

<b>Delegated Report</b>		<b>Analysis sheet</b>		<b>Expiry Date:</b>	11/02/2020
		N/A / attached		<b>Consultation Expiry Date:</b>	n/a
<b>Officer</b>			<b>Application Number(s)</b>		
John Diver			2020/0298/P		
<b>Application Address</b>			<b>Drawing Numbers</b>		
Plot 1 St Pancras Hospital 4 St Pancras Way London NW1 0PE			Refer to draft Decision Notice		
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>		
<b>Proposal</b>					
Request for screening opinion for construction of a specialised ophthalmology clinical, research and education facility at St Pancras Hospital site, plot 1.					
<b>Recommendation(s):</b>		EIA Not Required			
<b>Application Type:</b>		Request for Screening Opinion			
<b>Conditions or Reasons for Refusal:</b>		Refer to Draft Decision Notice			
<b>Informatives:</b>					
<b>Consultations</b>					
As this application is an EIA Screening Opinion, no statutory consultations are required.					

## Site Description

The 0.9 hectare 'Oriol site' relates to a broadly rectangular plot at the North Western corner of the St Pancras Hospital, located within the St Pancras ward of the Borough. The site currently host a collection of 7 buildings of between one and two storeys in height (some with basements) comprising approximately 6000sqm of medical and healthcare provision (Use Class E(e)). The remainder of the St Pancras hospital site falls outside of the redline boundary and so would not be included within the development site.

The wider hospital site is bordered by St Pancras Way to the West, Granary Street to the North and East and by St Pancras Gardens to the South. Further to the East lies the Regents Canal, which provides a link from the Paddington Arm of the Grand Union Canal to the Limehouse Basin and the River Thames in east London.

The site falls outside of, but is in proximity to:

- A Habitat Corridor (the Regents Canal);
- Open Spaces (the Regents Canal, Goldington Crescent gardens and St Pancras gardens);
- Site of Nature Conservation Importance (the Regents Canal); and
- Just to the west of the lateral assessment area of the designated viewing corridor for the protected vista from Parliament Hill to St Paul's Cathedral.

At present, the entire St Pancras Hospital site is owned by Camden and Islington NHS Foundation Trust (C&I), who deliver a range of mental health services in London. Whilst still operating a range of services from the site, the St Pancras Hospital 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 for a number of years. It is also included within adopted Site Allocations document (2013) where it is regarded as having potential for redevelopment.

## Relevant History

**2020/4825/P** – Application submitted seeking: *'Partial redevelopment of the site, involving the demolition of seven existing buildings (Ash House, Bloomsbury Day Hospital, the Camley Centre, Jules Thorn Day Hospital, Kitchen and the Post Room & Former Mortuary) and construction of a part seven, part ten storey (plus roof plant) purpose-built eyecare, medical research and educational centre for Moorfields Eye Hospital, the UCL Institute of Ophthalmology and Moorfields Eye Charity.*

*New building to comprise a mixture of clinical, research and education purposes, including eye care accident and emergency department, outpatients, operating theatres, research areas, education space, cafe and retail areas, admin space and plant space.*

*Associated site relandscaping works including formation of patient drop off area to St Pancras way, new public realm and routes through the site, cycle parking and servicing ramp and cross over to Granary street.'*

At the time of writing, the assessment of the case remains ongoing.

## Relevant policies

**Town & Country Planning Act 1990**

**Development Management Procedure Order 2015**

**Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended 2019)**

**National Planning Policy Framework (NPPF) 2019**

**National Planning practice guidance (NPPG) (Environmental Impact Assessments May 2020)**

## **Assessment**

### **1. Proposal**

- 1.1. An Environmental Impact Assessment (EIA) Screening Opinion has been submitted for consideration in respect of the proposed application for the partial redevelopment of the St Pancras hospital site including the demolition of seven existing buildings and their replacement with a single building of between seven and ten storeys in height.
- 1.2. The proposed building would feature a footprint of approximately 6,200sqm comprised of two interlinking wings and a central atrium space. The building would provide a total internal area of approximately 47,100sqm (GIA) to include a composite mix of medical/health care, clinical research, education and ancillary plant, retail and café uses (sui generis use class). In addition, a new vehicular drop off area would be provided on St Pancras way with the remaining site curtilage re-landscaped to provide seating, short stay cycle parking as well as pedestrian walkway through the site.

### **2. Assessment**

2.1. The 2017 EIA Regs (as amended 2019) defines EIA development as being either:

- Schedule 1 development, where an EIA is always required; or
- Schedule 2 development, where development meets thresholds set out in this schedule and is also considered likely to have significant effects on the environment by virtue of factors such as its nature, size or location in a sensitive area.

2.2. Projects which are described in the first column of Schedule 2 but which are wholly outside sensitive areas and which do not exceed the relevant thresholds, or meet the criteria in the second column of the Schedule, are not Schedule 2 development.

#### **Site sensitivity**

2.3. The regulations note that the more environmentally sensitive the location, the more likely it is that the effects on the environment will be significant and will require an Environmental Impact Assessment. Regulation 2(1) defines 'sensitive areas' to include:

- Sites of Special Scientific Interest and European sites;
- National Parks, the Broads and Areas of Outstanding Natural Beauty; and
- World Heritage Sites and scheduled monuments.

2.4. The application site is not considered a 'sensitive site' in line with the criteria set out within the EIA regulations, as it falls outside of any statutorily designated ecological, geological or landscape areas. The Site is considered to be a previously intensively developed brownfield site by virtue of its current use as St Pancras Hospital and its historic use as a workhouse.

2.5. It is noted that the site is in relatively close proximity to a key habitat corridor, a SINC as well as being within a conservation area and adjacent to an archaeological priority area. However, no part of the development site or its curtilage would fall within these assets. The impact to the setting of these assets would be considered and assessed as part of a formal planning application and would not mean that the site is considered 'sensitive' in accordance with the EIA regulations.

#### **Schedule one development**

2.6. The development does not fall within any of the descriptions given in Schedule 1 and thus cannot be considered a Schedule 1 development.

## **Schedule two development**

- 2.7. Although the development would provide a new, major medical research facility, the applicants have confirmed that the premises would not be used for the purposes of the production of pharmaceutical products, meaning that it would not fall within 6(b) from within this schedule, which is 'Chemical industry'.
- 2.8. However, the development is considered to fall within part 10(b) of this schedule, which is an "urban development project".
- 2.9. Column 2 sets out the exclusion thresholds and criteria for which schedule 2 development proposals need to be screened by the LPA. For part 10(b), these include:
- (i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
  - (ii) the development includes more than 150 dwellings; or
  - (iii) the overall area of the development exceeds 5 hectares.
- 2.10. The proposed footprint of the new building would be approximately 0.62ha. Including areas of new landscaping within the site, the overall development area is approximately 0.99ha. No dwellings are proposed and the total floor area created as a result of the development would be less than 5 hectares. This means that the proposed development does not meet any of the above Schedule 2 category 10(b) thresholds.
- 2.11. In accordance with the EIA screening process, proposed development will therefore not constitute schedule 2 development as defined by the EIA Regulations. As a result of the above, there is also no formal requirement to test the proposal against the criteria set out in schedule 3.

## **Precautionary approach**

- 2.12. Although the proposal does not meet the definitions of schedule 1 or 2 development as defined by the regulations, it is noted in NPPG that schemes can still on occasion be EIA development even if they fall below the thresholds. This would be if they would still be likely to cause significant environmental impacts despite not falling within schedule 1 or 2. The NPPG provides a set of indicative criteria and thresholds, and key issues to consider to help determine whether a development is likely to have significant effects (based on that set out in schedule 3). This includes matters relating to the:
1. Characteristics of development;
  2. Location of development; and
  3. Types and characteristics of the potential impact.
- 2.13. Given that the development is still very significant and is not far below the thresholds set out in schedule 2, it will be considered against the above under a precautionary approach. To aid in this assessment, initial technical reporting has been provided that relates to:
- Air Quality;
  - Archaeology and Built Heritage;
  - Climate Change;
  - Daylight, Sunlight, Overshadowing and Solar Glare;
  - Ecology and Biodiversity;
  - Ground Conditions;
  - Health and Wellbeing;
  - Major Accidents and Disasters;
  - Noise and Vibration;
  - Socio-economics;
  - Townscape and Visual Impacts;

- Traffic and Transport;
- Waste and Resources;
- Water Environment;
- Wind Microclimate; and
- Cumulative Effects with Other Developments.

#### Character of development

- 2.14. The development would involve the redevelopment of part of the existing hospital site to provide a new medical, research and education facility. The proposed use would remain consistent to the existing and established use of the site, which has remained ongoing since the first conversion of the former workhouse buildings into a hospital in the early 20<sup>th</sup> century. The existing brownfield site is therefore considered to have been already been intensively developed. In terms of scale, the proposed uplift of c.41,000sqm and increase in building height from 2 to 10 storeys within the site would be substantial. However, the proposal would still remain comparable in scale to the new developments that exist, have been approved or are under construction within the local vicinity (discussion in terms of cumulative effects are given later in the report).
- 2.15. In terms of increase in traffic, emissions and noise the proposals as described in the submitted application are not considered likely to have any greater than borough scale impact . Whilst the proposal would have potential to cause pollution and nuisances arising from the construction process in the short term, neither the extent, nor severity of these impacts is considered likely to be such that could not be properly assessed with the aid of standalone reports and assessments accompanying the application.
- 2.16. In terms of the use of natural resources, although the development would require the use of a variety of materials to allow, such materials would be required to comply with modern building standards and the relevant sustainability/energy efficient construction techniques. These would be considered and assessment as part of a future sustainability and energy assessment. As such no significant impacts are envisaged in this regard. Regarding the production of waste, again modern construction techniques which will be required to be used in the construction stage minimising wastes in compliance with relevant legislation and would be unlikely to lead to significant impacts. Furthermore, a site waste management plan is likely to be put in place to provide guidance which will facilitate the goal of diverting the majority of construction waste from landfill and ensure that the principles of a circular economy are embedded in the scheme.
- 2.17. In terms of pollution and nuisances and accidents, the likely construction management plan, acoustic assessment, health and safety regulations and the energy strategy for any scheme would all be of relevance. When considered together, such statements, incorporating various measures, mean that pollution and nuisances would be limited as far as possible, as would the risk of accidents. In relation to the operation stage, the end uses are not considered to give rise to adverse impacts on the environment that are complex, or require further investigation, given they are compatible with surrounding land uses.

#### Environmental sensitivity of location of development

- 2.18. The site is not considered sensitive against the criteria set out within the regulations. As aforementioned, the proposal would relate to a brownfield site currently occupied by hospital buildings which has limited natural resource or environmental value. The majority of the site features either buildings or hard surfacing landscaping / surface parking, though there are some areas of amenity lawn and planting. Notwithstanding the site is in relatively close proximity to a number of nature consideration assets such as the Regents Canal, St Pancras gardens and is within the Kings Cross conservation area.
- 2.19. The submitted ecology habitat survey has noted that the site offers little in the way of habitat potential and found no evidence of the use of the site by any protected species for habitat /

foraging. Both the shading/microclimate impact of the proposed buildings and the re-landscaping associated with potential public realm proposals are not likely to have impacts on the canal or St Pancras garden ecology locally. These impacts can be addressed by an ecological assessment provided with the application but are not considered substantial or wider reaching either in themselves or cumulatively with the neighbouring development sites to warrant an EIA.

- 2.20. There are designated heritage assets directly relating to the site and nearby, including two conservation areas and the listed gardens and structures connected with St Pancras Gardens nearby. However these are not sensitive areas as designated for the purposes of part 2 of Schedule 3 and the impact on these would be appropriately considered in a views or heritage assessment to accompany an application. The site is also close to the lateral assessment area for the protected vista from Parliament Hill to St Paul's Cathedral but this also, is not a 'sensitive area' and can be appropriately considered with reference to views analysis accompanying an application.

#### Types and characteristics of potential impacts

- 2.21. Supporting evidence has considered the potential impacts of the proposed development on a range of matters that are set out in para.2.13. In each case, it is found that the potential impacts would not feature a severity or magnitude that would extend beyond the local area assuming adequate mitigation secured through any formal planning approval, even when considered alongside the consented schemes on surrounding plots. In respect of these matters, in the context of the site description, nature of the development and comments already made in this assessment, the proposals would not result in such impacts ('significant effects') to warrant progression of the EIA to the scoping stage. The proposed scheme seeks to implement redevelopment of the site in an intensive yet conventional manner for its location; it is not considered to bring about any unusually complex or hazardous environmental effects.
- 2.22. Supporting evidence shows that the development would causes a displacement of some services within the existing buildings, with a plan set out for where these services are to be provided within the remainder of the hospital site or across the wider Camden property portfolio of CANDI and their partners. Moorfields have also confirmed that the operation at the existing City Road site would remain ongoing until the new premise is constructed to avoid any break in service provision. Whilst these impacts are perhaps more complex, given the ongoing coordination between parties / service providers and evidence of a plan for services to be accommodated elsewhere within the borough these are similarly not considered to mean that the proposal is considered EIA development.

#### Severability from wider St Pancras hospital future redevelopment

- 2.23. Notwithstanding the above, consideration has also been given as to whether or not the proposed development can remain fully self-contained and mutually exclusive of any future developments within the wider St Pancras hospital site. No planning permission exists for redevelopment of the wider site, however, the site as a whole is included with the adopted site allocation plan and the freeholders (CANDI) have made clear that they intend to bring forwards a separate scheme at some point in the future.
- 2.24. National planning guidance makes clear that when considering EIA screening submissions, an application should not be considered in isolation if, in reality, it is an integral part of a more substantial development. In such cases, the need for Environmental Impact Assessment must be considered in the context of the whole development. In other cases, it is appropriate to establish whether each of the proposed developments could proceed independently or not, demonstrating severability. In light of the above, clarification was sought that this proposal would not unduly impact the ability for the wider hospital site to come forwards for redevelopment and could also operate and be constructed in isolation from the wider site coming forwards.
- 2.25. In response to a request for further clarification on this matter, the applicant has provided a

additional evidence in the form of:

- Site plan showing the proposed development alongside both the existing, retained hospital buildings across the wider site;
- Site plan showing the proposed development alongside the indicative masterplan for the wider site provided by the adjacent freeholders;
- A Site Operation strategy document provided by the Camden & Islington NHS foundation trust (freeholders of wider site) detailing how the construction and operation of the proposal would not preclude the use of the remaining site, nor its future potential for redevelopment; and
- A draft construction management plan noted that all site works can be accommodated within the redline boundary

2.26. The evidence provided in terms of the operation of the building shows that, once constructed, the operation would not be reliant upon any part of the wider hospital site and all activities could be accommodated within the redline boundary. Servicing and deliveries would occur directly from Granary street and all drop offs accommodated in the new bay provided on St Pancras way. The two pedestrian entrances would be accessible through the new route provided through the site and the existing entrances to the retained buildings on site would remain unaffected. Some surface parking would be lost through the development, however, the larger area of parking towards the SW corner of the site would be retained for the use of the retained hospital buildings and the existing arrangements for servicing and deliveries could continue throughout the build and final operation.

2.27. In terms of construction, evidence provided in the form of a draft construction management plan also provide comfort that all site works could be accommodated within the redline boundary and would not be reliant on the wider site coming forwards for development. Clearly, the resulting impacts from this phase of works would need to be very carefully managed and controlled as part of the planning submission, however, the reporting provided in terms does demonstrate that these resulting impacts would remain localised. Mitigation to alleviate the impacts to operations of the wider site and safety of patients would also need careful consideration as part of the planning application, however again these impacts would remain local in nature and would not mean that the scheme would constitute EIA development.

2.28. Although not a formal approved plan, the illustrative masterplan for the wider site provided has been produced alongside both Moorfields as well as the Camden & Islington Trust and their appointed development partners. The plan provided aligns with the Council's own aspirations for the site, as set out in the Camley Street to Canal Side SPD (2020). Assessment is not given here in terms of the detailed design and overall acceptability of the parameters provide. However, the joint production of illustrative masterplan shows that the strategic ambitions for the site set out in the adopted development plan and SPDs could still be realised for the wider site if the proposals were to come forwards in the future.

2.29. The evidence provided is considered to show bi-lateral support between parties for the case that the proposal can remain fully severable from the wider hospital site and that both the operation and construction could proceed regardless of whether or not a future application for redevelopment of the wider site is forthcoming. As a result of the additional evidence provided, officers remain confident that this plot remains fully severable from the wider St Pancras hospital redevelopment, if it were to come forwards at some future point. Were such proposals to be forthcoming, a separate screening request for that plot would still be expected.

### **Cumulative impacts**

2.30. In addition, when issuing a decision the Council must have regard to the possible cumulative effects arising from surrounding developments.

2.31. There are two substantial new developments coming forward in the locality at nearby 101

Camley Street as well as the mixed use redevelopment of 2-6 Pancras way (known as the 'Ugly Brown building – UBB') to the North. 101 Camley Street which will provide 128 residential units is currently onsite and is nearing completion. 2-6 Pancras way has planning permission for 6 new buildings ranging from 2 to 12 storeys above basement to provide a mix of business, hotel, retail and gym floorspace as well as 73 residential units. Within the letter provided the applicants have also considered the resulting impacts of all other developments which have been approved or are being constructed in the wide region (1km). It is also noted that there are future ambitions for the redevelopment of the wider hospital site, though no permission is in place.

- 2.32. Accordingly, the technical reporting discussed above has also considered the cumulative impacts of the cumulative development proposed, both in terms of the overall environmental impacts but also the impacts of this proposal upon developments approved or under construction. In addition, since the submission further clarification in terms of the cumulative impacts of the wider hospital site, should it come forwards, has also been provided.
- 2.33. Whilst it is acknowledged that these are major applications, the evidence provided demonstrated that their potential cumulative impacts combined with the proposed development are not considered to be of more than local environmental significance. Even considered together with the current proposal. It is noted that these developments were subject to their own EIA screen applications, which reach similar conclusions. In submitted technical reporting, consideration has where possible also been included in terms of the resulting impacts of any future development of the wider hospital site. Although based on indicative modelling, this has also shown that environmental impacts for this cumulative development would be experienced locally only, not suggesting that the proposal should be considered EIA development.
- 2.34. Any transport impacts from this development would be covered by the Transport Assessment and Construction Management Plan submitted with the proposals on the site in question. Existing or committed schemes will form part of the baseline for the assessment and thus will be factored into the assessments. The proposed uses are compatible with surrounding land uses and the combined impact of these and the proposed medical use are not considered to warrant the requirement for specialist environmental information beyond the level which would normally be required with a planning application for the development in question.
- 2.35. Furthermore, although the proposal is located near the Kings Cross Central growth area the barriers of the Regents canal, national rail lines and physical separation mean that the environmental impacts from the developments in this area are not directly experienced at the application site, and vice versa. It is also noted that this area was subject to its own EIA when outline permission was granted.

#### Equalities impact

- 2.36. When forming the above assessment and recommendations, due regard has been paid to the Council's Public Sector Equality Duty (PSED) set out under Section 149 of the Equality Act 2010. This assessment and the recommendations are not considered to result in any disproportionate impacts to any protected group as defined 2010 Act. It is noted that this recommendations relates purely to the consideration of whether or not the proposals constitute EIA development as defined by the EIA regulations. As part of the consideration of the associated planning application, a full assessment of the resulting impacts of the specific scheme of development to the surrounding locality, residents, patients, staff and service users and the need for associated mitigation to alleviate risk to all protected persons will still be required. These recommendations do not pre-determine the outcome of the detailed assessment as part of the associated planning application.

### **3. Conclusions**

- 3.1. The proposal would not fall within the definition of schedule 1, or schedule 2 development as



defined by the EIA regulations.

- 3.2. The development does have potential to cause pollution and nuisances arising from the construction process in the short term, and the effects of its tall buildings on local microclimate in the longer term. The potential impacts would affect the setting of environmentally sensitive spaces in the form of public open space and a Site of Nature Conservation Interest. However, whilst the impacts in these respects would clearly be a significant factor in the assessment of this proposal, the associated impacts on local views and open space are issues that may be commonly encountered in the normal application process. Whilst there would be an effect on a site designated for its biodiversity value this is noted as being of Borough significance rather than of any wider value. Similarly effects on views to be considered, would not be wider than borough significance and an assessment of the designated London Views would be undertaken during the planning application process. Therefore, neither the extent, nor severity of these impacts is likely to be such that could not be properly assessed with the aid of standalone reports and assessments accompanying the application.
- 3.3. Given the above, and due to the proposed size, scale and nature of the proposal and the characteristics of the surrounding area, it is considered that the scheme would not be of more than local importance. Furthermore, the scheme would not be within an 'environmentally sensitive location' or 'create any unusual or hazardous effects' pursuant to the selection criteria of Schedule 3 of the EIA regulations 2017 (as amended).
- 3.4. Therefore, the development is not considered to be EIA development as defined by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended 2020).