



Mr John Diver
London Borough of Camden
Development Management
5 Pancras Square
London
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Direct Dial: 020 7973 3091

Our ref: P01306430

2 December 2020

Dear Mr Diver

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**ST PANCRAS HOSPITAL 4 ST PANCRAS WAY LONDON NW1 0PE
Application No. 2020/4825/P**

Thank you for your letter of 12 November 2020 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

Historic England recognises the development potential of the site. The proposals are considered to result in less than substantial harm to the Kings Cross St Pancras Conservation Area and we recommend that ways of minimising this impact are explored. We recommend that this should include the submission of additional winter views so that the nature and extent of the impact can be properly understood.

Historic England Advice

Significance of the heritage assets

The development site lies in the Kings Cross St Pancras Conservation Area; the designation covers a large area and its appraisal divides it into four sub areas. Sub Area 1 is centred on St Pancras Gardens, a public park in the grounds of St Pancras Old Church.

The site forms part of the St Pancras Hospital complex which is located immediately to the north of the gardens. This began life in the early eighteenth century as the St Pancras Workhouse, which existed in several different iterations until a somewhat disjointed rebuilding programme started in the late nineteenth century. A relatively coherent group of Victorian buildings from this phase survive today and play a significant role in defining the character and appearance of this part of the



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conservation area. Later additions and rebuilding took place in the twentieth century, in converting the workhouse into a hospital, and following significant bomb damage.

All of the buildings which form part of the St Pancras Hospital complex were issued with a Certificate of Immunity (from listing) in 2015 and these have recently expired. The majority of the historic hospital buildings are considered to make a positive contribution to the character and appearance of the conservation area, as set out in the appraisal. Other buildings which illustrate the evolution of the site in the twentieth century, but are architecturally undistinguished, are considered to make a neutral contribution.

St Pancras Gardens was laid out in the late nineteenth century as a public garden, occupying the church yard of St Pancras Old Church and the burial ground of St Giles in the Fields. The park itself is a Grade II registered park and garden, and it contains many individually listed tombs at Grade II. The Church itself and the Burdett-Coutts Memorial Sundial are Grade II* listed and the tomb of Sir John Soane is Grade I listed.

The proposals and their impact

The proposals are for the partial redevelopment of the site involving the demolition of several buildings - some of which are considered to make a positive contribution to the conservation area and as such they may be termed non-designated heritage assets. Following this, a new health care building of 7-10 storeys in height would be constructed.

The principal impact of the development, in so far as Historic England's remit is concerned, would be on the significance of the conservation area. To a lesser extent, there is also a potential impact on the settings of the aforementioned Grade I and II* listed buildings.

Relevant policy and guidance

The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making. At the heart of the framework is a presumption in favour of 'sustainable development', a key component of which includes protecting and enhancing the historic environment.

Paragraph 189 states that 'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance...'

Paragraph 190 states that 'Local planning authorities should identify and assess the



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particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.'

Paragraph 193 states that when considering the impact of a proposed development on the significance of a designated heritage asset, 'great weight' should be given to the asset's conservation, and paragraph 194 states that any harm should require 'clear and convincing justification'. Where proposals would lead to less than substantial harm, paragraph 196 requires the harm caused to be weighed against the public benefits of the proposal.

Paragraph 201 states that 'Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. 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'

Historic England's position

The site is allocated for development in the adopted and draft Local Plans, and the retention of health and related services onsite is supported. The development forms part of the wider 'Project Oriel' which seeks to provide new accommodation for eye related health care, research and education, and has implications for several other existing health care sites. We recognise that significant public benefits are likely to be attributed to the delivery of this project.

The proposals are considered to result in harm to the conservation area through the demolition of buildings which contribute positively to its significance - particularly the Victorian laundry and kitchen buildings. Such ancillary buildings are important in the understanding of function of the site and would therefore represent regrettable losses. However, all of the other late-nineteenth century buildings would be retained, comprising of the substantial ward blocks and the rarer workhouse chapels for example. These are located on the perimeter of the site and therefore generally play a more prominent role in conservation area views. Overall, we consider this to be an acceptable way to approach the redevelopment of the site.

Given the scale of the redevelopment, it would have a dramatic impact on the character and appearance of this part of the conservation area. Whilst this would not necessarily result in harm in principle, we consider that the prevalent Victorian



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institutional character would be diminished, as the new building would have dominant relationship with the majority of the retained historic buildings.

The proposed development would be visible to varying degrees from St Pancras Gardens, and this would vary seasonally. It would partly be screened by the retained historic buildings on the perimeter of the site, but would rise above them and appear in the large gaps between them. The submitted visual representations of the development from St Pancras Gardens use photomontages showing how it might appear in the summer months. We strongly recommend that photomontages are requested which show the trees without leaves in addition to these, so that the impact can be properly understood.

Any harm arising from the uncharacteristic scale of the proposals could likely be mitigated and minimised through refining the design so that it has a more comfortable relationship with the existing character and appearance of the conservation area. We do not wish to comment on this in detail, and consider that the use of terracotta as the primary cladding material could be successful in principle. However, the pale colour is particularly strident in relation to the predominant red and stock brick. Earlier iterations of the design appear to show a more contextual colour palette and we would encourage this to be revisited.

Overall, the level of harm to the conservation area is considered be 'less than substantial' in the language of the NPPF and ultimately it is for the local authority to weigh this harm against the public benefits arising from the development. Before this balancing exercise is undertaken, we recommend that you are satisfied that the harm has been minimised in accordance with the aspirations of the NPPF.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 189, 190 and 194 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.



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Historic England

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

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