Policy S2 (Health and Social Care Facilities) requires LPAs to work with Clinical Commissioning Groups ('CCGs') and other NHS and community organisations to; identify and address local health and social care needs within Development Plans, understand the impact of service transformation plans, undertaken needs assessments to inform Development Plans, identify sites in Development Plans for future provision and identify opportunities to make better use of existing and proposed infrastructure. Development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported. New facilities should be easily accessible by public transport, cycling and walking.

6.120 Policy S3 (Education and Childcare Facilities) seeks to ensure there is a sufficient supply of good quality education facilities to meet demand and offer educational choice.

Retail

6.121 Policy E9 (Retail, Markets and Hot-Food Takeaways) supports a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners.

Design

6.122 Policy D1 (London's Form and Characteristics) requires LPA's to undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth.

6.123 Policy D2 (Infrastructure Requirements for Sustainable Densities) sets out that the density of development proposals should be linked to the provision of future planned levels of infrastructure rather than existing levels and should be proportionate to the site's connectivity and accessibility by walking, cycling and public transport to jobs and services.

6.124 Policy D3 (Optimising Site Capacity) requires all development to make the best use of land by following a design led approach that optimises the capacity of a site. This requires consideration of a site's context and capacity for growth.

- 6.125 Policy D4 (Delivering Good Design) notes that development proposals referable to the Mayor must have undergone at least one design review early on in their preparation in advance of a planning application submission or demonstrate they have undergone a local borough process of design scrutiny.
- 6.126 Policy D5 (Inclusive Design) states that development proposal should achieve the highest standards of accessible and inclusive design. Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement.
- 6.127 Policy D8 (Public Realm) sets out that development proposals should explore opportunities to create new public realm, where appropriate. Public realm should be well-designed, safe, accessible, inclusive, attractive, well-connected, related to local and historic context and be easy to understand, service and maintain.
- 6.128 Policy D9 (Tall Buildings) requires development proposals to address the visual, functional, environmental and cumulative impacts of tall buildings.
- 6.129 Policy D11 (Safety, Security and Resilience to Emergency) states that *“Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.”*
- 6.130 Policy D12 (Fire Safety) states that all major development proposals should be submitted with a Fire Statement, produced by a third-party qualified assessor.
- 6.131 Policy D13 (Agent of Change) sets out the Agent of Change principle, it places the responsibility for mitigating impacts from existing noise and other nuisance generating activities or uses on the proposed new noise-sensitive development.
- 6.132 Policy D14 (Noise) seeks to reduce, manage and mitigate noise to improve health and quality of life.

Heritage

- 6.133 Policy HC1 (Heritage Conservation and Growth) sets out that development proposals affecting heritage assets and their settings, should conserve their significance. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities. Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.

Environment, Energy and Sustainability

- 6.134 Policy G1 (Green Infrastructure) sets out that development proposals should incorporate appropriate elements of green infrastructure that integrated into London’s wider green infrastructure network.
- 6.135 Policy G4 (Open Space) indicates that development proposals should not result in the loss of protected open space and where possible, should create areas of publicly accessible open space.

- 6.136 Policy G5 (Urban Greening) supports the inclusion of measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage in major development proposals.
- 6.137 Policy G6 (Biodiversity and Access to Nature) sets out that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.
- 6.138 Policy G7 (Trees and Woodlands) seeks to ensure that development proposals, where possible, retain existing trees of value. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed (e.g. CAVAT or another appropriate valuation system). The planting of additional trees should generally be included in new developments, particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.
- 6.139 In order to tackle issues of poor air quality, protect health and meet legal obligations, Policy SI1 (Improving Air Quality) sets out that development proposals should not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits or create unacceptable risk of high levels of exposure to poor air quality. Development proposals must be at least Air Quality Neutral and should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures. Major development proposals must be submitted with an Air Quality Assessment. Development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.
- 6.140 Policy SI2 (Minimising Greenhouse Gas Emissions) states that all major developments should be net zero-carbon and all major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. Policy SI2 also requires a minimum on-site reduction of at least 35% beyond Building Regulations for major development, non-residential development should achieve 15% through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either: 1) through a cash in lieu contribution to the borough's carbon offset fund, or 2) off-site provided that an alternative proposal is identified, and delivery is certain. Policy SI2 also states that development proposals referable to the Mayor should calculate the whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.
- 6.141 Policy SI3 (Energy Infrastructure) sets out that energy masterplans should be development for large-scale development locations which establish the most effective energy supply options. Major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system in
- 6.142 Policy SI4 (Managing Heat Risk) requires major development proposals to demonstrate how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy. Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.

- 6.143 Policy SI5 (Water Infrastructure) seeks to minimise the use of mains water, water supplies and resources. Non-residential development proposals should seek to achieve at least the BREEAM excellent standard for the 'Wat 01' water category¹⁶⁴ or equivalent and should incorporate measures such as smart metering, water saving and recycling measures to help to achieve lower water consumption rates and to maximise future-proofing.
- 6.144 Policy SI7 (Reducing Waste and Supporting the Circular Economy) promotes a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible. Policy SI7 encourages waste minimisation and waste prevention through the reuse of materials and use of fewer materials. Applications should be supported by a Circular Economy Statement.
- 6.145 Policy SI12 (Flood Risk Management) requires development proposals to ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.
- 6.146 Policy SI13 (Sustainable Drainage) states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible, in line with the drainage hierarchy. Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation. Development proposals for impermeable surfacing should normally be resisted unless they can be shown to be unavoidable.

Transport

- 6.147 Policy T1 (Strategic Approach to Transport) indicates that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport and active transport modes and ensure that any impacts on London's transport network are mitigated.
- 6.148 Policy T2 (Healthy Streets) requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance, reduce the dominance of vehicles on London's streets whether stationary or moving and be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.
- 6.149 Policy T3 (Transport Capacity, Connectivity and Safeguarding) states that development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments.
- 6.150 Policy T4 (Assessing and Mitigating Transport Impacts) requires transport assessments to be submitted with development proposals to ensure that impacts on the capacity of the transport network, at the local, network-wide and strategic level, are fully assessed. Transport assessment should embed the Health Street Approach within new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Serving Plans will be required having regard to TfL guidance. Where appropriate, mitigation through direct provision of facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified. Policy T4 also requires the cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, to be taken into account and mitigated.

6.151 Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with guidance contained in the London Cycling Design Standards.

| Land Use | Long-Stay | Short-Stay |
|--------------------------------------|--|---|
| A1 – Non-Food Retail (above 100 sqm) | first 1000 sqm: 1 space per 250 Thereafter: 1 space per 1000sqm (GEA) | first 1000 sqm:1 space per 60 sqm sqm, thereafter: 1 space per 500 sqm (GEA) |
| A2-A5 (above 100 sqm) | From a threshold of 100 sqm, 1 space per 175 sqm (GEA) | From a threshold of 100 sqm, 1 space per 20 sqm (GEA) |
| B1 – Research and Development | 1 space per 250 sqm (GEA) | 1 space per 1,000 sqm (GEA) |
| C2 – Hospitals | 1 space per 5 FTE staff | 1 space per 30 FTE staff |
| D1 – Other | 1 space per 8 FTE staff | 1 space per 100 sqm (GEA) |

Table 10.2: Minimum Cycle Parking Standards

6.152 Policy T6 (Car Parking) states that car-free development should form the starting point for all proposals in places that are well-connected by public transport. Car-free development has no general parking but should still provide disabled persons parking. Where car parking is provided, provision should be made for infrastructure for electric vehicles. Adequate provision should be made for efficient deliveries and servicing and emergency access. A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design.

6.153 Policy T6.5 (Non-residential Disabled Persons Parking) requires all non-residential developments to provide access to at least one on or off-street disabled persons parking bay. These should be located on firm and level ground, as close to the building entrance or facility they are associated with. Designated disabled persons parking bays and enlarged bays should be designed in accordance with the design guidance provided in BS8300: Vol 1.

6.154 Policy T7 (Deliveries, Servicing and Construction) requires development proposals to facilitate safe, clean and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way, which reflects the scale and complexities of developments.

6.155 Policy T9 (Funding Transport Infrastructure through Planning) sets out that the Mayor will charge the Mayoral Community Infrastructure Levy (MCIL) to secure funding towards transport infrastructure of strategic importance such as Crossrail 2, and potentially other strategic transport infrastructure. Planning obligations (Section 106 agreements), including financial contributions, will be sought to mitigate impacts from development, which may be cumulative. Such obligations and contributions may include the provision of new and improved public transport services, capacity and infrastructure, the expansion of the London-wide cycle networks and supporting infrastructure, and making streets pleasant environments for walking and socialising, in line with the Healthy Streets Approach.

Implementation and Planning Obligations

6.156 Policy DF1 (Delivery of the Plan and Planning Obligations) requires development proposals to provide the infrastructure and meet the other relevant policy requirements necessary to ensure that they are

sustainable and to support delivery of the Plan. When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this: 1) recognise the role large sites can play in delivering necessary health and education infrastructure; and 2) recognise the importance of affordable workspace, and culture and leisure facilities in delivering good growth.

Emerging – Camden Draft Site Allocations Local Plan

- 6.157 Following the adoption of the Local Plan in 2017, LBC are now reviewing the Camden Sites Allocation Plan (2013). This document will set out the Council’s approach to future development on key sites across the borough. Once adopted this Plan will replace policies in the 2013 Site Allocations Plan and be used alongside other policies in Camden’s Development Plan to assess new development proposals on key sites and areas. Consultation on the draft Site Allocations Local Plan took place on Thursday 13 February and ended on Friday 27 March 2020. LBC are currently preparing a statement setting out information about the consultation, the number of comments, what they said and what LBC are doing to address them.
- 6.158 Draft Policy KQ1 (Supporting growth in the Knowledge Quarter Innovation District) seeks *“to ensure the sustainable growth and success of the Knowledge Quarter Innovation District, major development proposals for additional employment, research and/or learning floorspace within it must:*
- a. Demonstrate that they have been developed in a collaborative way with other key stakeholders in the wider innovation district and potentially beyond to meet the needs of the knowledge sector*
 - b. Be supported by evidence that the type of floorspace being provided appropriately reflects current and emerging needs of the knowledge economy and would complement and support other institutions and companies that contribute directly to the success of the innovation district*
 - c. Seek to prioritise the creation of suitable floorspace for priority growth sectors within the district such as life sciences, digital collections and machine learning*
 - d. Provide for a suitable mix of workspace types including business accelerators, start-up and move on spaces*
 - e. Ensure that buildings are designed to support future reconfiguration for different activities and where possible include flexible floorplates, plant room and mechanical and electrical systems that allow a change from offices to laboratories*
 - f. Ensure that at least 20% of additional employment floorspace is affordable workspace*
 - g. Ensure development and its occupiers contribute to reducing inequalities and increasing life chances in neighbouring communities and the borough generally through maximising social value at the planning, construction and end user phases, including supporting increased access to jobs, skills training and education opportunities. Social value frameworks should be used to secure commitments to ensure that nobody gets left behind*

- h. Contribute towards the provision of new physical and social infrastructure to support the Knowledge Quarter Innovation District, such as new homes, public realm enhancements and transportation improvements including transforming pedestrian and cyclist movement within, around and across the Euston Road corridor*

Development proposals for specific sites within the Knowledge Quarter Innovation District must also accord with any relevant individual site allocation.”

6.159 Draft Policy CSP1 (Camley Street and St Pancras Way Area) indicates that this area has the potential to strengthen as an employment location and deliver a significant increase in the number, mix and affordability of homes in the area. *“To enable the area to fully realise its potential and become a more distinctive, vibrant and mixed urban neighbourhood, development within the area must:*

- a. Demonstrate how they have been prepared in an integrated way to optimise the use of land and coordinate development proposals through engagement with adjacent landowners and key stakeholders including local residents and businesses*
- b. Take account of and respond to the underlying historic railway industry and canal side character of the area*
- c. Contribute towards the development of new and improved pedestrian and cycle links within the growth area and across to Camden Town, Somers Town, King’s Cross and Euston, including the creation of a new canal crossing and supporting the development of the Camden High Line*
- d. Maximise on-site opportunities for urban greening and coordinate the delivery of an area-wide network of public green routes and spaces*
- e. Ensure that at least 50 percent of additional floorspace on each individual site is provided as permanent self-contained housing. In circumstances where on-site delivery is not appropriate and/or practical, the Council will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu*
- f. Minimise the impacts of operational vehicles, parking and servicing on existing streets by coordinating and incorporating shared access points and off-street servicing arrangements with compatible neighbouring uses. Identified development sites within the Camley Street and St Pancras Area must, in addition to fulfilling the criteria in this policy, also meet the criteria set out in any relevant site-specific policies.”*

6.160 Draft Policy CSP5 (St Pancras Hospital) allocates the application site for *“a mixed-use development consisting of health, housing and commercial uses, especially those that support the development of the knowledge quarter innovation district. Development proposals must be in accordance with Policy CSP1 and in addition must:*

- a. Demonstrate that they have been prepared in a coordinated and integrated way with involvement from relevant landowners and other key stakeholders. Proposals for individual development parcels must not compromise or prejudice the aspirations for the wider site and growth area and/or the delivery of adjacent development parcels*

- b. *Retain and reuse key buildings of significant heritage or townscape value*
- c. *Explore opportunities to create a more active and engaging street edge along Granary Street and onto St Pancras Way*
- d. *Create new east-west public routes including connecting St Pancras Way through to Granary Street, 101 Camley Street and the canal*
- e. *Create north-south routes including connecting St Pancras Gardens with the adjacent development site to the north of Granary Street*
- f. *Use redevelopment to open up opportunities to integrate landscaping proposals between the north-east corner of the site and public realm spaces created at 101 Camley Street and “Ugly Brown Building” to optimise the quality of open space provision and help facilitate a potential new canal crossing*
- g. *Reinforce the role of the Granary Street/Camley Street junction as a key gateway location*
- h. *Improve the visual relationship to and access from northern Somers Town.”*

Supplementary Planning Documents

6.161 The following SPGs and SPDs have been identified as being of particular relevance to the proposals:

GLA

- Social Infrastructure SPG (Adopted May 2015);
- Accessible London: Achieving an Inclusive Environment SPG (Adopted October 2014);
- Character and Context SPG (Adopted June 2014);
- Sustainable Design and Construction SPG (Adopted April 2014);
- Planning for Equality and Diversity in London (Adopted October 2007); and
- The Mayor’s Transport Strategy (Adopted March 2018).

LBC

- Kings Cross / St Pancras Conservation Area Statement (adopted December 2003)
- Camden Planning Guidance (‘CPG’) Access for All (March 2019);
- CPG Air Quality (March 2019);
- CPG Amenity (March 2018);
- CPG Artworks Statues and Memorials (March 2019);
- CPG Basements (March 2018);
- CPG Biodiversity (March 2018);

- CPG Community Uses, Leisure Facilities and Pubs (March 2018);
- CPG Design (March 2019);
- CPG Developer Contributions (March 2019);
- CPG Employment Sites and Business Premises (March 2018);
- CPG Energy Efficiency and Adaptation (March 2018);
- CPG Planning for Health and Wellbeing (March 2018);
- CPG Public Open Space (March 2018);
- CPG Town Centres and Retail (March 2018);
- CPG Transport (March 2019);
- CPG Trees (March 2019); and
- CPG Water and Flooding (March 2019).

Emerging Supplementary Planning Documents

6.162 The following emerging SPGs and SPDs have been identified as being of particular relevance to the proposals. A draft SPD is capable of being a material planning consideration, but the weight that can be attached to it would be more limited than that of a formally adopted SPD.

GLA

- Public London Charter – Pre-consultation draft (March 2020);
- Circular Economy Statement Guidance – Pre-consultation draft (April 2020);
- Whole Life-Cycle Carbon Assessment – Pre-consultation draft (April 2020);
- ‘Be Seen’ Energy Monitoring Guidance – Pre-consultation draft (April 2020);
- Energy Planning Guidance (updated April 2020); and
- Fire Safety Guidance – Pre-consultation draft (July 2020).

LBC

6.163 The Council recently ran a consultation ending on 9th October 2020 on more limited updates to the CPG documents listed below, focusing on amendments to reflect wider planning changes, or to provide clarifications or updates:

- Air Quality;
- Amenity;

- Basements;
- Community uses, leisure and pubs;
- Design;
- Employment sites and business premises;
- Energy efficiency and adaptation;
- Planning for health and wellbeing;
- Town centres and retail; and
- Transport.

Draft Canalside to Camley Street SPD (July 2020)

- 6.164 The Camley Street and St. Pancras Way area is experiencing a number of changes, with several development proposals likely to come forward in the near future. LBC have therefore been preparing a draft planning guidance document that outlines some of the key issues and opportunities for the area. It builds upon the existing policies and priorities in the adopted Local Plan. The draft guidance sets out some key planning objectives and design principles to help shape, influence and guide future development proposals in the area. This is to ensure that they are acceptable and can deliver positive benefits and improvements to make the area even better for the local community.
- 6.165 The Council recently ran a consultation on the draft SPD ending on 25th September 2020. Responses to the consultation will be considered by LBC and incorporated into a final version of the draft Canalside to Camley Street document, which the Council is currently anticipating adopting as a Supplementary Planning Document in early 2021.
- 6.166 The draft SPD acknowledges that the St Pancras Hospital site benefits from a site allocation, *“which supports more effective use of the site for improved and new health facilities and for housing within any land or buildings that become surplus. Following NHS consultations on the proposed relocation and reorganisation of facilities and services, future plans include Moorfields Eye Hospital and University College London (UCL) Institute of Ophthalmology relocating from City Road in Islington to new facilities on the north-west part of the site. These are proposed to be developed alongside new C&I facilities, other health services including a UCL mental health research institute and other uses, including housing, and C&I selected a development partner (King’s Cross Central Limited Partnership) in December 2019.”*
- 6.167 It is acknowledged that *“Redevelopment will offer major opportunities for investment in new health and research related facilities and in the restoration and making better use of important heritage assets. New pedestrian routes and public spaces should be created to make the site more inviting, outward looking and connected with the area. Developed in a comprehensive and co-ordinated way, proposals should also take account of, and link with, the Ted Baker proposals to the north and 101 Camley Street and the canal to the east.”*

7. The Case for Planning Permission

7.1 This section assesses the key planning considerations relating to the proposals, taking into account planning policies as well as material considerations.

7.2 The following matters are key to the application and considered in turn below:

- **Land Use** (Principle of Large-scale Development, Loss of Existing Social Infrastructure and Principle of Proposed Uses);
- **Design Considerations** (Scale, Height and Massing, Building Design, Building Layout, Materials, Public Realm and Secured by Design);
- **Impact on Heritage Assets** (Impact on Listed Buildings and Conservation Areas, Impact on Views and Archaeology);
- **Impact on Amenity** (Daylight, Sunlight and Overshadowing, External Lighting, Noise and Wind Microclimate);
- **Environment, Energy and Sustainability** (Air Quality, Contamination, Ecology, Trees and Biodiversity, Energy and Sustainability, Fire Safety and Flood Risk and Sustainable Urban Drainage Systems); and
- **Highways and Access Considerations** (Traffic Movements, Local Improvements, Car Parking and Cycle Parking, Delivery and Servicing and Waste and Recycling).

Land Use

Principle of Large-scale Development

7.3 The intensification of the site is supported by paragraphs 117 and 118 of the NPPF and by Policy G1 of the LBC Local Plan, which promote the effective use of land and buildings by supporting best use of previously-developed or 'brownfield' land. Policy G1 also seeks the provision of a mix of uses where appropriate, particularly in the most accessible parts of the Borough. Policy G1 notes that development will take place across the borough with the most significant growth within the designated Growth Areas. Whilst it is acknowledged that the application site is not located within the King's Cross Growth Area, it is in very close proximity. Moreover, in accordance with Policy E1, the mix of uses proposed would further continue the development of the 'Knowledge Quarter', helping to increase its reach and influence as a centre of international importance for the research and development of the knowledge industries such as the life sciences.

7.4 Overall, when considering the principle of the development with the objectives of the NPPF and Policy G1, it is evident that this is an appropriate development. The site is brownfield land in a highly accessible location and would provide a mixture of uses.

Loss of Existing Social Infrastructure

- 7.5 London Plan Policies 3.16 and 3.17, Intend to Publish London Policies S1 and S2 and Policy C2 of the Camden Local Plan set out that development proposals that would result in a loss of social infrastructure should only be permitted where there are realistic proposals for re-provision or the loss is part of a wider public service transformation plan which requires investment in modern, fit-for-purpose infrastructure to meet need and improve services.
- 7.6 The relocation of Moorfields at City Road and UCL IoO is facilitated by the relocation of the existing C&I services on the SPH site. The redevelopment of the site has been identified in the NHS's North Central London Sustainability and Transformation Plan as the proposed location of new health and research facilities. Indeed, the C&I Trust are in the process of disposing of the site to raise funds to move inpatient facilities to a new, purpose-built facility next to the existing Highgate Mental health Centre and the Whittington Hospital in Archway and develop integrated community health centres at Lowther Road, Greenland Road, St Pancras and in North West Camden. It is also anticipated that some healthcare and office facilities for the C&I Trust will be included within the redevelopment of the remaining SPH site by the C&I Trust's development partner, KCCLP.
- 7.7 In accordance with policy, a service transformation strategy is in place and will ensure that there is no loss of provision or access to services as a result of the relocation. All services will be relocated in advance of the closure and demolition of the existing buildings to ensure there is no interim loss of the services provided by the C&I Trust. Moreover, the redevelopment of the City Road site would only commence following the completion of the proposed development, ensuring no break in service provision by Moorfields.

Principle of Proposed Uses

- 7.8 The proposed uses remain true to both the historical use of the site as the former St Pancras Workhouse and its current institutional use as a hospital (Use Class D1). The new building will comprise eyecare, research and educational uses and is supported by planning policy at all levels. Policy C2 of the Camden Local Plan states that the Council will support the investment plans of educational, health, scientific and research bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK. Para 5.23 of Local Plan makes reference to Camden's 'Knowledge Quarter' and science growth sector. Paragraph 2.53 states that the Council will *"support the concentration of medical, educational, cultural and research institutions within Central London that form an integral part of the Knowledge Quarter"*.
- 7.9 London Plan Policies 3.16 and 3.17 and Intend to Publish London Policies S1 and S2 also support the provision of new high-quality social infrastructure and opportunities that make better use of existing and proposed infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.
- 7.10 The proposals seek to relocate the existing Moorfields at City Road and the UCL IoO from Bath Street. The existing facilities are no longer fit for purpose, do not meet modern standards, do not maximise opportunities for collaboration and do not meet patient expectations. This is due to the constraints of the historic buildings, fragmentation, highly inefficient layout, lack of interlinking, and the lack of space for growth.

- 7.11 Moorfields and IoO provide healthcare and research capability of strategic importance both to London and nationally. As such, the provision of the purpose-built facility to support these specialist functions is strongly supported in strategic planning terms.
- 7.12 The site is allocated within both the adopted and emerging Camden Site Allocations Document, wherein it is regarded as having potential for redevelopment. Within LBC's adopted Site Allocation Plan, the site is identified as Site 6: 4 St Pancras Way (St Pancras Hospital). The document notes that the site is currently underutilised in land use terms and that it is suitable for a mixed-use development comprising health and medical related uses and/or permanent (C3) housing and affordable housing and other complementary uses. Within the LBC draft Site Allocations Local Plan Document, Policy CSP5 allocates the site for health, self-contained homes and employment (knowledge quarter uses). In accordance with the adopted and emerging site allocations, the proposed development would include a mix of uses including medical, research and education as well as other ancillary uses such as retail/café.
- 7.13 Policy H2 of the Camden Local Plan promotes the inclusion of residential homes as part of a mix of uses within larger-scale non-residential development proposals. The proposed development does not provide any residential floorspace. Given the proposal will only cover part of the wider SPH site, it is envisaged that any residential floorspace will be provided on the remainder of the SPH site as part of the proposal being brought forward by KCCLP. Moreover, it is considered that Policy H2 does not apply to the proposed development because it meets the exceptions set out in paragraph 3.48 of the Camden Local Plan. In accordance with paragraph 3.48 the development proposal is publicly funded and serves a public purpose through its provision of a dedicated facility for an educational, medical and research institution. The nature of the funding and facility prevents the inclusion of housing within the development.

Overall, the proposed land use on site are considered to be in accordance with the requirements set out in the NPPF, London Plan Policies 2.1, 2.9, 3.16, 3.17, 3.18, 4.1, 4.7 and 4.8, draft New London Plan Policies S1, S2, S3 and E9, LBC Local Plan Policies G1, C2, H2, E1 and TC1 and LBC Site Allocation 6.

Design Considerations

- 7.14 As set out in the accompanying Design and Access Statement, the proposals have been developed with a clear understanding of the site's constraints and opportunities. The design is mindful of the relationship with the neighbouring buildings and surrounding townscape and will be of exceptional design (being designed by the award-winning architects Penoyre & Prasad).
- 7.15 The proposals seek to replace the existing 6 low rise and poor-quality buildings on the site with a single building occupying the majority of the site's area. The proposals align with the guidance set out in the site allocation and the emerging Canalside to Camley Street SPD, maintaining the opportunity for greater pedestrian permeability through the wider SPH site, opportunities to enhance access to the canal and creating active frontages on St Pancras Way and Granary Street.

Scale, Height and Massing

- 7.16 During the pre-application process the height, scale and massing of the proposal has been refined in response to comments from LBC Officers and the Design Panel Review process. The proposal seeks to mediate between the varied character and scale of the surrounding buildings, the existing lower Victorian

buildings to the south and the consented higher buildings to the north (103 Camley Street, 102 Camley Street, 101 Camley Street, the Ugly Brown Building and the Travis Perkins/Unite student building).

- 7.17 The proposed building will rise from seven storeys (lower ground, ground, plus 5 storeys) at the southwestern corner of the site to 10 storeys (lower ground, ground, plus 8 storeys and enclosed rooftop plant) at the north-eastern corner. In order to mitigate the impact of the building from street level, the building is set back at sixth floor level along the southern and eastern elevations. In addition, the rooftop plant is setback from the parapet and is surrounded by a continuous louvred screen to minimise the appearance of the plant from street level and surrounding properties.
- 7.18 Overall, the proposed building heights and massing are considered appropriate for this inner London location surrounded by a varied townscape.

Building Design

- 7.19 As set out in the Design and Access Statement, the building has been articulated to have a clearly defined base, middle and top which all respond in varying ways to the scale of the neighbouring buildings in order to produce a building that contributes positively to the local environment. The base of the building provides public facing activities allowing for transparent and active frontages. The middle of the building comprises a combination of ceramic panels and glazing. At fourth floor level, a visual break is provided, and the ceramic panels are replaced with aluminium louvres serving the interstitial plant floor. At the upper levels of building the façade treatment varies again, the ceramic panels are replaced with glass shadow boxes and a ribbed aluminium spandrel. The effect of this change is to create a horizontality which contrasts with the more vertical patterning below. At roof level, a continuous band of aluminium louvres hides the mechanical plant, this is then topped with a steel frame that supports photovoltaic panels.
- 7.20 As an alternative to setting back the massing, the rhythm and direction of the cladding on the façade on the corner of Granary Street and St Pancras Way is horizontal in orientation. This results in a change to the reflection and light qualities, thus mitigating the mass of the building at this point. In addition, the horizontal cornice line wrapping around the building at the fifth-floor parapet level creates the sense of the upper level slightly set back from below.
- 7.21 The overall approach results in a building that has a human scale and contributes positively to local character and distinctiveness, and is appropriate to its local context.

Building Layout

- 7.22 People arriving can enter the building from one of two entrances – the lower ground entrance to the southwest and the upper entrance located to the northeast. Both entrances lead to the reception area in the atrium, also known as ‘the Oriel’. The Oriel sits at the heart of the building and provides an extension of the public realm and main vertical circulation space.

The layout of the new building has been developed to enhance collaboration and interaction between staff, students, patients and the public. The lower ground and upper ground floor provide the public facing services of the building, including the café/retail spaces, A&E, main reception, patient services, temporary exhibition space, lecture theatre and classrooms. Clinical spaces are located a ground, first and second floor levels. The third floor level comprises surgical facilities and the fourth floor accommodates the associated

surgical plant and tech hub. The fifth floor provides private patient clinical facilities. Medical research is accommodated on both the fifth and sixth floor levels. The sixth-floor levels also include the remaining education facilities and staff restaurant, both of which provide access for staff and students onto the terrace. The seventh floor comprises management and office space for the administration of Oriel as well as additional research space. Finally, the eighth floor comprises a range of specialist medical research facilities.

Materials

- 7.23 The material palette has been informed by an analysis of the surrounding context. Only high-quality materials and finishes, appropriate to this context and the quality of the proposal will be used. This approach is in accordance with London Plan Policies 7.6 (Architecture), 7.7 (Location and Design of Tall and Large Buildings) and 7.8 (Heritage Assets and Archaeology) and LBC Local Plan Policy D1 (Design).

Public Realm

- 7.24 In accordance with London Plan Policies 7.5 (Public Realm), 7.6 (Architecture) and 7.7 (Location and Design of Tall and Large Buildings), draft New London Plan Policy D8 (Public Realm) and LBC Local Plan Policy T1 (Prioritising Walking, Cycling and Public Transport), a comprehensive landscape and public realm strategy has been prepared for the site. The details of which are set out in the Landscaping Design Report prepared by White Arkitekter.
- 7.25 The proposal will open up new publicly accessible spaces within the site and create new public connections across it. It has been designed to respond to the layout of the development, the topography of the site and the characteristics of the site and the local context.
- 7.26 The hard landscaping is of high quality and suitable for the site and its proposed users. The proposed layout of beds and benches and the interaction between them is varied and informal in nature, adding character to the open spaces. Soft landscaping is proposed in the form of planters located around the site together with new tree planting.

Secured by Design

- 7.27 In accordance with London Plan Policies 7.3 (Designing Out Crime) and 7.13 (Safety, Security and Resilience to Emergency), draft New London Plan Policy D11 (Safety, Security and Resilience) and LBC Local Plan Policy D1 (Design), 'Secured by Design' has been considered to minimise crime. Improved active ground floor frontages will provide better natural surveillance and thus assist in reducing opportunities for committing crime.

In light of all of the above, it is considered that the design is in accordance with Section 12 of the NPPF, London Plan Policies 7.1, 7.2, 7.3, 7.4, 7.5, 7.6 and 7.7, draft New London Plan Policies D1, D2, D3, D4, D5, D8, D9 and D11 and LBC Local Plan Policies C5, C6 and D1.

- 7.28 Further detail is set out in the Design and Access Statement and Landscaping Design Report.

Impact on Heritage Assets

7.29 Please refer to the HTVIA by KM Heritage submitted in support of this planning application for a detailed assessment of the proposed scheme in the context of surrounding buildings and heritage assets, which justifies that the form and scale of the proposed development is acceptable and in accordance with planning policy.

Archaeology

7.30 Planning policy seeks to protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate. In accordance with London Plan Policy 7.8 (Heritage Assets and Archaeology), draft New London Plan Policy HC1 (Heritage Conservation and Growth) and LBC Policy D2 (Heritage), an Archaeological Desk Based Assessment has been prepared by AECOM in support of the planning application.

7.31 The site falls just outside of an Archaeological Priority Area ('APA'), however there are two in close proximity that may impact upon the significance of the site:

- APA 2.10 (Tier 2) – Regent Canal and Rail Infrastructure (DLO38607); and
- APA 2.2 (Tier 2) – St Pancras Old Church and Burial Ground (DLO38611).

7.32 A study area comprising the site and 350m from the boundary has been assessed in order to gain an understanding of the cultural heritage. There are no designated heritage assets located within the site, however there is one Registered Park and Garden and 32 non-designated heritage assets located within the 350m study area.

7.33 One non-designated asset, the St Pancras Workhouse lies within the site, whilst the site is adjacent to the post-medieval burial ground of St Giles approximately 50m to the south of the site.

7.34 The assessment identifies a high potential for Post-Medieval remains, moderate to high potential for Early Medieval and Medieval remains and low potential for Palaeolithic and Mesolithic, Neolithic, Bronze Age, Iron Age, Roman, and Modern remains. Evidence of Early Medieval and Medieval period remains would likely consist of occupation, settlement, and human remains. The evidence from the post-medieval period would likely consist of the remains and structures from the Camden Workhouse within the site, with potential for inhumations related to this structure. These remains would be of local significance to the Borough and regional significance to London and would help to answer questions from the Research Framework for London. The significance may be lessened through poor survival, however, the groundworks during the construction phase of the project will impact upon the archaeological remains of the St Pancras Workhouse. Due to the current Covid-19 pandemic, historical sources could not be consulted to determine whether any burials may be present on the Site, therefore a worst-case scenario has been assumed and appropriate mitigation measures proposed based on the potential to encounter burials relating to the Workhouse and infirmary.

7.35 As part of the pre-application consultation process, GLAAS has recommended an archaeological evaluation be completed pre-determination of planning consent, but that due to the site being situated within a

working hospital during the Covid-19 pandemic, they would allow the evaluation mitigation strategy to be undertaken following approval of planning consent. It is anticipated that this will be secured by condition. The scope of any evaluation and excavation would be discussed with the local authority archaeology officer and set out in a written scheme of investigation which would be approved in writing by the local authority. The results of the evaluation would inform the scope of any mitigation measures that may be required.

Subject to planning conditions, it is considered that the proposal is in accordance with the requirements set out in the NPPF, London Plan Policy 7.8, draft New London Plan Policy HC1 and LBC Policy D2.

7.36 Further detail is set out in the Archaeological Desk Based Assessment and THVIA.

Impact on Amenity

Daylight, Sunlight and Overshadowing

7.37 A Daylight, Sunlight and Overshadowing Assessment has been prepared by AECOM in support of the application. In accordance with the BRE guidelines 'Site Layout Planning for Daylight and Sunlight – A guide to Good Practice', this report assesses the daylight and sunlight effects of the proposed scheme against the existing site conditions. The report also assesses the daylight and sunlight effects of the proposed scheme against the consented scheme at the Ugly Brown Site (2-6 St Pancras Way, London NW1 0TB) which is located immediately to the north of the application site (ref. 2017/5497/P). A summary is provided below; however, the report should be referred to in full.

7.38 In terms of daylight performance, there will be some changes to daylight access as a result of the proposed development, however effects will be localised to the immediate area surrounding the property. Properties facing west along St Pancras Way (Nos. 7-11) will have their daylight access reduced below the recommended guidelines. The Ugly Brown Building (existing) will also experience reductions in daylight below good practice guidance levels, however this is not expected to be a significant effect as data centres are not considered to be particularly sensitive to a change in daylight. Whilst the windows on the remaining buildings within the SPH site will also experience reductions, the majority will be in line with good practice guidance levels. Moreover, in the longer term it is anticipated that the remainder of the SPH site will be brought forward for redevelopment.

7.39 The Ugly Brown Building consented schemes results in similar daylight conditions as the proposed development conditions and nearly all properties assessed are expected to retain similar daylight levels. However, there is likely to greater reduction in direct daylight access for the Mary Rankin Building with the consented scheme in place as this creates a new large obstruction to the north. Daylight access to the consented buildings is good, with all windows receiving recommended levels of daylight in the baseline condition.

7.40 With regards to sunlight, annual probable performance levels are largely retained with the proposed development in place as under existing conditions. South facing windows of the Ugly Brown Building which directly face the proposed development will have their direct sunlight access reduced to below the good practice 25% benchmark target, and to below 5% during winter months. However, effects to the Ugly Brown Building are not considered to be significant as a data centre is not considered to be sensitive to a change in sunlight conditions. The Mary Rankin Building may also see some sunlight reductions to windows facing

the proposed development. This is only expected to affect around six windows, which is considered acceptable in the urban context of the site.

- 7.41 In terms of overshadowing performance, St Pancras Gardens will not be affected by the proposed development due to its location to the south of the Proposed Development and will not be overshadowed by it. Sunlight available to the small amenity space adjacent to Regent's Canal is good under both existing and proposed conditions, in line with good practice recommendations by retaining above 80% existing sunlight. The roof terrace of the Proposed Development receives good light throughout the day for nearly its full area, indicating that it will exceed good practice recommendations of at least 2 hours for over 50% of the exterior space on 21 March. Therefore, it is considered that outdoor amenity areas will receive good sunlight throughout the year.
- 7.42 Overall, the proposed scheme responds well to the surrounding properties. Where there are deviations from the BRE guidance, these are moderate in nature and acceptable when considered in the immediate urban context.

As such, the proposal accords with the BRE guidelines, the NPPF, London Plan 7.6, draft New London Plan Policy D6 and D8 and LBC Local Plan Policy A1.

- 7.43 Further detail is set out in the Daylight, Sunlight and Overshadowing Assessment.

External Lighting

- 7.44 An External Lighting Assessment has been prepared by AECOM and submitted in support of the planning application.
- 7.45 The site is surrounded by a mix of property types including residential, commercial, retail and healthcare which could have a sensitivity to a change in the night-time condition. There are also natural elements near the site such as St Pancras Gardens to the south and the Regents Canal to the northeast which may also be affected by night-time lighting.
- 7.46 New lighting is proposed for exterior areas including the public realm at lower ground and ground floor levels and the external roof terraces on the sixth floor in order to provide for safe access and use of the site. The potential for light spill, sky glow and glare created by new lighting associated with the proposal will be controlled through the selection and placement of lighting equipment. In addition, the proposed lighting will operate control strategies such as using part-night dimming or shut off during a post-curfew timeframe (2300 to 0700) where not needed for safety or security purposes.
- 7.47 It is expected that the majority of receptors will experience a noticeable visual change with the new structure and new lighting in place, however measurable effects are largely contained within the site or wider SPH site. The proposal incorporates lighting mitigation measures, including; the provision of light without overlighting, careful consideration of angling and use of narrow beam / controlled optics to focus all light onto road surfaces, task areas landscaping or canopy features to limit the potential for stray light to spill.

Overall, the assessment demonstrates compliance with the requirements of the NPPF, draft New London Plan Policy D8 and LBC Local Plan Policy A1.

7.48 Further detail is set out in the External Lighting Assessment.

Noise

7.49 A Noise and Vibration Impact Assessment has been prepared by AECOM and submitted in support of the planning application.

7.50 Measurements of the baseline noise environment have been undertaken at the site. Due to the constraints of the ongoing COVID-19 pandemic, there is uncertainty about whether the noise data obtained during the noise surveys could be considered to be representative of normal conditions given changes in travel patterns. Consequently, historical noise survey data from surrounding planning permissions has been used to validate the data.

7.51 The results of the measurements have been used to predict noise and vibration generated by construction activities and noise emissions during demolition and substructure works. In accordance with London Plan Policy 7.15 (Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes), draft London Plan Policies D13 (Agent of Change) and D14 (Noise) and LBC Policies A1 (Managing the Impact of Development) and A4 (Noise and Vibration), mitigation measures are set out in the report to reduce noise emissions and minimise the impact of the proposal on local amenity. Compliance with the Noise and Vibration Impact Assessment will be secured by condition.

7.52 Changes to road traffic noise due to both construction and operational traffic associated with the development have been identified as negligible and not significant.

7.53 Building services plant will be required to achieve noise levels set to 10 dB below the measured background noise level with temporary limits during emergencies set at 10dB above the measured background noise level. Building services plant will be designed to achieve the specified noise limits at nearby sensitive receptors. At this early stage, the plant proposals are preliminary, and a detailed plant noise assessment has not been undertaken and this will be covered by standard condition.

The assessments demonstrate that the impact of the development in terms of noise will comply with the relevant provisions the NPPF, the London Plan Policy 3.2, 5.3, 7.6 and 7.15, draft New London Plan Policy D13 and D14 and LBC Local Plan Policy A1 and A4.

7.54 Further detail is set out in the Noise and Vibration Impact Assessment.

Wind Microclimate

7.55 A Wind Microclimate Assessment has been undertaken by BRE and submitted in support of the application. Following identification of all external spaces relevant to pedestrian wind comfort, a total of 149 locations were established for consideration in this study.

7.56 The analysis followed the Lawson Comfort Criteria ('LCC') assessment which relates to establishing the probability of exceedance of assigned wind thresholds for each location considered. Measurement locations in close proximity to the proposed development were considered to be more sensitive to wind due to the nature of the development and intended user groups. These locations were assessment against more stringent LCC to reflect the presence of more vulnerable people.

- 7.57 The wind microclimate around the ground level of the Proposed Development is expected to be suitable for the intended usage of the development. The wind conditions at the 6th floor roof terrace are suitable for any pedestrian activity throughout the year, apart from one location. This location is a fire exit and would be infrequent in use, therefore the wind conditions at the 6th floor roof terrace will be suitable for the intended usage throughout the year.
- 7.58 This approach is in accordance with London Plan Policy 7.7, draft New London Plan Policy D9 and LBC Local Plan Policies D1 and A1.
- 7.59 Further detail is set out in the Wind Microclimate Assessment.

Environment, Energy and Sustainability

Air Quality

- 7.60 An Air Quality Assessment ('AQA') has been undertaken by AECOM and submitted in support of the application. The whole of the LBC was declared an AQMA in 2002. The site is not located within an Air Quality Focus Area (AQFA). The nearest AQFAs are Kilburn Town (500m) and Swiss Cottage (600m) northwest of the site boundary.
- 7.61 The assessment has focused on pollutants of primary concern within the LBC administrative area, namely NO₂, PM₁₀ and PM_{2.5}. The report presents the findings of the assessment of the likely effects of the proposed development as a result of both the construction phase and occupation phase.
- 7.62 LBC Policy CC4 (Air Quality) states that development that involves significant demolition, construction or earthworks will be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan. Accordingly, this assessment has been undertaken and it is concluded that during, the construction phase, there is a high risk of dust soiling during demolition, earthworks and construction and there is a medium risk during track out. The dust risk of the above activities in terms of human health is considered low. Based on the level of risk of dust related activities, the AQA outlines several mitigation measures which should be incorporated and delivered through implementation of a Construction Management Plan (an Outline Construction Management Plan prepared by AECOM has been submitted in support of the application), that will be secured via condition and agreed with LBC prior to works commencing on site. The residual impact generated on local air quality by construction activities following the application of the recommended mitigation measures outlined is not significant.
- 7.63 The impact of the operational development on local air quality has been assessed at sensitive receptor locations. Concentrations of NO₂ are generally predicted to be below the mean annual air quality objective at receptors both with and without the proposed development. Except for Goldington Building Flats 1-3, Goldington Crescent Gardens and Margaret Toker Flats whereby the change in annual mean NO₂ concentrations is predicted to be negligible (0.2 µg/m³). Similarly, the annual mean PM_{2.5} and PM₁₀ concentrations are predicted to be below the relevant objectives at all modelled receptors both with and without the proposed development. The impact of the proposed development at all existing sensitive receptors locations is therefore considered to be negligible. As there are no air quality exceedances on site and no adverse impacts caused to off-site sensitive receptors, there are no mitigation measures required for the operation phase or any limitations on air intake locations for ventilation systems on the

development site. In addition, the operational traffic impacts from the proposed development on local air quality are considered to be not significant.

- 7.64 The Air Quality Neutral Assessment calculated the total net trips associated with the proposed development per annum to be much less than the transport benchmark trips for the proposed development. Therefore, the Proposed Development can be considered neutral for transport-related emissions.
- 7.65 The proposed development does not include any on-site centralised combustion plant however, it does include two oil-fired generators for emergency use, which will be tested for 20 minutes each month. As such it is considered highly unlikely that the emissions per year will even approach the calculated building emissions benchmark, and the proposed development is concluded to be air quality neutral with regard to building emissions.

Overall, the air quality impacts of the proposed development are considered not to be significant and as such the proposal conforms with the NPPF, London Plan Policies 5.7, 6.13 and 7.14, draft New London Plan Policies SI1 and D3 and LBC Local Plan Policies CC4, A1 and T2.

- 7.66 Further detail is set out in the Air Quality Assessment.

Contamination

- 7.67 A Phase 1 Geotechnical and Geoenvironmental Desk Study Report has been prepared by AECOM in support of the planning application. The report investigates the history of the site with respect to possible contaminative uses, ground conditions and hydrogeology.
- 7.68 The geology of the site is likely to comprise Made Ground (where present) overlying the London Clay Formation, overlying the Lambeth Group and the Thanet Formation, with the White Chalk Subgroup at depth.
- 7.69 Historical Ordnance Survey maps of the area reveal that the site was formerly St Pancras Workhouse, before it became St Pancras Hospital in 1953. Historical use of the Site as St Pancras Workhouse and 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 off-site 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; solvents; ash and fill; organic and inorganic chemicals; and sulphate. Ground gases and/or other mobile contaminants may be present also. The overall geo-environmental risk is considered to be low and moderate/low.
- 7.70 It is recommended that a Phase 2 intrusive ground investigation be undertaken in order to substantiate the preliminary findings of the Phase 1 Report. This will be secured through an appropriately worded planning condition. In addition, a site-specific radon risk assessment is also recommended to determine whether radon protective measures are required.

Therefore, subject to the recommendations above being adhered to, the development proposal is in accordance with the NPPF, London Plan Policy 5.21 and LBC Policy A1.

7.71 Further detail is set out in the Phase 1 Geotechnical and Geoenvironmental Desk Study Report.

Ecology, Trees and Biodiversity

- 7.72 A Preliminary Ecology Appraisal ('PEA') has been undertaken by AECOM and submitted in support of the application. This survey updates an Extended Phase 1 Habitat Survey undertaken on 24th April 2019 and appended to the request for an EIA Screening Opinion for the proposed development issued to the LBC on 19th December 2019. The second site visit was undertaken on 13th August 2020. The purpose of the PEA is to identify whether there are known or potential biodiversity receptors that may constrain or influence the design and implementation of the proposed development.
- 7.73 St Pancras Gardens (SINC) is located 45m to the south of the site, St. Pancras Lock (Sites of Metropolitan Importance for Nature Conservation) is located 100m to the northeast and Camley Street Local Natural Park is located 200m south east of the site. It is recommended that a Construction Management Plan is produced and implemented during the construction of the Proposed Development to ensure no adverse construction related impacts to St Pancras Gardens SINC. With appropriate measures in place, it is considered unlikely that there would be any disturbance or impacts on St. Pancras Gardens SINC.
- 7.74 The existing habitats on-site are predominately comprised of hardstanding and buildings (92%), with small areas of introduced shrub, amenity grassland and trees. Overall, the site is considered to be of low ecological value due to the limited green habitat within the site.
- 7.75 The buildings on site have been assessed for their suitability to support roosting bats, the Camley Centre has moderate potential, the Bloomsbury, Ash House and Jules Thorn buildings have low potential and the Post Room and Former Mortuary, and Kitchen Building have negligible potential. As a result, dusk emergence and dawn emergence surveys were recommended for the buildings deemed to have moderate and low potential for bats. These surveys were completed in July and September 2019 and a Bat Survey Report outlined the methodology and results has been prepared by AECOM and submitted in support of this application. The report concludes that no bat emergences or returns to roost were recorded on site and very limited bat activity was recorded during the surveys. It is therefore concluded that roosting bats are likely to be absent and no further survey work is recommended, and a Natural England European Protected Species Mitigation Licence will not be required for works associated with the proposed redevelopment of the site.
- 7.76 Suitable habitat for birds was present within the site in the form of trees and introduced shrubs. It is recommended to schedule vegetation clearance outside of the core nesting season for birds.
- 7.77 Virginia creeper, an invasive non-native species was recorded during the visit to the site. The Virginia creeper was providing limited habitat for insects and other invertebrates as well as a food source and roosting for birds. Although listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) (WCA), the hazard posed by the plant was very low, e.g. risk of damage to built structures. Nevertheless, causing the plant to spread into the wild would contravene the WCA and it is recommended that an Invasive Species Management Plan is produced to recommend measures to minimise the risk of spread of the Virginia creeper and to deal with three other invasive non-native plants identified on site which are listed in the London Invasive Species Initiative list of species of concern.

- 7.78 Though not listed on Schedule 9, three other invasive non-native plant species were found within the site: false acacia, cherry laurel and buddleia. These three species are listed in the London Invasive Species Initiative as species of concern due to the high risk of negative impact on the environment.
- 7.79 Opportunities for enhancement have been proposed within this document to obtain net gains for biodiversity in order to comply with London Plan Policy 7.19 (Biodiversity), draft New London Plan Policy G6 (Biodiversity), LBC Local Plan Policy A3 (Biodiversity). The recommended enhancements include: creation of a roof garden with a mixture of vegetation, creation of a brown roof with pollen rich species, living walls with climbing plants, planting street trees or installation of planters at ground level, use of native species and the addition of insect hotels, log piles, bat and bird boxes. In order to deliver these enhancements, it is recommended that a Landscape and Ecology Management Plan is produced.
- 7.80 An Arboricultural Impact Assessment and Tree Survey Report have been prepared by AECOM in support of the planning application. The assessment has been undertaken in accordance with British Standard BS5837 and considers trees within or immediately adjacent to the site.
- 7.81 The tree survey identifies 30 tree features. The trees on the site are predominantly semi mature to mature and in fair to good condition; the trees contribute to the character of the site and local amenity. A number of young, recently planted trees (hornbeam and Lebanese wild apple) located on Granary Street to the north of the site were also included in the survey. Species present include false acacia, Monterey cypress, sycamore, cherry laurel, silver birch and flowering cherry. The most significant trees are the Monterey cypress (T28), the false acacia (T29) which have been assigned to Category B and the London Planes (T20 and T24) located outside of the site boundary to the south east which have been assigned to Category A.
- 7.82 The majority of the site is located within the Kings Cross St Pancras Conservation Area (excluding the land the north of Granary Street and trees T1, T8, T11 and T12 which are located within the Regents Canal Conservation Area). Therefore, all trees with a stem diameter greater than 75mm (measured at a height of 1.5m) within this area are subject to statutory protection, equivalent to that of a TPO. As such, T29 is protected by a TPO (ref. C402 2003).
- 7.83 Trees are highly valued features which provide a broad range of essential benefits, there are range of tree valuation methodologies available. The asset value of the individual trees included within the tree survey has been calculated in monetary terms using the CAVAT system. The surveyed trees have a total combined CAVAT value of £364,535.
- 7.84 It is proposed that 13 tree features will be removed to facilitate the proposed development; this includes 3 individual trees classed as moderate quality (Category B) including T29 which is subject to a TPO and 8 individual trees and 2 groups of trees classes as low quality (Category C). In addition, 2 trees of very low quality (Category U) are also recommended for removal. These trees are arguably not suitable for long term retention and their removal is justified regardless of the development proposals. The loss of the trees is necessary to achieve the demolition, construction and landscaping proposals for the site. The overall CAVAT value of the trees to be removed is £160,754.
- 7.85 A small number of the recently planted young trees along the southern footway of Granary Street are also likely to require removal (or could be transplanted), these trees are likely to be under the ownership of LBC.

Prior to any works the ownership of these trees must be established and the consent of the tree owner obtained in writing.

- 7.86 All of the remaining surveyed trees can be retained and protected, as they are located well clear of the proposed development area. An Arboricultural Method Statement is appended to the Arboricultural Impact Assessment, it sets out the specification for tree protection measures and identifies a methodology for sensitive works close to retained trees.
- 7.87 The necessary tree removals will be mitigated with a high-quality scheme of new tree planting and associated landscaping works, which represents an opportunity to enhance the quality, impact, diversity and resilience of the local tree stock. Replacement planting of 16 trees (of species which will be provided with appropriate soil volumes and aftercare to reach a significant ultimate size) will provide equivalent asset value benefits in 20 to 30 years and will nearly double this value after 40 years, continuing to increase in value over time. Additional smaller trees and shrubs are also proposed which will contribute to the wider amenity value provision of the proposed development.
- 7.88 A Biodiversity Net Gain Assessment has been prepared by AECOM and submitted in support of the application. The report makes a comparison between the biodiversity value of habitats present within the site prior to development and the biodiversity value of habitats present following the completion of the development. The results of the assessment are used to inform requirements for habitat mitigation to enable the scheme to achieve the minimum 10% biodiversity net gain target. The report is based on the proposed mitigation measures set out in the PEA, Bat Survey Report, Arboricultural Impact Assessment and Landscaping Design Report.
- 7.89 The baseline biodiversity value was 0.47 area-based units. The proposed development is predicted to have a biodiversity value of 0.58 area-based units. The on-site mitigation proposed therefore results in a gain of 0.11 (23.16%) biodiversity units, this represents 13.16% greater biodiversity units than the minimum value of 10% required by the forthcoming Environmental Bill, London Plan Policy 7.19 (Biodiversity), draft New London Plan Policy G6 (Biodiversity), LBC Local Plan Policy A3 (Biodiversity).
- 7.90 In accordance with draft New London Plan Policy G5, the Landscape Design Report confirms that the Urban Greening Factor (UGF) will be 0.18 for the building. This is lower than the 0.3 which is required for commercial buildings due to the constraints on the Site at ground level and the operational use of the building. The UGF calculation does not currently include six trees which are proposed on St Pancras Way. If these trees were to be included these would increase the UGF to 0.25.

Considering all of the above, the site is in accordance with the NPPF, London Plan Policies 5.10, 5.11, 7.19 and 7.21, draft New London Plan Policies G1, G4, G5, G6 and G7 and LBC Local Plan Policy A3.

- 7.91 For full details please refer to the PEA, Bat Survey Report, Arboricultural Impact Assessment and Tree Survey Report and Biodiversity Net Gain Assessment prepared by AECOM.

Energy and Sustainability

- 7.92 The need for the sustainable use of resources and addressing climate change is emphasised in Chapter 5 of the London Plan and draft New London Plan policies S12 (Minimising Greenhouse Gas Emissions), S13 (Energy Infrastructure) and S14 (Managing Heat Risk). The thrust of these policies is also reflected in the

adopted Camden Local Plan policies CC1 (Climate Change Mitigation), CC2 (Adapting to Climate Change) and CC3 (Water and Flooding). In accordance with these policies an Energy Strategy and Sustainability Statement have been prepared by AECOM in support of the planning application.

- 7.93 The proposed development demonstrates an estimated carbon dioxide saving of 27%. This is against a target emission reduction of 35% over Building Regulations Part L 2013 for new non-domestic buildings. The Energy Strategy sets out several energy efficiency measures that have been incorporated to achieve the 27% carbon dioxide saving. A summary is provided below, for further details please refer to the full report.
- Be Lean – A wide range of passive design measures have been incorporated within the building including; efficient building fabric with U-values optimised to reduce heating and cooling loads, solar control glazing to optimise daylighting and thermal gains whilst minimising cooling demand, service routes minimised to reduce heat loss and solid panels/shading in the building façade to manage solar gains.
 - Be Clean – The potential for connecting the development to an existing or planned heat network has been investigated. At present, connection to a network is not considered viable. This is a result of a number of factors including; difficulty connecting across the canal and railway lines, the existing pipe infrastructure being too small at the likely connection point and the heating being provided by CHP engines with no decarbonisation strategy in place. The proposed development will be designed to enable connection to a district heating network in future if one is developed.
 - Be Green – A detailed assessment of renewable energy opportunities has been undertaken and has determined that renewable energy will be provided in the form of PV panels on the roof (864 sqm), a ground source heat pump system to provide base load heating and cooling and an air source heat pump system to meet remaining heating, cooling and hot water demands.
- 7.94 It has been demonstrated that the minimum improvement over the Target Emission Rate outlined in National Building Regulations cannot be achieved on site. The shortfall in savings relative to a 35% saving target is expected to be addressed through offsetting. This results in an estimated payment to LBC of approximately £191,936.
- 7.95 A comprehensive monitoring and metering system will be installed to measure the actual energy and carbon performance. These operational demands will be reported to the Mayor for at least five years via an online portal.
- 7.96 Considering the steps taken to minimise carbon emissions and to incorporate low carbon or renewable technologies within the development including the infrastructure to connect to future local energy networks, and with the payment of the carbon offset payment, it is considered that the proposed development would comply with Policy 5.2 (Minimising carbon dioxide emissions) of the London Plan and Policy CC1 (Climate change mitigation) and Policy CC2 (Adapting to climate change) of the Camden Local Plan.
- 7.97 The BREEAM UK New Construction 2018 Pre-Assessment Report with the Sustainability Report demonstrates how the proposed development seeks to achieve BREEAM ‘Excellent’ in compliance with Policy CC2 (Adapting to Climate Change). It identifies a target BREEAM score of 77.46% and a BREEAM rating of ‘Excellent’. This provides a buffer over the target score of 7.46% needed to achieve an ‘Excellent’ rating.

7.98 A Circular Economy Statement has been prepared by AECOM in support of the application. This report sets out that the existing buildings on site have come to end of their life and would not be economical or practical to refurbish to meet the requirements of the proposed development. A Pre-Demolition Audit of the existing buildings will be undertaken which will identify opportunities to reclaim or recycle components and materials, wherever possible.

7.99 The report sets out the Circular Economy opportunities identified for the proposed development in accordance with the nine Circular Economy Principles. This includes rationalising the quantum of floorspace proposed, considering opportunities for off-site prefabrication to minimise material waste, utilising sustainable materials and the provision of flexible and adaptable floorplates and floor heights. At the detailed design stage, a 'Disassembly Manual' will be developed that provides guidance on prolonging the life of the building and reducing operational construction and demolition waste, as well as setting out an 'end-of-life' strategy.

As set out above, the proposals are in accordance with NPPF, London Plan Policies 5.1, 5.2, 5.3, 5.5, 5.6, 5.7, 5.8 and 5.9, draft New London Plan Policies SI2, SI3, SI4, SI5 and SI7 and LBC Local Plan Policies CC1 and CC2.

7.100 For full details please refer to Energy Strategy, Sustainability Statement and The Circular Economy Statement prepared by AECOM in support of the application.

Fire Safety

7.101 Draft Policy D12 (Fire safety) of the New London Plan requires a Fire Statement to be submitted alongside all major development proposals. A Fire Strategy has been prepared by AECOM and submitted in support of the application. The report covers the requirements in Policy D12 relating to construction, means of escape, safety features and access for fire personnel. The report confirms that in accordance with Policy D12, the proposals will meet the requirements of Building Regulations.

7.102 For full details please refer to the Fire Safety Statement.

Flood Risk and Sustainable Urban Drainage Systems (SuDS)

7.103 A Flood Risk Assessment and Drainage Strategy Report and a Sustainable Urban Drainage Report have been prepared by AECOM in support of the planning application. The site is situated within Flood Zone 1, sits within a Critical Drainage Area (ref. Group3_003) and borders the King's Cross Local Flood Risk Zone.

7.104 The proposed development flood risk classification is 'More Vulnerable'. More Vulnerable developments are appropriate in Flood Zone 1 and Flood Zone 2. An Exception Test is required for More Vulnerable developments in Flood Zone 3a areas and More Vulnerable developments are not appropriate for Flood Zone 3b areas. The site is situated within Flood Zone 1; therefore, the Sequential Test and Exception Test are both passed.

7.105 Whilst the site itself does not form part of the Kings Cross Local Flood Risk Zone, its proximity to the zone suggests that it may require additional consideration to address flooding issues that affect that zone. There is a potential source of pluvial flooding to the site from the urban catchment around the site. In particular, the surface water flooding shown in St Pancras Way to the west of the site is significant. However, St Pancras

Way falls south towards Pancras Road which lies at topographical levels lower than the lowest point on the site. The smaller instances of flooding within the Site are a result of the existing sub-standard drainage infrastructure which does not include any attenuation systems to cater for larger storm events. However, the surface water flooding is shown to be restricted to some limited parts of the site where the topographical levels of the internal private roads result in low points that accumulate surface water runoff when the existing drainage infrastructure become overwhelmed. Overall, the risk of flooding from pluvial sources at the site is therefore considered to be medium.

- 7.106 In order to mitigate the risk from pluvial flooding, the proposed development will be constructed so that the finished floor level of the building will be set above the levels of the adjacent St Pancras Way. The proposed on-site levels outside of the proposed building footprint will be designed to fall away from the building, with linear drainage features located at the building entrances to provide additional flood protection. Where possible, pervious surfacing will be used to draw surface water to porous sub-base and to underground drainage systems to reduce the potential for failure of over-ground catchment systems (such as gullies) through blockages. The proposed mitigation measures allow this flood risk to be reduced to low.
- 7.107 The risk of flooding from groundwater, fluvial and sewer sources is low. There is no potential for flooding from tidal or artificial sources on the site.
- 7.108 The development will be constructed with separate foul and surface water drainage networks which will only combine at the edge of the site boundary in order to connect to the downstream private combined drains and eventually into the public sewers on St Pancras Way.
- 7.109 The foul water drainage will discharge via gravity into existing combined water drains within the site This will ultimately discharge into public sewers within St Pancras Way.
- 7.110 Surface water from the site will be discharged into the existing combined sewers within the wider SPH site, which in turn discharge into the Thames Water public sewer within St Pancras Way.
- 7.111 The proposal will result in an increase in impermeable area from 0.716 ha to 0.792 ha. The additional area will result in an increase in runoff rates unless steps are taken to amend the drainage regime to suit. The existing drainage network is unsuitable to meet the new standards required for surface water disposal for the site. Therefore, the Proposed Development will include a dedicated surface water drainage network that will integrate a system of SuDS features. The proposed SuDS system will be designed to ensure that the peak discharge rates from all storms up to an including the 100-year event plus 40% climate change will not exceed the proposed discharge rates set within this Flood Risk and Drainage Strategy. This will ensure that flood risk from the Proposed Development to the surrounding areas is kept low.
- 7.112 The proposed runoff from the site will be limited to a value as close to the greenfield runoff rate as reasonably practicable. Due to the nature of the site, with very limited area outside the footprint of the proposed building and foundations and existing highways, there is a limited space available to accommodate attenuation storage while maintaining a gravity outfall. Due to the space available and limited potential depth, a reduction of 85% from the existing site runoff levels is proposed as the lowest reasonable discharge rate from the Proposed Development. This is achieved through on-site storage and flow restrictions. Additional volume is also included in the form of permeable surfacing, where possible. The

surfacing will be underlain by a porous sub-base construction of suitable thickness to accommodate the required volume of storage for the specific drained area.

Considering the above, the proposal is in accordance with the NPPF, London Plan Policy 5.11, 5.12 and 5.13, draft New London Plan Policy SI12 and SI13 and LBC Local Plan Policy CC2 and CC3. For full details please refer to the Flood Risk Assessment and Drainage Strategy and the Sustainable Urban Drainage Report.

- 7.113 For full details please refer to the Flood Risk Assessment and Drainage Strategy Report and a Sustainable Urban Drainage Report.

Transport, Waste and Recycling

- 7.114 A Transport Assessment (including Stage 1 Road Safety Audit), Framework Travel Plan, Delivery and Servicing Plan, Operational Recycling and Waste Management Strategy, Outline Construction Management Plan and Outline Construction Logistics Plan have been prepared by AECOM in support of the planning application, in accordance with the requirements of the Paragraph 111 of the NPPF, London Plan Policy 6.3 and LBC Local Plan Policy T4.
- 7.115 The documents demonstrate that the scheme complies with the relevant standards and policies (the NPPF, London Plan Policies 6.3, 6.5, 6.9, 6.10 and 6.13, draft New London Plan Policies T1, T2, T3, T4, T5 and LBC Local Plan Policies T1, T2, T3, T4, A1, A4 and CC4) and results in a sustainable development in transport terms. A summary is provided below, for further details please refer to the full reports.

Traffic Movements

- 7.116 A comprehensive multi-modal trip generation assessment has been undertaken for the proposal.
- 7.117 The site is located within an area of overall PTAL of 6b, which represents the highest level of public transport accessibility possible. The site has excellent accessibility to bus stops, underground stations and cycle hire facilities. This high level of accessibility is crucial for the nature of the development. The proposal would create a world-leading research institute which is likely to attract patients, visitors and staff from across the UK and internationally.
- 7.118 The majority of staff, students and visitors will use sustainable modes of transport due to the lack of car parking spaces and the proximity to cycle, bus and rail/tube facilities. However, given the mobility and health requirements of some patients, visitors, staff and students, it is necessary to provide vehicular access to the site for those less mobile.
- 7.119 The proposal is forecast to increase traffic on St Pancras Way by between 2.9-3.2% in 2026 when the proposed building is anticipated to be operational. On the section of Granary Street between the junction with St Pancras Way and the proposed servicing bay for the proposed development there will be an increase in traffic of 4.8%, and to the east of the servicing bay the increase will be 2.2%. The additional traffic is related to patients arriving by car and utilising the combined NEPT and car/taxi drop-off and pick-up facility proposed on St Pancras Way. The drop-off/pick-up will be managed by staff from Moorfields to escort patients into the building. It is considered that this level of change would not have a material impact on the operation of the local highway network.

- 7.120 An increase of 64 cycle trips is forecast in the AM peak, and 45 in the PM peak. The proposed drop-off facility on St Pancras Way has been designed to accommodate a cycle lane on St Pancras Way in the future, and this would complete the link between the Proposed Development and the existing cycle network.
- 7.121 An increase of approximately two bus passengers per local bus service is expected in the AM and PM peak hour. Therefore, based on the forecast increase of one to two persons per bus service it is not considered the proposal would have a material impact on the local bus services.
- 7.122 With regards to rail trips, it is forecast there would four inbound trips per service in the AM peak and one inbound trip and four outbound trips per service forecast for the PM peak hour. Therefore, considering the low number of forecast trips per service within the AM and PM peak hours and considering the rail trips are existing on the rail network it is not considered the proposed development would have a material impact on the local rail network.
- 7.123 It is forecast that there would be no net increase in the number of trips made by London Underground, and that the impact of the proposal would be limited to re-distribution of existing trips on the Northern Line to the Hammersmith & City, Circle, Piccadilly, Metropolitan and Victoria Lines. The main impact would be additional trips on the Northern Line between City Road and St Pancras in the AM peak, with a reduction in the opposite direction, and the reverse in the PM peak, with an increase between St Pancras and City Road and a reduction between City Road and St Pancras.
- 7.124 Overall, no significant impacts are expected on the local transport network, given the excellent quality of the existing underground, rail, cycling and pedestrian infrastructure readily accessible to the site. From this it is clear that the development would not result in a severe residual impact on the local transport network in accordance with the NPPF. Moreover, the Framework Travel Plan seeks a range of measures to further encourage the use of sustainable and active modes of travel associated with the proposal. An initial target has been set out seeking to increase active travel by 5% within five years of the baseline surveys being undertaken following initial occupation of the development. The Travel Plan also sets out the intended approach for monitoring and reviewing the effectiveness of the Travel Plan at one, three and five years after occupation.

Local Improvements

- 7.125 The proposed development would make contributions through a s106 agreement towards Highways Improvement Works. This includes a raised table incorporating a new signal-controlled pedestrian crossing to replace the existing zebra crossing on St Pancras Way is proposed at the junction with Granary Street. A raised table in this location will reduce vehicle speeds on the approach to the junction and the proposed drop-off/pick-up bay. The existing zebra crossing would be replaced by a signal-controlled crossing incorporating the appropriate tactile paving. This would provide an audible signal to aid people with visual impairments, providing a much safer crossing than the existing Zebra crossing which has no audible signal.
- 7.126 Contributions would also be made towards resurfacing carriageways around the site. These improvements to transport infrastructure would be in compliance with Policy T3 (Transport infrastructure) of the Camden Local Plan.
- 7.127 Moreover, Buro Happold have been commissioned to prepare a separate study on the 'Last Half Mile'. This will identify and consider any additional mitigation measures, with the specific aim of improving links to

public transport hubs for people with visual and other impairments, to encourage the use of public transport over private car and taxi. The effectiveness of these measures will be monitored through the Travel Plan. This work will inform an Accessibility Plan for the site which will be developed in discussion and agreement with wider stakeholders.

Car Parking

- 7.128 It is proposed that the development will not include any general car parking provision, this is consistent with the existing Moorfields Hospital and UCL IoO buildings at City Road. However, 3 blue badge bays will be provided along the shared surface route to the south of the proposed building and accessed via St Pancras Way. The spaces will be reserved for staff only and will have to be booked prior to use. No blue badge parking will be provided for patients, although blue badge holders are permitted to park in pay & display spaces free of charge or on single yellow lines.
- 7.129 The site is accessible by all modes of transport and has the highest achievable PTAL of 6b, so is well located to enable people to access by non-car modes of travel. Therefore, the proposals accord with the NPPF and local policy in that opportunities for sustainable travel to and from the site will be maximised.

Cycle Parking

- 7.130 The site is well located for access to the local cycle networks and cycle docking stations. There is a cycle lane to the north of the site on St Pancras Way and it is understood that LBC intends to extend this to the junction with Pancras Road. The proposed drop-off facility on St Pancras Way has been designed to accommodate a cycle lane on St Pancras way in the future.
- 7.131 Both the short-stay and long-stay cycle parking for the development will exceed both the current London Plan Standards and the draft New London Plan Standards and the long-stay cycle parking will be only slightly below the 20% uplift required by LBC to support the expected future growth of cycling for those that live and work in Camden.
- 7.132 The proposal will provide a total of 390 long-stay cycle parking spaces and 112 short-stay cycle parking spaces. The long-stay cycle parking will be located in the south-east corner of the building with its own separate entrance. The short-stay cycle parking will be provided within the public realm.
- 7.133 The London Plan and LBC Local Plan identify that development proposals should support sustainable travel through the inclusion of appropriate cycle parking and facilities, high quality pedestrian environments and consideration of public transport accessibility levels. It is therefore considered that the proposed cycle and car parking strategy is in line with the London Plan Policies 6.9 (Cycling), 6.10 (walking) and 6.13 (Parking) and draft London Plan Policy T1 (Strategic Approach to Transport), T2 (Healthy Streets), T3 (Transport Capacity, Connectivity and Safeguarding), T5 (Cycling) and T6 (Car Parking).

Construction

- 7.134 In accordance with draft New London Plan Policy T7 (Deliveries, Servicing and Construction) and LBC Policies A1 (Managing the Impact of Development) and T4 (Sustainable Movement of Goods and Materials), an Outline Construction Management Plan and Outline Construction Logistics Plan have been prepared by AECOM and submitted in support of the application. A detailed Construction Management Plan and

Construction Logistics Plan will be secured via condition and agreed with LBC prior to works commencing on site.

- 7.135 Both documents will set out the measures to be taken to minimise the impact of demolition and construction on the local community and ensure a safe environment, within and around the site. In addition, the Construction Logistics Plan will identify construction vehicle routes in line with the London Lorry Control Scheme (LLCS), and measures to ensure these routes are adhered to. It is envisaged that all construction traffic will access the site via St Pancras Way.
- 7.136 It is anticipated that works will be undertaken from 8am-6pm on Monday to Friday, 8am to 1pm on Saturday, with no work on Sundays and Bank Holidays. These working hours will be secure by condition, working outside these hours will not be permitted without prior written consent from LBC.

Delivery and Servicing

- 7.137 In accordance with London Plan Policy 6.13 (Parking) and draft New London Plan Policy T7 (Deliveries, Servicing and Construction) a dedicated off-street servicing bay is proposed with access from Granary Street. The service area includes 4 bays with 2 suitable for LGVs and 2 suitable for HGVs. The service area has been designed so that all vehicles are able to enter and exit in a forward gear. 1 of the HGV bays has been designed to accommodate a waste compactor. This will enable the required vehicle to access the compactor and for a smaller/shorter vehicle to use this bay, when required. The waste compactor can be moved to one of the LGV bays temporarily if both HGV bays are required at the same time.
- 7.138 Gas deliveries (oxygen, liquid carbon dioxide and liquid nitrogen) will be made from within the delivery/loading area. The oxygen storage area is located immediately to the east of the loading bay with the delivery vehicles required to manoeuvre into position by driving forward into the area adjacent to the oxygen storage area, then reversing into the HGV bay to exit.
- 7.139 It is expected there will be one delivery of liquid oxygen, one delivery of liquid carbon dioxide and one delivery of liquid nitrogen per week. Each delivery is expected to last 20 – 40 minutes. For safety reasons no other vehicles will be allowed within the service area during gas deliveries. Gas deliveries will therefore be arranged outside normal working hours to minimise disruption to other servicing activity.
- 7.140 No servicing or deliveries will take place on street or within the drop-off/pick-up facility, with the exception of occasional oil deliveries for the emergency generators which will take place within the entrance to the servicing area. Oil deliveries will therefore be arranged outside normal working hours to minimise disruption to other servicing activity. One oil delivery is expected approximately every 6 months in order to ensure the oil levels are kept at the required levels for emergency back-up generator use.
- 7.141 During the oil delivery the footway adjacent to the proposed development will be temporarily closed as members of the public would not be permitted to pass the oil tanker while connected to the building for health and safety reasons. A marshal will be present to ensure no members of the public pass the oil tanker on the footway whilst the tanker is connected to the building. The closure of the footway will be agreed with LBC and appropriate signage will be placed where required to divert pedestrians onto the opposite side of Granary Street. The expected footway diversion for pedestrians would be via the crossing on Granary Street to the south-west adjacent to St Pancras Way and Granary Street to the south-east adjacent to Camley Street.

- 7.142 The required capacity of the servicing area has been based on surveys undertaken at the existing Moorfields City Road site and UCL IoO facilities on Bath Street to quantify the existing service vehicle volumes. The survey indicated that approximately 61 service vehicles were received between 0700 and 1900 on the day of the survey, this equates to five vehicles per hour. The peak number of deliveries equates to a requirement for a minimum of three servicing bays, based on average dwell times observed. Four servicing bays are proposed, this will allow a maintenance vehicle to be accommodated as well as providing some spare capacity to allow unscheduled deliveries to be accommodated and to provide some resilience.
- 7.143 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. With all deliveries arriving at a single point, it will be possible to manage delivery and servicing activities more efficiently and reduce average dwell times, providing further resilience in the capacity. Consolidation methods will be considered to reduce and minimise the number of vehicles such as use of the Freight Consolidation Centre in Edmonton. Where possible, deliveries and servicing will occur between 0800-2000 to manage the potential disruption and noise disturbance to nearby residents. However, given that the servicing area is within the proposed development and not on-street, any disruption and noise disturbance would be kept to a minimum.
- 7.144 In accordance with London Plan Policy 6.3 (Assessing Effects of Development on Transport Capacity), draft New London Plan Policies T7 (Deliveries, Servicing and Construction) and London Plan Policies A4 (Noise and Vibration) and T4 (Sustainable Movement of Goods and Materials) is anticipated that the Delivery and Servicing Plan will be secured via condition with review and monitoring of the plan taking place after the first, third and fifth year of operation. As per the Travel Plan, the Delivery and Servicing Plan will be a live document and will be updated with new measures and changes to the strategy as and when appropriate.

Waste and Recycling

- 7.145 Draft New London Plan Policy S17 (Reducing Waste and Supporting the Circular Economy) and LBC Policy CC5 (Waste) aim to reduce the quantum of waste generated by development proposals and require developments to include facilities for the storage and collection of waste and recycling. The waste strategy for the proposed development is set out with Operational Recycling and Waste Management Strategy which has been prepared by AECOM in support of the planning application.
- 7.146 The proposed development is anticipated to produce approximately 233,882 litres of recycling and waste material per week, equating to approximately 1,438 tonnes of recycling and waste material per year. The proposed development will have one main bin store for wheeled bins which will contain the following; 23 x 770 L healthcare bins, 12 x 1,100 L paper bins, 1 x 1,100 L metal can bin, 12 x 120 L food bins and 2x 240 L glass bins. There will also be an auxiliary waste store adjacent to the loading bay for additional wheeled bins (9 x 1,100 L plastic bins), a cardboard baler and 3 x cardboard bales. Separate bin stores are provided for the BSU waste (2 x 1,100 L bins) and chemical waste. A residual waste compactor will also be situated in the loading bay. The compactor and cardboard baler allow for efficiencies of space. The bin store design will enable the segregation of the following recycling streams: plastics, metal, cardboard, paper, glass, healthcare, hazardous waste, and food waste. With separate space provisions provided for Adhoc recycling streams such as batteries, textiles and bulky waste.
- 7.147 All waste stores and compactor volume have been designed to provide sufficient capacity to hold and manage the waste arisings for the proposed development, based on daily collections of plastics, metals,

paper and healthcare waste (based on two-day storage capacity), a twice weekly collection of glass and food waste (with an additional day's storage capacity), a once every four day collection of a residual waste compactor, and a weekly collection of cardboard bales and hazardous waste (with additional day's storage capacity).

- 7.148 Recycling and waste sacks will be collected by the cleaning team from centralised bin hubs throughout the building. As the waste journey from internal bin to bin store is likely to be over 30m in instance altogether, depending on the preference of the internal management team, it is the expectation that sacks will be placed into either a cleaning trolley or cage. The cleaning team will then use one of two goods lifts to take the waste to the main bin store. For any cardboard, and wheeled bin waste the cleaning operative will take the materials to the smaller Auxiliary bin store where the cardboard baler will be situated.
- 7.149 A collection schedule and timeslot will be agreed with the waste contractor. Ahead of the collection timeslot for each material, the bins will be moved by the internal management team to the designated temporary bin area. The bins will then be manoeuvred to the waste truck by the waste operatives and collected via either a waste vehicle or (in the case of a compactor) a smaller skip vehicle. The waste collections are likely to be required to take place early morning or late evening due to the amount of loading time required, with the potential for this to be outside the 0800-2000 identified in the LBC Local Plan. To minimise external sound, soundproofing shutters will be fitted.
- 7.150 Cardboard will be baled at the site and relevant waste compacted to maximise efficiencies of scale and reduce frequency of collections.

Summary

- 7.151 In respect of the proposed development, this Planning Statement demonstrates that:
- The proposed land uses are supporting in this location.
 - The building will comprise an exceptional design and will take account of the existing form, character and appearance, detailing and material palette of the local area.
 - It will have an acceptable impact on existing and future occupiers of surrounding properties in terms of privacy, daylight and sunlight and overshadowing.
 - It complies with the adopted car and cycle parking standards and will promote use of active modes of transport as far as possible.
 - The development will reduce carbon emissions as far as possible on-site and provide a payment in lieu to address the shortfall.
- 7.152 The proposed development complies with the provisions of the NPPF, specifically Paragraph 11 – *‘the presumption in favour of sustainable development’*. The proposal is also in accordance with the adopted development plan. Therefore, it is our view that planning permission should be granted for the proposed development.

8. Planning Gain

- 8.1 This section assesses the relevant policies for seeking planning obligations to mitigate for the potential impact of the development and the methods of calculation.
- 8.2 Section 106 of the Town and Country Planning Act 1990 ('S106') enables a Local Planning Authority ('LPA') to impose obligations on a developer to mitigate against the impact of development.
- 8.3 The NPPF advises that LPAs should consider the use of planning obligations where they could make an otherwise unacceptable development acceptable. Planning obligations should only be used where it is not possible to address unacceptable impacts through planning conditions. Paragraph 56 of the NPPF and S122(2) of The Community Infrastructure Levy Regulations 2010 (as amended) state that planning obligations should only be sought where they meet all of the following tests:
- They are necessary to make a development acceptable in planning terms; and
 - They are directly related to a development; and
 - They are fairly and reasonably related and kind to a development.
- 8.4 In addition to LBC Local Plan Policy DM1 (Delivery and Monitoring), LBC has a CPG entitled 'Developer Contributions' (adopted March 2019). This CPG provides detailed guidance on the use of Section 106 Planning Obligations.

Mayoral CIL

- 8.5 The Mayor of London introduced a Community Infrastructure Levy (MCIL1) in 2012 to help finance Crossrail. MCIL2 superseded MCIL1 on 1st April 2019. MCIL2 rates vary by Borough and by use in the Central London and Isle of Dogs charging areas. MCIL2 will contribute to the funding of Crossrail 1 and 2.
- 8.6 LBC falls within Band 1, for all development (except for the rates for office, retail and hotel in Central London and the Isle of Dogs, and for health and education in all of Greater London) within Band 1 the MCIL2 charging schedule outlines a rate of:
- £80 per sqm (excluding indexation)
- 8.7 The site does not fall within the Central London and the Isle of Dogs area. Therefore, these rates do not apply.
- 8.8 For health and education developments in London the MCIL charging schedule outlines the following rates:
- Development used wholly or mainly for the provision of any medical or health services except the use of premises attached to the residence of the consultant or practitioner: Nil
 - Development used wholly or mainly for the provision of education as a school or college under the Education Acts or as an institution of higher education: Nil

Camden CIL

- 8.9 LBC adopted its own CIL charging schedule that is applied alongside Mayoral CIL to secure funding for identified infrastructure within the borough. The schedule came into effect on 1st April 2015 and applies at differing rates dependant on the proposed use and the location of the site within the Borough.
- 8.10 As the site is identified with CIL Charging Zone B (Rest of Camden), the proposals are subject to the following per sqm charges (excluding indexation):
- Retail (including bar/restaurant/entertainment and other town centre uses): £25 per sqm
 - Health and Education uses: £0 per sqm
 - Research and Development uses: £0 per sqm

LBC CIL Examination

- 8.11 LBC is proposing to increase the rates in Camden for offices, research and development and hotels uses in Central London. In addition, Camden propose to adjust the rates for other uses in line with building cost inflation. LBC submitted revisions to its CIL charging schedule for an Examination in Public on the 20th February 2020.
- 8.12 Under the revised charging schedule, the site remains within CIL Charging Zone B (Rest of Camden), the proposed revised rates are:
- Offices, Research and Development: £32 per sqm
 - Retail (including bar/restaurant/entertainment and other town centre uses): £32 per sqm
 - Health and Education uses: £0 per sqm
- 8.13 Camden intends to adopt the revised schedule as set out in the Examiners report later this year.

Camden Planning Obligations

- 8.14 **Table 8.1** sets out the anticipated capital contributions which will form Heads of Terms for the legal agreement pursuant to s106 of the Town and Country Planning Act 1990:

| Head of Term | Method of Calculation |
|--|--|
| Footbridge Contribution | Negotiation |
| Construction Contribution and Bond | Based on scale / Policy requirement |
| Highways Contribution | Based on quote from Highways Engineers |
| Pedestrian Cycling and Environmental Improvements Contribution | Based on scale of final scheme |
| Travel Plan Monitoring Contribution | Based on scale / Policy requirement |

| | |
|--|----------------|
| Legible London Signage Contribution | Negotiation |
| Contribution towards the cost of last half mile enhancements | Negotiation |
| Public Open Space Contribution | Policy formula |
| Carbon Offset Contribution | Policy formula |
| Apprenticeship Contribution | Policy formula |

Table 8.1: Capital Contributions

8.15 **Table 8.2** sets out the anticipated non-capital contributions which will form Heads of Terms for the legal agreement pursuant to s106 of the Town and Country Planning Act 1990:

| Head of Term |
|--|
| Car-free development |
| Basement Impact Assessment Outcomes: <ul style="list-style-type: none"> - Approval in Principle - Basement Construction Plan (BCP) |
| Construction Management Plan |
| Levels Plan/Interface Details |
| Delivery and Servicing Management Plan |
| Stopping up order on St Pancras Way |
| Travel Plan |
| NEPT Management Plan |
| Keep clear agreement for under colonnade |
| Securing Section 278 Agreement |
| Community Outreach Plan |
| Community Safety Management Plan |
| Public Realm Plan |
| Public Art Plan |
| Energy Plan |

| |
|--------------------------------------|
| Sustainability Plan |
| Employment, Skills and Training Plan |
| Interim Landscape Plan |
| Phasing Plan |

Table 8.2: Non-Capital Contributions

8.16 We note that the administrative and staff costs of monitoring S106 obligations are financed through a charge per obligation. The Applicant will be requested to pay LBC’s legal and technical costs in connection with the preparation and completion of a legal agreement.

9. Scheme Benefits

- 9.1 In presenting an assessment of the overall planning policy case and in addressing the planning balance, it is necessary to consider the planning and community benefits of the proposed development.
- 9.2 The proposal will deliver a landmark scheme for the Camley Street and St Pancras Area. The scheme constitutes an appropriate re-use of this brownfield site as well as delivering environmental, social and economic benefits to the local residents and businesses.

Environmental

- **Use of Previously Developed Land** – In conformity with sustainable planning principles, this development is on previously developed land.
- **Optimisation of Underutilised Land** – The proposal optimises the use of the site through the sensitive addition of new floorspace.
- **World Class Design and Architecture** – The proposals are designed by a leading architectural practice and will deliver high quality design, architecture and layout, utilising innovative materials.
- **Provision of Sustainable Technologies** – Provision of sustainable technologies and renewable energy to drive environmental performance, including 864 sqm of roof mounted photovoltaic (PV) panels, a ground source heat pump system and an air source heat pump system.
- **Highly Accessible Location** – The site is accessible by all modes of transport and has the highest achievable Public Transport Accessibility Level (PTAL) of 6b (measured on a scale of 0 to 6b, where 6b is the highest). The site is in close proximity to King’s Cross, St Pancras, Euston and Mornington Crescent Stations, providing excellent connections to large parts of the UK as well as access to six London Underground Lines and the Overground.
- **Promotion of Sustainable Transport** – In line with LBC’s policy on parking and the highly sustainable location of the site, the proposed development will have no car parking (aside from disabled parking). This will have benefits for the air quality and traffic congestion in the surrounding area.
- **Cycling** – Providing 502 cycle spaces and creating excellent showering, changing and storage facilities to encourage workers to cycle to improve health and well-being and reduce congestion and air pollution.
- **Biodiversity Net Gain** – The existing site is of low ecological value due to the limited green habitat within the site, the baseline biodiversity value is 0.47 area-based units. A high-quality hard and soft landscaping scheme is proposed which will improve the biodiversity of the site. The landscaping proposals will result in a gain of 0.11 biodiversity units, equating to a 23.16% increase.

Social/Community

- **State-of-the-Art Specialist Building for Ophthalmology** – Oriel is a partnership between Moorfields, MEC and UCL IoO to build a new shared home that will enable the partners unprecedented quality of clinical, research and education outcomes. The new facility will offer the best experience for patients and staff, as well as speed up the development of new research and treatments.
- **Efficient Use of Resources and Enhanced Collaboration** – The proposals seek to co-locate Moorfields Hospital at City Road and the UCL IoO into a purpose built, integrated facility that will bring together clinical care, research and education expertise. The existing buildings are more than 125 years old and are no longer suited to the provision of 21st-Century clinical care, research or education.
- **Public Role of the Building and Interactions with Local, Regional and National Communities-** The proposals will help to contribute to the local community of LBC, London and beyond by providing the following: a dedicated exhibition space, static displays throughout the building, local school engagement and a digital offering to reach more distant communities.
- **Improved Internal Wayfinding** – Feedback from patients and carers is very positive about the clinical care received at Moorfields but does include concerns about the difficulties experienced when navigating through the building, describing the layout of the City Road buildings as confusing, the waiting areas as overcrowded with insufficient seating and poor levels of natural light. The interior of the new building is designed for everyone, using materials, colour, tactility and technology to aid wayfinding and navigation around the building.
- **Roof Garden** – At sixth floor level, the staff and students will have access to a south facing roof garden with spectacular views over London.
- **Reducing Crime** – The scheme will introduce active ground floor frontages, increasing the vibrancy of the area and natural surveillance to reduce crime and the opportunities for committing crime.
- **Enhanced Safety and Security** – The scheme has been designed in accordance with ‘Secured by Design’ principles.
- **Dedicated drop-off / pick-up** – A private patient transport drop-off and pick-up is proposed in a new layby on St Pancras Way, close to the south-west entrance and the A&E department. This will accommodate anyone unable to use public transport.
- **On-site Servicing** – Servicing of the building will take place to the north off Granary Street, away from public entrances. The design accommodates a generous delivery yard within the building which provides a level ground for vehicles. The yard has been carefully designed and tracked to ensure all vehicular movements into and out of the building are forward facing.
- **Improved Public Realm** – Improvements are proposed to the local environment, this includes replacing and upgrading the immediate public realm with a high-quality hard and soft landscaping proposal. The removal of the existing high brick perimeter wall will enhance permeability across the

site and provide greater connections to the Canal, St Pancras Gardens and surrounding sites. The lower ground floor and ground floor have been designed to create active frontages and a lively public realm. The atrium forms a new internal public realm at the heart of the building, rising up through the centre of the atrium is 'the Oriel', a rising stack of floor plates containing the main public lifts and stairs, connecting to the departments via generous bridges at each level.

- **Moorfields Eye Charity** – MEC provides financial support to Moorfields, supporting building projects, new equipment, pioneering research, training opportunities, development of Moorfields staff to ensure the care they provide is outstanding, public education about eye health and improving the experience for Moorfields patients and their families.

Economic

- **Viability** – The proposed development will ensure a viable, long-term future for the site.
- **World Leaders in Ophthalmic Research and Education** – The provision of this new facility will strengthen the existing UK and International impact and profile of Moorfields and UCL IoO. Together, they provide globally recognised research, excellent education and outstanding clinical care. The world-leading collaboration between the Oriel Partners will enable the largest ophthalmic research programmes in the world and cutting-edge studies into the care of eye disorders and diseases. Moorfields and UCL IoO have a long history of expertise in eye care, research and education – *they are the only hospital-university partnership that is ranked number one globally in any medical field.*
- **Job Creation through the Demolition and Construction Phase** – Considering the total investment and build cost of the project⁵, the total full-time jobs generated per year direct would be 512. This would amount to some 2,231 contractors being employed at the site based on indicative multipliers. The generation of 512 full time jobs per year would contribute an additional £23.5 million to the economy per year of the development, or £79.9 million over the full duration of the construction period⁶.
- **Job Creation through the Occupation Phase** – The provision of health and research related jobs and 10-14 Full Time Equivalent Retail Jobs.
- **Training Opportunities** – The applicant is committed to working with their contractors, suppliers and occupiers to get the most from this development. As part of the proposed development, opportunities to provide training, apprenticeships and work experience in a range of demolition and construction trades will be secured by the Section 106. For example, there would be opportunities for local young people to gain National Vocational Qualification (NVQ) Level 2 and Level 3 training and practical experience in a range of different demolition and construction, and engineering trades.

⁵ Approximate build cost of £260 million over 41 months

⁶ <https://www.randstad.co.uk/about-us/industry-insight/construction-pay-soars-brexodus-skills-shortage-bites/>

- **Supporting Camden STEAM** – The applicant is keen to support the ambitions of Camden’s STEAM Commission, and its role in developing creative, digital and scientific career opportunities within the Borough.
- **Significant Investment in Health Care Sector** – The proposals represent a significant financial investment in the health sector benefiting LBC, London and UK generally.
- **Investment in London’s Knowledge Quarter** – The site sits within London’s Knowledge Quarter, an area which has one of the highest densities of knowledge based, cultural and scientific businesses of anywhere in the world. The proposed facility will be a welcome contribution to this existing cluster.
- **Regeneration of the Local Economy** – The local economy will benefit from the ‘ripple effect’, from new employee expenditure on local goods and services.
- **Investment in Camden** – This proposal supports the continued growth of the London economy and will generate significant financial investment in Camden.
- **Business Rates** – There will be a significant contribution to business rates to Camden. It is estimated that once operational, the proposed development could generate approximately £2.76 million (gross) in business rates. This is based on LBC’s average rateable value (per sqm)⁷ and assumes application of the charitable rate relief of 80%⁸.

⁷ Valuation Office Agency (VAO) LBC Average Rateable Value of £297 per sqm

⁸ Gov.UK, Charities and community amateur sports clubs can apply for charitable rate relief of up to 80% if a property is used for charitable purposes.

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