

Address:	St Pancras Hospital 4 St Pancras Way London NW1 0PE		No.2
Application Number(s):	2020/4825/P	Officer: John Diver	
Ward:	St Pancras & Somers Town		
Date Received:	19/10/2020		
Proposal:			
<p>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.</p> <p>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.</p> <p>Associated site re-landscaping 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.</p>			
Background Papers, Supporting Documents and Drawing Numbers:			
<p>Existing plans: Prefix (ORL-PPA-XX-XX-DR-A-): 20100 rev P5, 20101 rev P4, 20102 rev P4, 20103 rev P4, 20104 rev P4, 20105 rev P4, 20106 rev P3, 20107 rev P3, 20108 rev P3, 20109 rev P3, 20110 rev P4;</p> <p>Demolition plans: Prefix (ORL-PPA-XX-XX-DR-A-): 20120 rev P4, 20121 rev P4, 20122 rev P4, 20123 rev P3, 20124 rev P3, 20125 rev P3, 20126 rev P5, 20127 rev P4, 20128 rev P4, 20129 rev P3;</p> <p>Proposed plans: Prefix: (ORL-PPA-XX-): XX-DR-A-20240 rev P6, LG-DR-A-20241 rev P7, GF-DR-A-20242 rev P6, 01-DR-A-20243 rev P6, 02-DR-A-20244 rev P4, 03-DR-A-20245 rev P4, 04-DR-A-20246 rev P4, 05-DR-A-20247 rev P4, 06-DR-A-20248 rev P4, 07-DR-A-20249 rev P4, 08-DR-A-20250 rev P4, 09-DR-A-20251 rev P4, 10-DR-A-20252 rev P4, RF-DR-A-20253 rev P3;</p> <p>Use Plans: Prefix: (ORL-PPA-XX-LG-DR-A-): 20260 rev P4, 20261 rev P3, 20262 rev P3, 20263 rev P2, 20264 rev P2, 20265 rev P2, 20266 rev P2, 20267 rev P2, 20268 rev P2, 20269 rev P2;</p> <p>Proposed sections: Prefix: (ORL-PPA-XX-XX-DR-A-): 20300 rev P5, 20301 rev P5,</p>			

20302 rev P5, 20303 rev P5, 20304 rev P5, 20305 rev P5;

Proposed elevations, treatment and materials: Prefix: (ORL-PPA-XX-XX-DR-A-): 20400 rev P5, 20401 rev P6, 20402 rev P5, 20403 rev P5, 20404 rev P6, 20405 rev P5, 20700 rev P5, 20701 rev P4, 20702 rev P4, 20703 rev P1; ORL-WHA-ZZ-GF-DR-L-110010

Supporting documents: Air Quality Assessment ORL-INF-XX-XX-RP- PL- 120 dated October 2020; Arboricultural Impact Assessment ORL-INF-XX-XX-RP- PL-130 dated October 2020; Archaeological Desk Based Assessment ORL-INF-XX-XX-RP- PL-140 dated October 2020; Bat Survey ORL-INF-XX-XX-RP- PL-150-2019 dated October 2020; Basement Impact Assessment ORL-INF-XX-XX-RP-PL-330 Revision 5.0 dated May 2021; Desktop Ground Movement Assessment rev.2.0 dated May 2021; Basement Impact Assessment Proforma ORL-INF-XX-XX-RP- PL-335 dated October 2020; Biodiversity Net Gain Assessment ORL-INF-XX-XX-RP- PL-160- Metric 2.0 dated October 2020; Circular Economy Statement ORL-INF-XX-XX-RP- PL- 180 dated October 2020; Covering Letter ORL-INF-XX-XX-RP- PL-010 dated 16th October 2020; Daylight, Sunlight and Overshadowing Report ORL-INF-XX-XX-RP-PL-190 Revision 1.0 dated February 2021; Delivery and Servicing Plan ORL-INF-XX-XX-RP- PL-200 dated October 2020; Design and Access Statement ORL-INF-XX-XX-RP- PL-100 Rev P04 dated 15.10.20; Designing Out Crime Statement ORL-INF-XX-XX-RP- PL- 105 dated November 2020; Energy Strategy ORL-INF-XX-XX-RP- PL- 220 dated October 2020; External Lighting Assessment ORL-INF-XX-XX-RP- PL-280 dated October 2020; Fire Safety Statement ORL-INF-XX-XX-RP- PL- 230 dated October 2020; Flood Risk Assessment and Drainage Strategy ORL-INF-XX-XX-RP- PL- 240 dated May 2021 Rev 1.0; Illustrative Parameters Plan for remaining site (1906_P_0001, 1906_P_0002, 1906_P_0003 Rev A); Landscape Design Report ORL-INF-XX-XX-RP- PL- 270 dated October 2020; Noise and Vibration Assessment ORL-INF-XX-XX-RP- PL-290 dated October 2020; Operational Recycling and Waste Management Plan ORL-INF-XX-XX-RP- PL- 370 dated October 2020; Outline Construction Management Plan ORL-INF-XX-XX-RP- PL-170 dated May 2021 rev 1.0; Phase 1 Geotechnical and Geoenvironmental Desk Study Report ORL-INF-XX-XX-RP- PL- 260 dated October 2020; Planning Statement ORL-INF-XX-XX-RP- PL-110 dated October 2020; Preliminary Ecological Appraisal Report ORL-INF-XX-XX-RP- PL-320 dated October 2020; Social, Economic and Health Impact Report ORL-INF-XX-XX-RP- PL-210 dated October 2020; Statement of Community Involvement ORL-INF-XX-XX-RP- PL-310 dated October 2020; St Pancras Hospital Operational Strategy (Camden & Islington NHS Foundation Trust supporting letter); Sustainability Statement ORL-INF-XX-XX-RP- PL- 340 dated October 2020; Townscape, Heritage and Visual Impact Assessment ORL-INF-XX-XX-RP- PL- 250 dated November 2020; Transport Assessment ORL-INF-XX-XX-RP- PL- 350 dated October 2020; Travel Plan ORL-INF-XX-XX-RP- PL- 360 dated October 2020; Tree Survey Report ORL-INF-XX-XX-RP- PL-135 dated October 2020; Wind Microclimate Assessment ORL-INF-XX-XX-RP- PL dated October 2020; Whole life carbon assessment Report dated March 2021; Updated areas schedule

210312 Rev J. **Post submission technical queries and notes:** Air Quality Responses via Email at 13:04 on 09/02/2021; Archaeology Responses via Email at 16:06 on 09/02/2021; Biodiversity technical note dated February 2021; City Road Floorspace via Email at 16:09 on 07/12/2020; Energy and sustainability technical note dated March 2021; Flood Risk Assessment and Drainage Strategy technical note #1 dated February 2021; Green Line Route A1_1 Figure: 60588325-GL-001_Rev A dated 13/04/2021; Green Line Route A1_2 Figure: 60588325-GL-001_Rev A dated 13/04/2021; Proposed Highway to be Stopped Up (Ref: 60588325-SU-001); 29.04.21 Response Note to TfL; Design and Access Statement Addendum ORL-INF-XX-XX-RP-PL-100-AD Rev P01 dated 30.04.21; CMS Summary of the Collaboration Agreement between C&I, KC (SPH) Limited Partnership and Moorfields Eye Hospital NHS Foundation Trust – ‘Letter to Guy Bransby – 20.04.2021; Oriel – Building Decant Possession Strategy 210505; Landscape Design (Arboriculture) technical note dated March 2021; Thames Water Comments – TW reference 2020/4825/P via Email at 17:14 on 23/02/2021; Thames Water Comments via Email at 15:08 on 09/02/2021; Thames Water letter DS6081542_Pre Dev Capacity letter_red dated 26 February 2021; Townscape, Heritage and Visual Impact Assessment Addendum dated February 2021; Transport Last Half Mile – Green Line Proposals 0046801-3608 Revision P01 dated 1 March 2021; Transport note TN001: Responses to LB Camden Comments dated 5 February 2021; Transport note TN002: Response to LB Camden Comments – Mode Share dated 18 Feb 2021; Transport note TN003: Patient Travel Behaviour dated February 2021; Transport note TN004: Travel Behaviour Survey Results dated 22 March 2021; Transport Technical Queries on Cycle Provision dated March 2021; Transport: Outline Construction Management Plan ORL-INF-XX-XX-RP-PL-170 Revision 1.0 dated March 2021

RECOMMENDATION SUMMARY: Grant conditional planning permission subject to legal agreement

Applicant:	Agent:
Moorfields Eye Hospital Foundation Trust, UCL Institute of Ophthalmology & Moorfields Charity c/o agent	Jones Lang LaSalle Limited 30 Warwick Street London W1B 5NH

ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace (GIA sqm)
Existing (application site)	Class E (Commercial, business and services) (e): Provision of medical or health service		6009
	TOTAL		6009sqm

Existing Moorfields EH site (LB Islington)*	<i>Class E (Commercial, business and services) (e): Provision of medical or health service (g) (ii) Research and development of products or processes</i>	55,409*
	TOTAL	55,409sqm
Proposed (application site)	Composite mix (sui generis) within a single planning unit comprised of the following:	47,144
	<i>Class E (Commercial, business and services) (e): Provision of medical or health service (g) (ii) Research and development of products or processes</i>	27,988 (19,938 + 8050)
	<i>Class E (Commercial, business and services) (a) Display or retail sale of goods (b) Sale of food and drink for consumption (mostly) on the premises</i>	303
	<i>Class F1 (Learning and non-residential institutions) (a): Provision of education</i>	1980
	Ancillary plant, circulation, cores and public areas	16,873
	TOTAL	47,144sqm

**Figures include all facility buildings that currently host MEH and the UCL at the current Islington site including: City Road, Bath Street, Ebenezer Street, Kemp House (MEH) and the Institute of Ophthalmology (UCL). GIA figures are inclusive of ancillary plant, circulation and public areas.*

Vehicular Parking Details:		
	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	0	0
Proposed	0	3
Cycle parking details:		
	Short stay	Long stay
Existing	0	0
Proposed	112	407

OFFICERS' REPORT

Reason for Referral to Committee:

Major development involving the construction of more than 1000 sq. metres of non-residential floorspace [clause 3(i)]; and which is subject to the completion of a Section 106 legal agreement for matters which the Director of Economy, Regeneration and Investment does not have delegated authority [clause 3(iv)]

Referral to the Mayor

The application includes development which comprises the erection of buildings in Central London with a total floorspace of more than 20,000sqm (Category 1B(b)) and a building which is more than 30m high and outside the City of London (Category 1C(c)), and is therefore considered a 'strategic' application under the Mayor of London Order 2008. The application is thereby referable for Mayor's direction, whereby the Mayor has power to direct the local authority to refuse the application or call the application in for determination.

Environmental Impact Assessment (EIA)

A screening opinion was provided by the Council whereby it was determined that development did not constitute an EIA development under the EIA Regulations 2017 (as amended). An EIA is therefore not applicable to the development.

1 STRATEGIC CONTEXT - NHS Service transformation

Moorfields and the Institute of Ophthalmology

- 1.1 The applicants for this application are Moorfields Eye Hospital NHS Foundation Trust, University College London Institute of Ophthalmology and Moorfields Eye Charity. In this instance, the applicants would be the end users of the development and the scheme has been designed to suit their specialist requirements.
- 1.2 These institutions are regarded as world leaders in the study, research and development and provision of ophthalmology. The existing Moorfields Eye Hospital (MEH) at City Road, Islington (the 'City Road' site) currently provides comprehensive general and specialist outpatient, diagnostic and surgical services for people who require more specialist treatment. It also provides emergency surgery, a 24-hour Accident and Emergency ('A&E') dealing exclusively with urgent eye problems (i.e. with no 'blue light' ambulances), and research and education capability. In addition, the site includes the Richard Desmond Children's Eye Centre, the world's largest specialist children's eye hospital. Moorfields' research partners, the UCL London Institute of Ophthalmology (IoO) which is also based at the site is a world-class centre of excellence in biomedical science and is internationally recognised for its strength within the field of biomedical research
- 1.3 The existing City Road site is comprised of a number of linked and relatively small-scale historic buildings, some being over 100 years old. The aging facilities at City Road are no longer fit for purpose, do not meet modern standards and maximise opportunities to deliver excellent science, 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. Consequently, MEH and IoO seek to sell the existing City Road site in order to reinvest the capital receipt into the development of the proposed purpose built facility which they term project 'Oriel' (from window/light).
- 1.4 Moorfields' vision for the 'Oriel' is to create an environment for innovation to flourish, inspiring improvements in people's sight. It will be a modern facility, remaining flexible for changing needs. With a focused on patients, it will attract and retain the best ophthalmic scientists, educators and clinicians. It will house the three partners, brought together in one flexible, fully integrated development

Camden and Islington NHS Foundation Trust

- 1.5 The whole of the St Pancras Hospital site is owned and managed by the Camden and Islington NHS Foundation Trust (C&I), who operate a range of services from the buildings onsite as well as renting out spaces to other NHS providers.
- 1.6 C&I have themselves been implementing a major overhaul of their portfolio of facilities to improve the standard of care on offer. This includes plans for a new purpose built mental health facility in Highgate and at the Whittington Hospital, as well as upgrades to a number of existing facilities, mostly in Camden. In order to

be able to make this investment, C&I will firstly sell a portion of their site to MEH to generate a capital receipt that will kick start this transformation process. In addition, C&I are considering redevelopment of the remainder of the St Pancras Hospital site and have secured approval from the treasury / Department of Health to tender for a development partner. Following a competitive tendering process, King's Cross Central Limited Partnership (KCCLP) were selected to undertake and oversee development of the remainder of the site, however, C&I will remain a flagship presence on the site and will retain its freehold. The Trust is planning to move its existing inpatient services from St Pancras to a site behind the Whittington Hospital but retain other clinics, offices and research facilities at St Pancras as part of the future redevelopment. Revenue from the site, will allow C&I to reinvest the money in new clinical and healthcare facilities and to modernise its portfolio of existing facilities across Camden and Islington.

Key Glossary of terms using this this report

1.7 Throughout the following report, the following key terms will be used:

- The 'Oriel' (or project Oriel) – the name of the new facility hereby proposed used by the applicants in their public communications
- The Oriel partners – the applicants for this submission and end users of the proposed development, including Moorfields Eye hospital (MEH), Moorfields charity (MC) and the UCL Institute of Ophthalmology (IoO)
- C&I – Camden & Islington NHS Foundation Trust (also known as CANDI), current freeholders of the entire St Pancras hospital who have separate ambitions to bring forward a future scheme of redevelopment for the remainder of the site.
- KCCLP – Kings Cross Central Limited Partnership (also known as Argent) were recently appointed as development partners by C&I. They will be responsible for the development of a masterplan for the wider hospital site alongside C&I to realise their longer term ambitions. KCCLP were responsible for the major redevelopment of Kings Cross central.
- North London Health Partners - partnership of local authorities and health and care organisations from Barnet, Camden, Enfield, Haringey and Islington.

1.8 Acronyms for other key terms that relate to specific sections of the assessment will be set out within main report.

2 EXECUTIVE SUMMARY

- 2.1 MEH and UCL's IoO provide healthcare and research capability of strategic importance both to London and nationally. Their current facilities at City Road are no longer fit for purpose and this is affecting the quality of care as well as hampering the progression of new research and teaching to further understanding and treatment to tackle diseases of the eye. Similarly, the existing C&I facilities on the existing site are also dated, with constrained areas and facilities and so they too have made long term and public commitments to re-providing these with modern, fit for purpose facilities.
- 2.2 The proposal is a major step in the implementation of joint NHS Service Transformation Plan prepared by the North Central London Health Providers. Moorfields would pay for it via the release of surplus land at the City Road site. It would also generate funds for C&I to pay for new and enhanced facilities across their portfolio, including a brand new mental health ward in Highgate and the Whittington. As well as providing a new, purpose built facility for the study, research and provision of eye care for London, the works would therefore also facilitate major investment in facilities for mental health provision.
- 2.3 Subject to securing commitments made by both the Oriel partners and C&I to avoid any break in service provision, the development would not result in any loss of social infrastructure, community or health facilities. Rather, the development would facilitate a major investment in eye care and mental health provision in line with a strategic plan. The proposal, representing a major investment in health care and research provision would deliver a new, modern facility that will significantly improve the offer for patients as well as allowing for much greater collaboration between eye research, education and healthcare. As such the provision of a purpose built facility to support these specialist functions is strongly supported in strategic planning terms.
- 2.4 The impacts resulting from the construction phase would be very carefully managed and controlled via obligations within the legal agreement for construction and demolition management plans, to be prepared in consultation with groups representing the St Pancras hospital users as well as a wider community working group.
- 2.5 There is support within the adopted development plan for the redevelopment of the site via its inclusion within the current and emerging Site Allocations Local Plan. The site policy would support the uses proposed and the development would further the historic legacy of health provision on the site, advancing the significance of the knowledge quarter for the Borough's economy. Weight is afforded to the lack of housing provision in the scheme. However, given the evidence to show that development potential of the wider site is not impeded [including for housing] and the incompatibility for an onsite mix as part of this scheme, this is accepted in this instance.

- 2.6 The proposal is considered to represent a high quality, contextual design that responds to the site's characteristics, the surrounding pattern of development as well as the future use of the building itself. Its layout and the locations of entrance and servicing areas have been robustly considered and are in the most appropriate locations. They also respond to pedestrian desire lines, joining up a network of routes that would transform the permeability of the site and wider area. The massing and heights have been shaped to respond to the local context, stepping down to the south to present a more neighbourly relationship with the key heritage workhouse buildings and stepping up to the north to denote key corners and response to the new developments at the Travis Perkins, UBB and Camley Street developments. This massing has been articulated further through sensitive detailing and treatments that would be robust, add interest and character, and reflect the use of the building. The development would also contribute c.2000sqm of new public realm, a roof garden, public routes and generate biodiversity net-gains, despite the need to replace trees.
- 2.7 Notwithstanding the high quality, contextual design response, officers still consider the development to cause less than substantial harm to the special character and appearance of the Kings Cross St Pancras conservation area. This is due to the loss of three buildings or structures that are regarded as making a positive contribution to the conservation area; the erosion of the integrity of the St Pancras Hospital as a whole as well as the scale of the new building in relation to the retained Victorian workhouse buildings. No other heritage asset would experience harm to their significance or special character and appearance. Weighing the public benefits of the proposals against the duty imposed by the Listed Building Act to give considerable importance and weight to avoiding harm to designated assets, officers recommend that the package of benefits which would accompany the proposed development would be sufficient to outweigh the harm.
- 2.8 The scheme would include an onsite patient drop off area that will be sufficient to accommodate predicted numbers of vehicles. It would also incorporate an onsite deliveries bay which has been designed to accommodate all of the operational requirements of the building, other than bi-annual oil deliveries which would be controlled as part of the servicing management plan. The development would include a policy compliance provision of short and long stay cycle spaces and through capital contributions, would also facilitate major enhancements to the pedestrian, environmental and cycling quality of the area. In addition, active and public transport routes to the site would be enhanced to ensure predicted mode splits are borne out. Discussions regarding options for enhanced bus services and specialist wayfinding signage remain the subject of discussions with TfL, who are supportive of the proposals but wish to use further trials and user research prior to implementing a final solution. In addition, the scheme would also provide a contribution towards the delivery cost of a new canal bridge, which is seen to be of strategic importance.
- 2.9 Despite its large scale, through the siting and positioning of heights and massing the development would minimise its impacts to the amenity of neighbouring occupiers and the area. Some adverse loss of light and outlook

would, however, be experienced at properties directly opposite the development site to the western side of St Pancras Way, including self contained dwelling (7/7a) as well as the non-self contained housing uses at no.9 (hostel) and no.11-13 (student housing at upper floors). These impacts are given weight in the overall planning balance.

- 2.10 Following robust testing, the development was not found to cause environmental impacts of more than localised impacts. These impacts would be mitigated against via the application of conditions and requirements within the legal agreement for a range of measure relating to the construction and end use of the facility. The mitigation secured would ensure that the development would not result in environmental impacts that would cause detrimental harm and to ensure compliance with the development plan.
- 2.11 The development would be highly sustainable in its design, construction and operation. Notwithstanding, in order to meet the expectations of the energy hierarchy an off-setting contribution would be required. This is primarily as a result of the intense energy requirements of the building due to the commitments for it to remain fully electric and its specialist, clinical and research use. After robust testing, officers accept that the scheme has maximised opportunities for carbon savings and so this offsetting contribution is accepted to ensure a policy compliant scheme. The issues raised by the Mayor in the Greater London Authority's (GLA) and TfL's Stage 1 letter have been addressed through further clarifications and measures which would be secured by s106 legal agreement or by condition. This includes the provision of a whole life carbon assessment.
- 2.12 When considering the overall planning balance of the assessment (further to the conclusions of the heritage balance exercise), subject to the recommended conditions and obligations the harm identified would be convincingly outweighed by the public benefits delivered. Officers therefore recommend that conditional planning permission is granted, subject to a legal agreements.

3 STRUCTURE OF REPORT

3.1 The following report will be broken down as follows. Page numbers and quick link (if reading in digital format) are provided below.

Section No.	Section title	Pages
4	<u>SITE DESCRIPTION</u>	
5	<u>PROPOSAL</u>	
6	<u>PLANNING HISTORY</u>	
7	<u>CONSULTATION SUMMARY</u>	
8	<u>STATUTORY PROVISIONS</u>	
9	<u>POLICIES AND GUIDANCE</u>	
10	<u>ASSESSMENT:</u>	
11	<u>Land use and principle of development</u>	
12	<u>Strategic implications for health care provision and local health and wellbeing</u>	
13	<u>Design, Character and Appearance, Impact on Heritage Assets</u>	
14	<u>Open space, Landscaping, Trees, Nature and Biodiversity</u>	
15	<u>Accessibility</u>	
16	<u>Impacts to neighbouring amenity</u>	
17	<u>Transport and highways</u>	
18	<u>Canal bridge</u>	
19	<u>Land contamination</u>	
20	<u>Basement impacts</u>	
21	<u>Air quality</u>	
22	<u>Sustainable design and construction</u>	
23	<u>Flood risk and drainage</u>	
24	<u>Safety and security</u>	
25	<u>Waste management</u>	
26	<u>Economic Benefits, Local Employment and Procurement</u>	
27	<u>Fire safety</u>	
28	<u>Equality</u>	
29	<u>PLANNING OBLIGATIONS</u>	
30	<u>Community Infrastructure Levy (CIL)</u>	
31	<u>PLANNING BALANCE</u>	
32	<u>CONCLUSIONS</u>	
33	<u>RECOMMENDATIONS</u>	
34	<u>Legal comment</u>	
35	<u>CONDITIONS</u>	
36	<u>INFORMATIVES</u>	

3.2 Legal comments are also found at the end of the report.

4 SITE

- 4.1 The application site covers an area of approximately 1 hectare (9,800sqm) at the north western corner of the St Pancras Hospital site, located within the St Pancras ward of the Borough. The submitted red line plan also include areas of the surrounding streets of St Pancras Way and Granary Street and internal servicing road, where improvement works are also planned.
- 4.2 The development site is currently host to a collection of 7 buildings of between one and two storeys in height (plus basements) comprising approximately 6000sqm of medical and healthcare provision (Use Class E(e)). The remainder of the St Pancras Hospital site outside of the red line boundary would not be included within the proposed development. This contains a mix of buildings ranging between single and 6 storeys, also used for health care purposes.

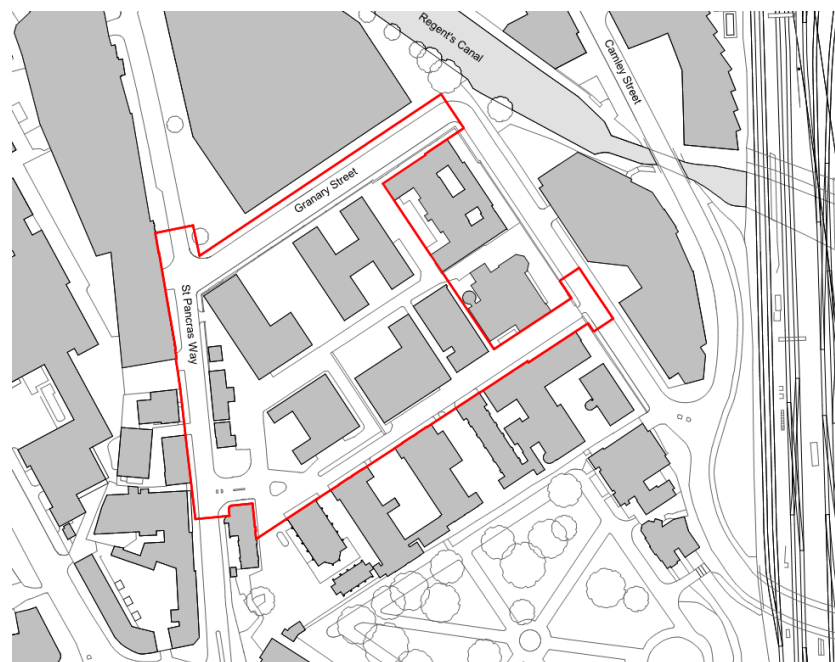


Figure 1 – Site location plan extract with development site boundary shown in red

- 4.3 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.
- 4.4 The application and wider St Pancras Hospital site are located within the Kings Cross / St Pancras conservation area. There are no listed buildings within the site and Certificates of Immunity from Listing (COIL) were issued by Historic England (HE) for all of the building across the St Pancras Hospital in 2015. These expired in 2020, but in their response HE have not recommended that a fresh assessment is required. Notwithstanding, the adopted conservation area statement notes that a number of buildings within the development site and wider St Pancras Hospital site as well as its perimeter wall make a positive contribution to the Conservation Area. The positive contributors that are of the

greatest significance are generally located outside of the development site and within the wider hospital. The development site is also noted to contain buildings that make a neutral, or negative contribution. The site is also close to the boundary of the Regents Canal conservation area which lies c.60m to the east of the site.

- 4.5 Immediately to the South of the hospital site lies the St Pancras Gardens (GII registered park/garden HE ref. 1001689) and St Pancras Old Church (GII* listed HE ref. 1113246). These gardens are also designated as public open space. In addition, the GII listed St Pancras Coroner's Court lies to the south of the site, on the eastern side of the gardens abutting Granary Street. There is one mature tree protected by a tree preservation order within the site itself, located on the western boundary near the vehicular entrance (ref. C402 2003).
- 4.6 In addition, the site falls outside of, but within the vicinity of:
- A Habitat Corridor (the Regents Canal);
 - Open Spaces (the Regents Canal, Goldington Crescent gardens and St Pancras gardens);
 - Site of Importance for Nature Conservation (SINC - St Pancras Gardens); and
 - An archaeological priority area (St Pancras gardens)
- 4.7 The application site is highly accessible via public transport, with a PTAL score of 6b (highest). It is located within walking distance to several major national rail or London underground stations including:
- St Pancras, National Rail (750m / 9min walk)
 - Kings Cross, National Rail (950m / 12mins)
 - Euston, National Rail (1.3km / 17mins)
 - Mornington Crescent, underground (850m / 11mins)
 - Camden Road, overground (1km / 12mins)
- 4.8 The site is also well serviced by bus routes, with stops for the no.46 (St Bartholomew's Hospital to Paddington Station) and 214 (Highgate school to Finsbury Square) within 250m of the site
- 4.9 Located on the edge of London's central activities zone in close proximity to Kings Cross and St Pancras station, over recent years the area surrounding Camley Street and St Pancras Way has been dramatically transformed with the redevelopment of King's Cross Central, the emergence of the Knowledge Quarter and the strengthened role of Camden Town as a major destination. Whilst the area sits in a wider area of major transformation, it currently feels divorced from it.
- 4.10 The surrounding context is one that is experiencing a great degree of change. Major residential developments at 101, 102 and 103 Camley Street and the Unite/ Travis Perkins student accommodation developments have now completed and construction works have now begun at the site known as Ugly Brown building to the north of Granary Street. This will provide a major mixed use scheme involving 6 new buildings providing a hotel, offices as well as residential. These schemes range between 7 and 13 storeys in height.

4.11 The St Pancras Hospital site is included with the adopted Site Allocations plan (2013) as well as consultation version of the emerging draft (2020). The site is also within the framework area of a draft Supplementary Planning Document (SPD) Camley Street to Canal Side (2020). Across the adopted and emerging development plan, this site and the wider Camley Street area is regarded as a spatial area of regeneration focus. These policies all seek redevelopment to maximise its potential to integrate the area with the wider surrounding areas of change, whilst helping it become a more attractive and recognisable place in its own right – and a more successful neighbourhood and place for living and working. The St Pancras Hospital site will have a strong role to play in contributing to improvements in the area and accordingly is covered by three policies within the emerging site allocation plan, including the Camley St area (CSP1), site specific (CSP5) as well as the Knowledge Quarter policy (KQ1).

5 THE PROPOSAL

- 5.1 Planning permission is sought for the demolition of all buildings within the application site, and their replacement with a single building ranging between 7 and 10 storeys in height. Due to the clinical nature of the use, each storey would have floor to floor heights of 4.2m, meaning the maximum height would be 69.15m AOD. The proposed building would provide a total internal area of approximately 47,144sqm (GIA) to include a composite mix of medical/health care, clinical research, education and ancillary plant, facilities management and office space as well as retail and café uses.
- 5.2 The proposed building would feature a footprint of approximately 6,200sqm comprised of two interlinking wings and a central atrium space. Massing has been adjusted to have a taller element to the north (10 storeys) and a lower element to its south (7 storeys), which would feature a large roof garden for staff and students. The specialist nature of the building necessitates a very significant requirement for plant equipment, both to facilitate the clinical and surgery spaces and lab research, but also to provide low carbon methods of heating, cooling and electricity production. This has been disseminated across the building at basement, a dedicated 'interstitial' plant level at sixth floor as well as additional plant on the roof set back behind recessed screening.



Figure 2 – Axonometric and ground level views of the proposed development

- 5.3 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. This would require some areas of stopping up of the existing public footway to St Pancras Way, whilst in other areas pavements would become wider and their quality enhanced.

Revisions

- 5.4 Prior to submission, the applicants undertook detailed pre-application advice from the council over the course of over 12 months. This included meetings with key stakeholders and consultees such as TfL and the GLA. This pre-app led to major changes to the scheme, including reductions in the areas and heights proposed as well as agreeing parameters for various technical aspects of the assessment. This also included several meetings with C&I and their development partners to consider implications for the wider hospital site. Numerous site visits around the affected areas completed alongside planning, conservation, urban design and landscape officers also informed the assessment of the proposed works.
- 5.5 Notwithstanding the detailed advice issued prior to submission, further minor revisions were sought the address officer concerns. These can be summarised as follows
- Alterations were made to the building:
 - Greater articulation to massing, with new setbacks introduced to the upper levels along Granary Street and St Pancras Way;
 - Design development of the façade treatment to the middle and crown levels, adding further depth and variation to fins and adjustments to the tones to increase differentiation;

- Design development of the base level façade treatment, with new windows and artwork added to Granary Street and further detailing added to canopy walk ways;
 - Design development of public realm and landscaping proposals to provide greater clarity and specifications of material types and species to be used;
 - Design development of cycle parking provision, both inside the building and within the public realm; and
 - Amendments to the undercroft areas to design out areas for poor surveillance by minimising retaining walls. Secure gates were also added to provide safety for staff members accessing the cycle store;
- Technical reporting was also updated throughout the course of the application to ensure clarity and compliance with policy requirement with regard to the assessment of:
 - Provision of further clarifications with regard to the site decant strategy and wider transformation plans
 - Transport assessment further detailed assessments feasibility studies provided in response to comments by officers and TfL;
 - Feasibility studies provided in relating to last half mile and green line enhancements;
 - Basement Impacts to satisfied the queries raised during the audit process;
 - Clarifications and feasibility studies to inform the energy and sustainability strategies;
 - Further clarifications within the flood risk assessment modelling;
 - Additional testing provided within an updated daylight assessment;
 - Additional testing provided within an views assessment;
 - In addition, further studies and clarifications with regard to:
 - Air quality;
 - Security;
 - Trees;
 - Biodiversity; and
 - Management of construction impacts.

5.6 The revisions made t did not materially affect the scheme and as such were accepted as amendments under the ongoing application.

6 RELEVANT HISTORY

The development site

6.1 Whilst there are numerous historic applications for minor alterations to the existing buildings within the development site, these are not of relevance to this assessment.

Adjacent sites

- 6.2 **'Ugly Brown Building – (UBB)' 2 - 6 St Pancras Way London NW1 0TB:** Planning permission (ref.2017/5497/P) was granted subject to s106 legal agreement on the 17/03/2020 for the: *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.* This permission is being implemented at the time of writing.
- 6.3 **101 Camley Street, London NW1 0PF:** Planning permission (ref. 2014/4385/P and subsequent MMA - 2018/3682/P) was granted subject to s106 legal agreement for the: *Demolition of existing building and redevelopment for a mixed-use building ranging from 6 -13 storeys comprising 2,220sqm employment floorspace (Class B1), 121 residential flats, the provision of a pedestrian footbridge with disabled access over the Regent's Canal, and associated landscaping and other works relating to the public realm.* This permission is being implemented and is nearing completion, at the time of writing.
- 6.4 **Unite Students accommodation / Travis Perkins, 11-13 St Pancras Way London NW1 0PT:** Planning permission (ref. 2011/1586/P) was granted subject to s106 legal agreement for the: *Erection of part 6, 7, 8 and 10 storey building comprising 3,877 sqm builders merchant (Class Sui Generis) at ground and part mezzanine level and 563 student bedspaces (Class Sui Generis) with ancillary student facilities to the upper floors.* This development has been fully built out.

Wider local area

- 6.5 **102 Camley Street London NW1 0PF:** Planning permission (ref. 2014/4381/P) was granted subject to s106 legal agreement for the: *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.* This development has been fully built out.
- 6.6 **103 Camley Street London NW1 0PF:** Planning permission (ref. 2011/5695/P) was granted subject to s106 legal agreement for the: *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..* This development has been fully built out.
- 6.7 **70-86 Royal College Street London NW1 0TH:** Planning permission (ref. 2020/0728/P) was granted subject to s106 legal agreement for the: *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).. At the time of writing, this permission had not been implemented.

- 6.8 **7 St Pancras Way, NW1 0PB:** Planning permission (ref. 2013/2377/P) was granted subject to s106 legal agreement for the: *Change of use of front building from office and live work to office and residential, and rear building to residential, with associated alterations and extensions.* This development has been built out.
- 6.9 **1-5 St Pancras Way, NW1 0PB:** Planning permission (ref. 2008/4425/P) was granted subject to s106 legal agreement for the: *Redevelopment involving the demolition of existing warehouse buildings to provide a new 4-6 storey building comprising 44 residential flats (23 x 1bed, 19 x 2bed, 2 x 3bed) and 170 sqm B1 employment use.* This development has been fully built out.
- 6.10 **Goldington Buildings, Royal College Street, London, NW1 0PA:** Planning permission (ref. 2009/5741/P) was granted subject to s106 legal agreement for the: *Alterations and conversion of 56 residential (social housing) flats on ground, first, second, third, fourth and fifth floor levels to 30 residential (social housing) flats (2 x 1 bed, 7 x 2 bed, 20 x 3 bed and 1 x 4 bed) including replacement of existing windows.* This development has been fully built out.

7 CONSULTATION SUMMARY

- 7.1 Ten site notices were displayed within the vicinity of the site from 13th November 2020 inviting comments until 7th December 2020. A local press advert was placed on 19th November 2020 inviting comments until 7th December 2020.

Statutory consultees

- 7.2 **Greater London Authority – Stage 1 feedback:** An initial, stage 1 letter was received from the GLA based upon the submission scheme on the 25 January 2021. A summary this letter is set out below:
- Overall conclusion: The proposal is strongly supported in principle and would provide strategically important social infrastructure for London. London Plan policies on social infrastructure, economic development, employment and training, heritage, urban design, inclusive access, transport and sustainable development are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:
 - Principle of development: It is noted that MEH and IoO provide healthcare and research capabilities that are of strategic importance, both to London and nationally, and that existing facilities at City Road are no longer fit for purpose. It is accepted that a wholly non-residential scheme is appropriate in this

instance. The proposal to provide a new facility is supported, subject to further clarifications with regard to the relocation of existing services from within the site. Furthermore, this support would also be subject to ensuring no break in service provision via retaining all services at the City Road site until the new development is complete.

- Heritage and urban design: Whilst the site's large footprint represents a departure from the historic pattern of development, the general footprint, scale, massing and height of the proposal is considered appropriate given the existing and emerging site context. The scheme has evolved positively through the pre-application and design review process ensuring active frontages are maintained to the south, east and west, and providing enhanced public realm that successfully integrates with emerging development on the St Pancras Hospital site and pedestrian desire lines of proposed routes and spaces. The design and architectural quality of the building is of high quality. However, concern was raised with regard to the ground floor frontage to the north (Granary Street) and the hostile effect of the louvres proposed here. GLA officers concur with Historic England that there would be less than substantial harm caused to the significance of the King's Cross St. Pancras Conservation Area. They also did not conclude that the development would result in harm to the setting of nearby listed structures or gardens.
- Sustainable development: General approach and response to policy requirements welcomed, however, further information was requested including on: additional measures for carbon reductions; consideration of heat networks; maximisation of on-site savings from renewables; whole life carbon assessment; and circular carbon assessment. These should all be further explored prior to agreeing the final figure for off-set payments to the borough, which should be secured via a Section 106 agreement.
- Transport: The proposals broadly meet Publication London Plan policy aims, however further information on cycle storage design, aspects of servicing and proposals to aid patients' accessibility to the site from major stations are required before the scheme can be considered to satisfactorily mitigate its highways and transport impacts (see related TfL comments below).

Second consultation

Following receipt of this letter, further revisions and updated to technical reporting were negotiated and submitted as outlined in the revisions section. Following a further review, an email received in April 2021 showed support for the design and public realm amendments and energy assessment. It also noted that obligations for managing site decant and service continuation were welcomed and would help to address initial concerns.

Officer Comment

Full discussion of these points are set out within the main body of the assessment, but officers feel that the revisions and clarifications provided by the applicants during the course of the assessment are now sufficient to adequately close out the above and allow for a positive determination. Should a resolution to grant be made in line with officer recommendations, this will be

sent through to the Mayor as part of their stage 2 review prior to a final determination as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

7.3 Transport for London (TfL): An initial, letter was received from TfL based upon the submission scheme on the 2 February 2021. A summary this letter is set out below:

- Overall comments: Proposals broadly meet LP policy aims, however further information on cycle storage design, minor aspects of servicing and proposals to aid patients' accessibility to the site are required;
- Walking and cycling analysis in line with the healthy streets criteria is welcomed, as is the creation of new pedestrian route through the site, though drinking water fountains should be provided alongside further details of cycle routes. Pavements suitably wide. Unimpeded pedestrian access to the public routes should be secured. A contribution towards future cycling infrastructure on St Pancras Way should also be secured as well as for the raised table and zebra crossing.
- Last half mile: Measures set out in report will require further engagement with TfL to test and refine. Reporting notes that an accessible shuttle bus may be required to ensure that the high proportion of rail journeys do not end with taxi trips from local stations.
- Parking, Drop off bay, servicing and deliveries The car-free nature of the scheme (other than onsite disabled bays) is welcomed. The number and approach for disabled parking provision is supported. Design of drop off area seems adequate. The dedicated deliveries bay has been carefully designed and the outline delivery and servicing management plan includes effective management arrangements
- Cycle parking The number of spaces (519) remains in line with the requirements of the London Plan, though further clarification of the specification and split between types is requested
- Construction and travel planning The draft construction management plan (CMP) is welcomed, though exploration of the use of the Regents Canal for transporting construction waste and materials should be explored.. The Travel Plan (TP) has been acceptably produced and should be secured and monitored.

Following receipt of this letter, further revisions and updated to technical reporting were negotiated and submitted as outlined in the revisions section. In addition, officers arranged for meetings with TfL officers and the applicants. Following a further review, a second letter was received in April 2021. Updated comments are summarised below:

- Overall summary: TfL remains supportive of the proposal and the approach taken, however, further work is required prior to determination. Key outstanding areas include:
- Cycle parking –Clarification against Camden’s uplift figures, showers, changing areas and lockers still needed;
- ‘Green line’ –The green line and signage proposals from Kings Cross is accepted, though further exploration needed and relevant contributions should be secured under the S106. The proposals to upgrade four junctions to signalised crossing may have impacts on traffic flows and bus reliability in this busy area and further analysis and engagement with TfL is required if this is to be proposed.
- ‘Last half mile’: Updated evidence is welcomed, but further testing and information is still required to determine the optimal solution for the ‘alternative transport solution’, in particular options for buses.
- Drop off and parking– Approach for blue badge (BB) holder parking supported, though further occupancy surveys of on-street parking should be provided to fully appreciate the availability of on-street parking for BB holders.

Officers comment

Further meetings have already been held since this point between TfL and the applicants, with several more scheduled over coming months to further refine and test these outstanding points. Further discussion is set out in the accessibility and transport sections of the report.

A further letter was received on the 09th June to confirm and clarify their position in advance of the committee meeting. Their updated comments can be summarised as follows:

- TfL remain supportive of the application in principle, but wish to make a number of clarifications and highlight the outstanding elements where further negotiation is required, which they remain committed to continued working with the applicants and the Council to resolve;
- Notes that reference to wayfinding enhancements in the report (under ‘Legible London’) is too proscriptive as a number of other innovative solutions to work in tandem with signage (which could also be possible bespoke) are also being considered. This could include technology that pairs with smart phones for example. The capital contributions for wayfinding improvements remains vague in the committee report as this is still under negotiation, where testing of multiple options will be sought prior to agreeing the most optimal solution;
- Note that the potential additional bus stops referenced in para.17.27 & 17.28 of the report is yet to be fully tested and resolved and TfL cannot endorse this as a solution. TfL remain concerned that new stops on Crowndale road could

in fact result in disbenefits for journey times / bus reliability and this is yet to be fully tested. It is therefore not the case this would be TfL's preferred solution;

- Another option for bus mitigation not specifically mentioned in the report but that remains under discussion with the applicants, TfL and the Council is the potential for new stops to be delivered at Battle Bridge (adjacent to St Pancras/Kings X) to provide a stop in closer proximity to the stations. Subject to further testing and road safety audit it should be noted that this remains an option still being discussed/tested;
- To confirm that, in the event that none of the above solutions for amendment/adjustment to TfL bus services remain viable it would remain TfL's position that the applicants should be expected to provide an accessible, convenient and 'free' patient/visitor transport service (registered blind people are eligible for a Freedom pass and staff assistance); and
- Notes that the scale of capital contributions are a material factor. Whilst appreciating that the funding requirements for Moorfields necessitate a planning decision at this stage, this does mean that the report must be somewhat open-ended at this stage in terms of payments for things like way finding as some of the proposed solutions are innovative in their approach and require feasibility testing –something the decision makers should be made aware of. TfL also requests a review of the specific wording of the s106 once these obligations are drafted.

Officers' response:

The above clarifications and confirmations are welcomed, as is the constructive approach taken by TfL in negotiations to date. Officers remain supportive of the suggestion to test innovative wayfinding solutions to work in conjunction with signage and look forward to helping with the design and delivery of these elements. Furthermore, the clarifications regarding the options under consideration for the bus mitigation are welcomed and the suggestions remain in accordance with the draft obligations to be included within the S106. This would include a fall back that a private service would be necessary should the other options for existing TfL services be shown to remain unfeasible.

- 7.4 **London Underground (TfL):** A response was received in December 2020 confirming that the development would not pose any implications for matters of railway engineering and safety and that therefore they had no comment to make on this application.
- 7.5 **Cross Rail (TfL):** A response was received in December 2020 confirming that the site would remain outside of the safeguarding area and that therefore Crossrail had no comment to make on this application.

7.6 **Thames Water:** An initial response was received based upon the submission scheme in February 2021. A summary this letter is set out below:

- Surface water: No objection with regard to surface water network infrastructure capacity
- Water infrastructure: As full details of the water and waste water infrastructure needs have not been provided at this stage, conditions are required for the agreement and phasing of any necessary infrastructure with Thames Water. Informatives providing further guidance are also to be attached.

7.7 **National Rail:** Following a request for comment on the submitted application, no response was received.

7.8 **Environment Agency:** Following a request for comment on the submitted application, no response was received.

7.9 **London Fire Brigade:** No detailed comments were offered on the proposal. Formal consultation would be required under the Building Regulations procedure.

7.10 **National Grid:** Following a request for comment on the submitted application, no response was received.

7.11 **Canal & Rivers Trust:** An initial response was received from the Trust based upon the submission scheme in December 2020. A summary this letter is set out below:

- Overshadowing: Further clarification with regards to the impact to natural light conditions the Regent's Canal is requested to understand impact to permanent moorings and habitat corridor.
- Wayfinding: Proposals should promote connections to the canal through wayfinding from the site via a contribution towards Legible London signage (ideally highway level and tow path level).
- Other comments: Given that the site is set back from the canal, and in the context of the adjacent consented developments, we have no other comments on the proposal.

Following the submission of further technical reporting, including an updated daylight assessment with details of implications for the light conditions along the canal, a further response was received in March 2021:

- No further comment required on the basis of the additional clarifications and reporting provided, though the prior request for signage was maintained.

7.12 **Natural England (NE):** A response to the consultation request was received in November 2020. This response confirmed that NE had no comments to make on the application and that the assessment on the impacts on nearby assets should be determined in line with local policy requirements.

7.13 **Historic England (HE):** An initial letter was received from HE based upon the submission scheme in December 2020. A summary this letter is set out below:

- Overall summary: The development will result in less than substantial harm to the Kings Cross St Pancras conservation area. Although HE recognises the development potential of the site and support retention of health uses, further efforts to minimise this impact should be explored. Once this has been minimised as far as possible, it would fall upon the LPA to determine a balancing exercise in accordance with the NPPF. Winter views analysis should also be provided.
- Site's significance within the conservation area: All of the buildings which form part of the St Pancras Hospital complex were issued with a Certificate of Immunity (from listing) in 2015 which recently expired. The hospital site includes a surviving, relatively coherent group of Victorian buildings that play a significant role in defining the character and appearance of this part of the sub area of the conservation area. The more modern twentieth century buildings make a neutral contribution.
- Impacts of proposals: The development would lead to the loss of buildings which are considered to make a positive contribution to the conservation area and replacement with a much larger building. The principal impacts will therefore be upon the significance of the conservation area. Further views analysis is required to determine whether the setting of assets within the St Pancras Old Church would impacted.

Further to this letter, additional evidence in the form of an updated heritage and visual impact assessment (including winter) views was provided and officers notified HE. In response a second letter was received, which is summarised below:

- Winter views provided confirm HE's position with regard to the less than substantial harm to the Kings Cross St Pancras conservation area. However, they do not consider there to be demonstrable harm to the gardens themselves (GII) or the setting of heritage assets within it (GII-I).
- Minor changes have been made to the scheme but previous position maintained, content to defer assessment to the Council's design and conservation colleagues.

7.14 **Greater London Archaeological Advisory Service - Historic England (GLAAS):** A consultation response was received from GLAAS on the 23 November 2020. A summary this letter is set out below:

- Archaeology: Although site is not within an archaeological priority area, the historic workhouse use means that burials may have taken place within the application site as well as possible remains of earlier structures. As such, a robust evaluation should be conditioned, and is required prior to commencement of works. The written scheme of investigation (WSI) shall include a programme and methodology for site evaluation, both for human

remains as well as the potential for any surviving remains of earlier workhouse buildings.

- Historic building record: In addition, the proposals would also result in the removal of buildings associated with the late 19th-Century and early 20th century workhouse development phases which are of local significance. This should be mitigated against via securing a programme of Level 3 historic building recording to be carried out on the surviving buildings which predate the 1970s phase of development

7.15 **Victorian Society**: A letter of objection was received in December 2020 following a request for comment. In their letter, they note that whilst the principle of the works were supported, the society objects to proposal on the following grounds:

- The relative completeness of the site, with former workhouse and ancillary buildings are a key feature of the site and development combined with future redevelopment of the wider site will destroy the legibility of this;
- Proposed building is considerably greater than remaining Victorian buildings and would impose upon the site;
- Further efforts to break up massing should be made; and
- Predominant use of glass would appear incongruous to the primarily brick hospital buildings.

7.16 **Camley Street neighbourhood forum**: Following a request for comment on the submitted application, no response was received.

Ophthalmology service provider / charity stakeholder responses

7.17 7 letters support were received following public consultation. The letters of support predominantly come from local community or local/regional/national visual impairment charities. These were provided by the following organisations:

- **Royal Society for Blind Children (RSBC)**
- **The Guide Dogs for the Blind Association UK**
- **London Vision**
- **Visually Impaired in Camden**
- **Thomas Pocklington Trust:**
- **SeeAbility**

7.18 Their comments can be summarised as follows:

- Clinical provision and strategic importance: This new centre will bring major advancement for the treatment and research into childhood sight loss and attract the finest talent in the field. Centre would offer the very best environment for patients and staff. Proposed development will allow Moorfields to continue its world-leading clinical outcomes and attract, inspire and retain the most talented clinicians, researchers and educators.

- **Engagement:** Impressed with the engagement that the team has had with those who would directly benefit from the centre, with young people who also work with RSBC contributing their thoughts on the proposals.
- **Design:** Proposal would create high quality public realm for patients and staff, with active uses at ground floor such as café, retail and education;
- **Other benefits:** Scheme will also signify a major investment for the local economy, provide local training and employment opportunities as well as being a highly sustainable building.

7.19 **Royal National Institute for the Blind (RNIB):** A late stage letter of support was received on behalf of the Royal National Institute of Blind People (RNIB) on the 3rd June 2021. Their comments can be summarised as follows:

- RNIB supports the proposed relocation of MEH and creation of a combined centre for treatment, research and education;
- Confident in the high level of patient engagement carried out by the team, including targeting harder to reach groups;
- Development would align with RNIB's vision to achieve a world without barriers to people with sight loss; and
- Confident that questions about the 'last half mile' from Kings Cross station are being addressed via Green Line and other wayfinding options to enable a smooth journey for patients.

7.20 **West Euston Partnership (WEP):** A letter of support from the director of this community charity based in Camden was received in December 2020. A summary of this response is set out below:

- Centre will provide a high quality facility that will benefit local residents through employment and training opportunities, the expansion of the knowledge quarter as well as creation of new public spaces and routes.

Local amenity groups

7.21 One letter of objection was received from a local amenity group.

7.22 **The Regents Network:** A letter of objection was received on behalf of this local amenity group in December 2020. Their comments state that although there is general support for the principle of development and need to replace City Road facilities, the group maintains serious concerns about the proposal, including:

- **Design:** Development is very large, bulky, unappealing and overly dominant. Object to allocation of the hospital site and the recently adopted SPD that supports high density redevelopment. Massing would harm the setting of the Regents Canal conservation area and the St Pancras heritage site.
- **Local amenity and visual impact:** Overdevelopment and loss of openness and community. Development would also lead the way for other, taller developments of the remaining site.

- 7.23 **Kings Cross / St Pancras Conservation Area Advisory Committee (CAAC):** Following a request for comment on the submitted application, no response was received.
- 7.24 **Regent’s Canal Conservation Area Advisory Committee (CAAC):** Following a request for comment on the submitted application, no response was received.
- 7.25 **Camden Town Conservation Area Advisory Committee (CAAC):** Following a request for comment on the submitted application, no response was received.

Individual responses

<i>Total number of respondents</i>	2
<i>Number in support</i>	0
<i>Number of comment</i>	0
<i>Number of objections</i>	2

7.26 Letters of objection were received from two individuals. No addresses were given by these respondents. A summary of their letters is given below:

- Supportive of the principle of the works, however concern is raised on a number of elements:
- Transport: Transport assessment is too narrow in scope and should be expanded to assess wider impacts to travel patterns to avoid the need for extra navigation or extra taxi trips. Scheme should include more parking;
- ‘Last half mile’: Route is too long to encourage patients to walk to the site. ‘Green line’ could be positive but more details should be provided;
- Crime: Designing out crime statement fails to impacts to visually impaired (VI) women and should be expanded to include the wider area;
- Design and landscaping: Too tall, massing would appear monolithic and cause overshadowing. It would destroy sky-lines and pedestrian views. The façade design is overly repetitive and this may impact of suffers from multiple vision. There is also no temporary seating. The materiality and tones of the development also lack differentiation, challenging for VI patients. Strategy for signage should also be secured with patients in mind. The landscape design does not appear to have been informed by the green line proposals;
- Archaeology: Development is a major opportunity to investigate history of the land. Considers the site likely to possess Roman or Saxon period materials given former GLAAS advise for adjacent developments and age of the Old Church;

- Acoustics and lighting: The central atrium approach is positive in terms of natural light and air penetrations, but can create acoustic issues that make orientation challenging. Similarly, lighting must be carefully specified for the patient experience;
- Engagement: Design seems to have been finalised for planning before any consultation with VI/blind users, leading to the issues highlighted above;

7.27 Following the receipt of revisions to the scheme and reporting, a further letter was received in April 2021. Their updated comments can be summarised as follows:

- Additional clarity in reporting and proposed mitigation is welcomed, however, concern is maintained in relation to the following:
- 'Last half mile': Use of green line solution is supported, however, patients will still travel via the most convenient routes and this may not always be from Kings Cross station. There should also be a strategy that also deals with the other nearby stations as well as the business of the stations themselves. The use of tactile paving should be tested further.
- Transport: Buses should remain a key part of the proposal. The green line should direct people from the stations to the new / specific bus stop
- Engagement: Encouraged to see recent study has included survey data, but testing of any final solution will also be key to making sure that it is actually successful in achieving its stated aims.

Applicants own consultation

7.28 The applicants have been undertaking public engagement on a proposed move from the existing facilities at City Road for a number of years, with the decision for the St Pancras Hospital to be considered as a preferred option being based upon the outcomes of this engagement. More recently, a nation-wide consultation specifically seeking views on proposals to build a purpose built facility on the St Pancras Hospital site ran between May and September 2019. This consultation was ran by NHS Camden Clinical Commissioning Group (CCG) on behalf of all CCGs together with NHS England Specialised Commissioning, which commissions specialised services for the whole of England. The outcome of this consultation was then published and used by commissioners from 14 London and Hertfordshire CCGs, as well as NHS England Specialised Commissioning, to decide whether to proceed with this proposal. This decision was taken by the Clinical Commissioning Group in February 2020.

7.29 Since agreement to proceed was taken, the applicant has engaged, and continues to engage, with a wide range of stakeholders and the community. This includes local residents and businesses, staff and patients of the existing St Pancras and City Road sites, community groups, the Council (various departments within it), the GLA, HE, London Borough of Islington, key political stakeholders, Ward Councillors and special interest groups. Consultation with the public about specific

proposals for the site commenced in early 2020 (at pre-application stage) and has continued through the application phase. In the event permission is granted it would continue through the construction process and life of the development. Full details of the consultation strategy are set out in the Statement of Community Engagement dated October 2020. Prior to the submission of the application, some of the community engagement included (in addition to engagement activities for existing patients and staff members):

- Writing to all residents and businesses within 550m of the site (+6000 homes) with two community newsletters and flyers
- Setting up of a dedicated website with information about the proposals and details of meetings to be held (<https://oriel-london.org.uk>)
- The team set up dedicated email, free phone and chat bot services to provide easy to access information;
- Erecting posters around the local area, as well as sending to local groups such as the Somers Town neighbourhood forum
- Two public meetings were held in August 2020, available to any member of the public, with 40 people attending;
- Advertisements via social media;
- Press adverts to local media and within the Camden New Journal;
- A further eight meetings with specific interest or amenity groups, including local forums

7.30 The Statement of Community Involvement summarises the consultation process, including the key themes that were raised and negotiated. A summary of the concerns raised and a response to each is included. The applicant maintains that the proposals were influenced by the consultation process, with some of the positive outcomes summarised below:

- Proposals for last half mile enhancements;
- Design response, especially with regard to massing, public realm and façade treatment; and
- Initial suggestions for managing impacts of construction within the draft CMP.

Development Management (DM) Forum

7.31 A Development Management (DM) Forum, organised by Council officers, was held on 20/09/2020. Because of coronavirus restrictions, this meeting was held online with members of the public being able to watch presentations via a website and submit questions via the website, phone or video. At the meeting there were members of the public present along with individuals representing local interest groups. The meeting included an overview of the site, an explanation of the emerging plans and a question and answer session. Questions raised and discussed during the session related to:

- Massing and heights;
- Architecture;
- Implications for health provision;
- Sustainable construction; and

- Transport related impacts.

Developer's briefing

7.32 A Developer Briefing, organised by Council officers, was held in November 2020. A summary of the key discussion topics is set out below:

- Welcome the proposed health care and knowledge quarter uses, noting that the development would provide new social infrastructure of strategic importance;
- Consultation approach with staff and patients welcomed;
- Important to fully understand the transport impacts of the scheme;
- Expect to see delivery of enhancements to ensure that walking routes from railway stations are accessible and safe for patients;
- Expect to see the scheme delivering benefits for the local community, including public realm, routes as well as training, education and employment opportunities;
- Important to understand implications for existing services on site; and
- Expect to see a construction working group set up to closely monitor noise and disruption to local community.

Strategic panel

7.33 Emerging proposals were presented to the Strategic Panel in September 2020. The Panel's feedback is summarised below:

- Site is of strategic importance within the Knowledge Quarter (KQ) and has the potential to deliver world class knowledge quarter uses with associated social and economic benefits for the local community;
- It is essential to demonstrate that the design would not prejudice the remainder of the site from being optimized for later development;
- Any development would need to ensure that it contributes to reducing inequalities and increasing life chances in neighbouring communities and the Borough generally;
- Expect the scheme to encourage the use of sustainable modes of transport for both staff and patients. Careful attention will be needed to the journey of users from nearby transport hubs and how this can be enhanced as well as the interaction between vehicles and pedestrians and cycles;
- It will be essential to ensure that the articulation of the form and architectural treatment are designed to sensitively respond to the local context;
- We will expect the building to achieve highly in terms of its sustainability credentials of the scheme; and
- We would expect a contribution from this development towards the cost of delivering a new footbridge, a key piece of infrastructure.

Camden Design Review Panel (DRP)

7.34 The scheme has been to two full Design Review Panels. The first on 24th April 2020 and the second on 21st August 2020.

- 7.35 In response to the feedback received, the scheme was amended considerably between the first and second reviews and was the subject of further refinement following the second review. The second DRP recognised that significant progress had made in addressing concerns raised in the first DRP particularly relating to how the building fits within its context and the position of entrances. However the panel recommended that further refinements of the proposals be made to ensure a 'contextual landmark is created'. The panel remained concerned about the scale of the building but accepted the constraints of the site and the brief require this. In order to address the building's scale the design team were encouraged to use the articulation of the facades to minimise the impact of the proposals, particularly on the corner of Granary St and St Pancras Way. The panel also recommended that less glass than proposed should be used and the materiality of the building should provide a closer correspondence to the site context. Also further work was needed along the Granary St frontage to improve the pedestrians and cyclists experience.
- 7.36 In response the applicant's design team have provided a physical set back at upper levels to all wings to more clearly define the crown element. The architectural design of the upper storeys has also been changed to distinguish the top of the building from the main body of the building .The façade treatment to the middle portion of the building has also been revisited to reduce the extent of reflective surface and soften the rigidity and repetition within the facade design. Warmer colour tones have been provided for the façade treatment that more closely and positively corresponds to those in the surrounding context. On Granary Street additional detailing is added to the ground floor frontage to add interest and appear less hostile for pedestrians and cyclists. Also changes have been made to the entrance canopies to emphasise the separation of the two wings of the building.
- 7.37 Officers are satisfied that the changes that have been made sufficiently address the requirements of the DRP. Further consideration is set out in the design section of the report.

8 STATUTORY PROVISIONS

- 8.1 This planning determination is made in accordance with the relevant provisions from within the Town and Country Planning Act 1990 (as amended); the Town and Country Planning (Use Classes) Order 1987 (as amended); the Planning and Compulsory Purchase Act 2004 (as amended); and the Equality Act 2010.
- 8.2 In making any decisions as part of the planning process, account must be taken of all relevant statutory duties including section 38(6) of the Planning and Compulsory Purchase Act 2004. Section 149 of the Equality Act 2010 is also relevant to the determination of the applications. It sets out the Public Sector Equality Duty, which states that a public authority must have due regard to eliminate discrimination, harassment and victimisation; advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 8.3 When considering the relevant impact upon national heritage assets, the statutory provisions principally relevant to the determination are sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”).
- 8.4 Section 66 of the Act requires that in considering whether to grant planning permission for development which affects the setting of a listed building the local planning authority shall 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.
- 8.5 Section 72(1) requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that Area. The effect of S.72 provides the statutory basis for a presumption in favour of preserving or enhancing the character and appearance of Conservation Areas. Considerable importance and weight should be attached to this presumption. A proposal which would cause harm should only be permitted where there are strong countervailing planning considerations to outweigh the harm. The NPPF provides guidance on the weight that should be accorded to such harm and in what circumstances such harm might be justified.

9 POLICIES & GUIDANCE

- 9.1 The National Planning Policy Framework (NPPF) sets out the government’s planning policies for England and how these are expected to be applied. It must be taken into account in preparing the Development Plan, and is a material consideration in planning decisions. The revised NPPF was published July 2018 and was updated in February 2019.
- 9.2 The Camden Local Plan was adopted by the Council on 3 July 2017. The current Site Allocations Plan (SALP) was adopted in September 2013. The Council is currently reviewing the SALP and completed consultation on a draft between February and March 2020, though this is yet to undergo examination. With formal consultation completed and the draft now under review, the 2020 draft SALP is afforded some weight in this determination. Other local documents which are of relevance include the Policies Map, the Kings Cross & St Pancras Conservation Area Statement (2003), Regent’s Canal Conservation Area Statement (2008) and Camden Planning Guidance (CPG). The emerging Camley Street to Canal Side SPD is also given some weight.
- 9.3 The application site is not within the boundary of any neighbourhood plan area. However, as the boundary to the area for the draft Camley Street Neighbourhood Plan lies just to the east of the site on Granary Street, this is also a material consideration. The 2019 draft plan has now undergone examination, with the inspectors report and recommendations being published in February 2020. The Council has decided to accept all of the Examiner's proposed modifications to the Plan. The Plan is expected to proceed to a local referendum in May 2021, though this had not taken place at the time of writing. The Council will apply significant

weight to policies set out in the 'referendum version' of the Plan, though as noted the development site sits adjacent to, rather than within the plan area.

9.4 In March 2021, the GLA adopted the New London Plan which replacing the former version (2016). This document now represents the Spatial Development Plan for London and part of the statutory Development Plan for Greater London.

9.5 The relevant Camden Local Plan 2017 policies are listed below:

9.6 Camden Local Plan (2017)

- G1 (Delivery and location of growth)
- H1 (Maximising housing supply)
- C1 (Health and wellbeing)
- C2 (Community facilities)
- C5 (Safety and security)
- C6 (Access for all)
- E1 (Economic development)
- E2 (Employment premises and sites)
- A1 (Managing the impact of development)
- A2 (Open space)
- A3 (Biodiversity)
- A4 (Noise and vibration)
- A5 (Basements)
- D1 (Design)
- D2 (Heritage)
- D3 (Shopfronts)
- CC1 (Climate change mitigation)
- CC2 (Adapting to climate change)
- CC3 (Water and flooding)
- CC4 (Air quality)
- CC5 (Waste)
- TC1 (Quantity and location of retail development)
- T1 (Prioritising walking, cycling and public transport)
- T2 (Parking and car-free development)
- T3 Transport infrastructure)
- T4 (Sustainable movement of goods and materials)
- DM1 (Delivery and monitoring)

9.7 Camden Planning guidance

- Access for All CPG - March 2019
- Air Quality - January 2021
- Amenity - January 2021
- Artworks, statues and memorials CPG - March 2019
- Basements - January 2021
- Biodiversity CPG - March 2018
- Community uses, leisure and pubs - January 2021
- Design - January 2021
- Developer Contribution CPG - March 2019

- Employment sites and business premises - January 2021
- Energy efficiency and adaptation - January 2021
- Planning for health and wellbeing - January 2021
- Public open space - January 2021
- Transport - January 2021
- Trees CPG - March 2019
- Water and flooding CPG - March 2019

9.8 Other documents

- Kings Cross / St Pancras Conservation Area Statement (2003)
- Regent's Canal Conservation Area Statement (2008)
- Camden Housing Delivery Test Action Plan (2020)
- Camden Climate Action Plan 2020

9.9 Emerging policy and guidance of relevance

- Camley Street to Canal Side SPD (2020 Draft version)
- Camley Neighbourhood Plan (referendum draft 2019)
- Draft Site Allocations Plan (Consultation draft 2020)

10 ASSESSMENT

10.1 The principal considerations material to the determination of this application are considered in the following sections of this report:

11	<u>Land use and principle of development</u>
12	<u>Strategic implications for health care provision and local health and wellbeing</u>
13	<u>Design, Character and Appearance, Impact on Heritage Assets</u>
14	<u>Open space, Landscaping, Trees, Nature and Biodiversity</u>
15	<u>Accessibility</u>
16	<u>Impacts to neighbouring amenity</u>
17	<u>Transport and highways</u>
18	<u>Canal bridge</u>
19	<u>Land contamination</u>
20	<u>Basement impacts</u>
21	<u>Air quality</u>
22	<u>Sustainable design and construction</u>
23	<u>Flood risk and drainage</u>
24	<u>Safety and security</u>
25	<u>Waste management</u>
26	<u>Economic Benefits, Local Employment and Procurement</u>
27	<u>Fire safety</u>
28	<u>Equality</u>
29	<u>Planning Obligations</u>
30	<u>Community Infrastructure Levy (CIL)</u>
31	<u>Planning balance</u>
32	<u>Summary and Conclusions</u>

33	<u>Recommendations</u>
34	<u>Legal comments</u>
35	<u>Conditions</u>
36	<u>Informatives</u>

11 Land use and principle of redevelopment

- 11.1 Local plan policy G1 (Delivery and location of growth) seeks to ensure “*the most efficient use of land*” within the Borough, but also to focus major developments into areas of anticipated growth that are highly accessible in accordance with the adopted site allocations local plan (SALP). The site is not located within the Central London Activities Zone (CAZ), or any town centre. However, the site is highly accessible via public transport, with a PTAL rating of 6b (highest rating), and is included as a critical site within the adopted SALP.
- 11.2 The whole of the St Pancras Hospital site is identified in the current (2013) Site Allocations Local Plan (SALP) as Site 6 – 4 St Pancras Way. Within the 2020 draft SALP, the entire hospital site is still identified as an independent development site (ref: CSP5) as well as sitting within the Camley Street & St Pancras Way policy area (ref.CSP1) and the Knowledge Quarter policy area (ref.KQ01). Full weight is afforded to the existing SALP, whilst limited weight is afforded to the emerging SALP given that it has already been through a process of public consultation.
- 11.3 At present, the entire development site is used for the provision of medical or health services (Use Class E(e)). The wider St Pancras Hospital is also predominantly within this use, but also includes some mental health inpatient accommodation blocks that are residential intuitions (Use Class C2). The proposed development would include a composite of uses within a single planning unit that would include the provision of medical or health services; medical research; education; ancillary office and plant areas; public waiting and exhibitions spaces; as well as retail and café areas. A summary of the existing and proposed land uses within the development site area are set out in the table below.

Existing site	Areas (GIA) in metres squared
Provision of medical or health services (Use Class E(e)).	6009
Total	6009
Proposed site	
Class E (Commercial, business and services) (e): Provision of medical or health service (g) (ii) Research and development of products or processes	27,988 (19,938 + 8050)
Class E (Commercial, business and services) (a) Display or retail sale of goods (b) Sale of food and drink for consumption (mostly) on the premises	303
Class F1 (Learning and non-residential institutions) (a): Provision of education	1980

Ancillary plant, circulation, cores and public areas	16,873
PROPOSED TOTAL	47,144
Total uplift above existing (net)	+41,135

11.4 As set out above, the proposal would involve a single building hosting a range of activities that fall within Use Classes E and F. Due to the composite nature of the proposed use within a single planning unit; it would be a mixed use not falling within a particular use class (sui generis).

Adopted Site Allocation Local Plan (SALP) policy

11.5 The existing SALP policy for the site supports a mixed-use redevelopment of St Pancras Hospital “*comprising health and medical related uses and/or permanent (C3) housing and affordable housing and other complementary uses*”. This policy sets an expectation for adequate re-provision or relocation of health and medical facilities alongside optimising the site for new housing (including affordable). Other policy aims for the site include increasing permeability for pedestrians and cycles, improving the relationship to St Pancras Gardens, creating active frontages and infrastructure for local energy generation. Finally, the policy sets an expectation that developments respond to the heritage value of the site and surroundings, and seek to reuse buildings making a positive contribution.

11.6 The proposed development, taking up only part of St Pancras hospital site, is considered to comply with the aims of this policy. Although it would not include any housing it does not jeopardise the potential for it to come forwards elsewhere on the wider site at a later date. The development would reprovide medical/healthcare uses onsite, deliver increased pedestrian and cyclist permeability and active frontages as well as future proofing for local heat networks. There is some conflict with the aspirations for the reuse of buildings which make a positive contribution to the CA, and this is fully considered in the design and heritage chapter of this report.

11.7 The existing SALP policy would support the re-provision of medical uses as part of the development of the site, and the proposed composite mix of health care, health research, education (focused on advancing the study of ophthalmology) as well as ancillary uses are all considered to represent a complementary replacement for the existing uses of the site. These would also renew the significance of the site for health care provision, something which the site has been closely associated with for over a hundred years. This would, however, only address one half of the SALP aims and, by not including provision of housing, place a further requirement on the remainder of the hospital site. The implication for this assessment are discussed below.

Educational floor space

11.8 In order to justify the strategic need for the c.1900sqm of educational floorspace, an academic needs assessment was provided as part of the assessment. This notes that the proposal has been designed with a specific end users in mind (IoO) and that this provision would represent a replacement of the facilities currently at City Road. It was also noted that the existing facilities are no longer fit for purpose

and that the proposal would also allow for a greater integration of the IoO with other health related departments from UCL that are present within the Knowledge Quarter, such as at UCLH. The need and justification for the educational use is therefore accepted, the educational space to be provided is intrinsically linked to the health care use and there are significant benefits from co-location.

Retail and café uses

11.9 The development would also include c.300sqm of commercial floor space in the form of cafes and retail units that would sit next to either entrance. Whilst LP policy TC1 and TC2 would generally resist the provision of new retail or town centre uses within major centres, it is noted that these provision would in effect remain ancillary to the main use of the building and would be generally self-servicing, rather than a specific draw for footfall. These uses would complement the main use (it is note unusual for healthcare facilities to provide a limited retail and food offer for staff and patients) and would not harm local amenity nor the success or viability of any designated town centre. The provisions of these uses are therefore accepted in this instance.

Mixed use policy & housing

11.10 Local Plan policy H1 confirms that self-contained accommodation remains the priority land use for the Borough, and that the Council will resist alternative development of sites identified for housing. Being outside of the CAZ or any town centre, the requirements for 50% of new floorspace to be residential set out in Local Plan policy H2 does not apply. However, the aforementioned SALP policy does set an expectation that new housing to be provided as part of a mixed use development of the hospital site. Material weight is also given to the fact that Camden was required to produce a housing delivery action plan in 2020 to ensure that housing delivery remains in line with government targets.

11.11 Despite the above, officers conclude that lack of housing provision within this development would not mean that the scheme is contrary to the requirements of policies G1, H1 or the SALP. The scheme would still deliver other land uses and services of strategic importance that would accord with the other policy expectations for the site. Furthermore, it is acknowledged that provision of residential accommodation would not complement the other proposed uses within the hospital itself and would require severing of cores, floors and access arrangements that would likely result in hostile living arrangements and undermine the design and functionality of the building. As the policy H2 would not apply in this instance, and residential accommodation is not considered appropriate or practical to include as part of the onsite mix, no off site contribution or payment in lieu of housing would be sought.

11.12 The above conclusions, however, remain dependant on the assumption that it would still be possible to deliver an appropriate contribution towards the housing supply from the development of the remainder of the hospital site as part of a future application. Consideration of the split site approach hereby taken is given below.

Split site approach

- 11.13 The development would include only part of a wider site allocated for mixed use redevelopment within the SALP (St Pancras hospital). In order to comply with the requirements of the SALP and LP policies G1 and H1, it is vital that this scheme does not impede the development potential of the wider site. This is particularly key given that the requirement to provide an adequate supply of new homes would rest upon the wider site.
- 11.14 As outlined earlier, C&I have recently appointed a development partner to develop a masterplan for the remainder of their site. Although this remains outside of the scope of this application, officers have insisted throughout the pre-application process the need for clear evidence that the hospital site as a whole is being considered holistically and that the Oriel scheme would not impede the potential of the wider site. Initially, the Council maintained that a single application would be required for the entire site in order for this to be fully considered, however, it was demonstrated that such an approach was unworkable in practice due to the split in ownership, management and nature of the two developments.
- 11.15 Instead, regular sessions were convened throughout the pre-application process involving all relevant parties (i.e. Oriel partners, C&I and KCCLP) where emerging masterplan ideas were tested against the Oriel plans. This process highlighted that changes to the initial Oriel scheme were necessary to ensure that the remainder of the site would remain feasible for redevelopment. These meetings affected changes including a relocation of the entire Oriel footprint, drop off area, amendments to massing and building lines as well as servicing, and access arrangements. In addition, during these sessions an illustrative masterplan for the wider site was developed in a manner agreed by all parties. This has subsequently been presented in support of this application. This focused primarily upon establishing key principles for new public realm and routes through the site, as well as setting indicative plots for new developments and highlighting the heritage buildings that are intended for reuse. It also included indicative details for land use proposals, including where new housing could be provided as part of a mixed use scheme. An extract of the illustrative parameters plan is set out below. It is important to note that no assessment of the acceptability of this plan is made at this stage and that this was prepared for the sole purpose of addressing concerns regarding the implications of the Oriel proposal upon the potential of the remaining site.

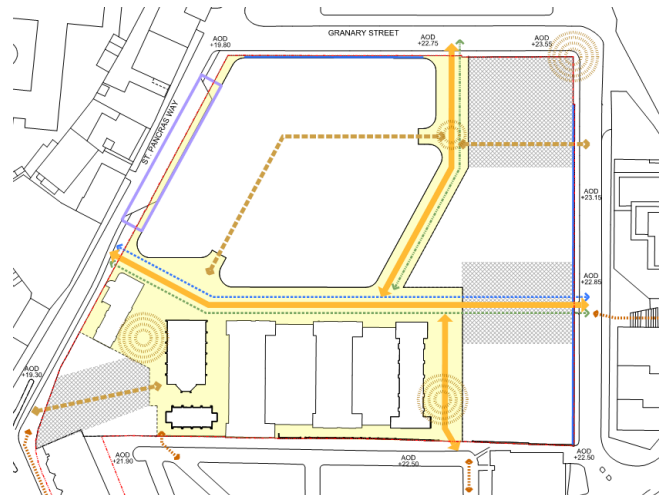


Figure 3 – extract of illustrative parameters plan prepared by C&I/KCCLP and submitted in support of this application

11.16 Although this plan remains illustrative at this stage, it does provide comfort that the siting, orientation and massing of the proposed Oriel building would fit within a site-wide masterplan that would deliver the additional land use aims of the site policy. This parameters plan also broadly reflects the site specific guidance published by the Council within its Camley Street to Canal Side planning framework, which similarly prioritises new North-South and East-West connections across the site, bringing together desire lines from the new canal foot bridge and approved routes through the UBB site through to the St Pancras Gardens and beyond. An extract of the illustrative masterplan development is set out below.



Figure 4 – extract of site masterplan from Camden's Camley Street to Canal Side planning framework highlighting key aspirations for new routes, public realm and retention of heritage buildings of highest significance

11.17 In addition these parties have also, under the conditions of the land sale, signed a legally binding cooperation agreement which obliges them to (amongst other things), work together to develop plans in a conducive manner, effectively co-manage construction phasing and arrangements as well as the future management of the routes and public spaces.

11.18 Whilst this permission would not place obligations upon C&I/KCCLP to bring forward their scheme, the submitted evidence remains a material consideration and officers note that the C&I are now both publicly committed, and contractually obliged to continue to develop and deliver plans for the remainder of the site. In light of the above, officers conclude that the evidence is sufficient to demonstrate that the scheme hereby proposed would not inhibit the remainder of the site being realised in a manner that would achieve the land use policy aims for the hospital site as a whole.

Emerging Site Allocation Local Plan (SALP) policy

11.19 As set out above, the emerging draft SALP include three separate policies which would apply to the application site. They are considered in turn below.

KQ1 – Knowledge Quarter Innovation District:

11.20 This draft policy applies to all development within the emerging ‘Knowledge Quarter’; the existing and growing cluster of world class academic, cultural, research, scientific and media institutions and organisations within approximately 1km of Kings Cross/St Pancras stations. The emerging policy would apply to all major proposals for additional employment/research or educational floor space within this policy area.

11.21 It is considered that the development would overall comply with this emerging policy and to help develop and strengthen the role of the knowledge quarter in Camden’s economy. The development would lead to the establishment of a world leading centre for eye care, education and research within the heart of the Borough in an area where these uses are prioritised by this emerging policy. The proposals have been developed alongside a number of the key KQ organisations (e.g. NHS CCGs, UCL, Moorfields and C&I) and the site was selected precisely due to the proximity to other key sites within the knowledge quarter for the advancement of collaboration. The strategic need for enhancement of Moorfields’ current facilities has been well evidenced through the NHS service transformation development work that has remained ongoing since at least 2017. Proposals would provide a built-for-purpose life sciences institution that falls within the identified priority growth sector; providing critically important life sciences research and education as well as primary health care. Although the entire building would be owned, operated and managed by Moorfields (an NHS provider), ancillary office space would provide spaces for accelerates that will help drive innovation. Given the fact that the end users are known and either NHS providers or educational institutions, it is not considered necessary to secure any affordable workspace in this instance. All internal activities would fall under the management of the Oriel partners and would be associated with the field of ophthalmology. Consideration of the social value and contributions towards supporting infrastructure are detailed later in the report.

CSP1 – Camley Street and St Pancras area:

11.22 This emerging area policy would apply to all developments within an area that straddles the Regent’s Canal and stretches from Elm Village in the north to St

Pancras station in the south. This would include the St Pancras Hospital site, alongside all other adjacent sites such as the UBB. It seeks to help support and encourage the development of a 'new neighbourhood' with a strengthened role for both employment and housing.

11.23 As set out in the split site approach section above, the applicants have demonstrated how they have developed their plans in conjunction with the adjacent land owners and in response to the developments either approved or being built in the surrounding area. This shows that the new public routes and spaces created within the site would marry up with adjacent sites (E.g. 101 Camley Street and UBB) to provide new walking routes that would improve the pedestrian and cycling permeability of the area. As will be detailed later in the report, the applicants have also accepted an obligation for an appropriate contribution towards the cost of a new foot bridge over the Regent's Canal that would land on the corner of Granary Street. This piece of supporting infrastructure is deemed essential in unlocking the potential of this new neighbourhood and improving pedestrian links across the canal (E/W). Discussion on urban greening factor and the design of the proposals are set out later in the report. It is considered that the development would accord with the overall aim of this emerging policy.

CSP5 –St Pancras hospital site:

11.24 This emerging site specific policy sets out the Council's updated aspirations for the hospital site as a whole. The policy introduces 6 criterion (a-h) which seek for developments to (in summary):

- Demonstrate a co-ordinated approach, ensuring that individual parcels do not prejudice the aspirations for the wider site and/or adjacent sites
- Retain and reuse key buildings of heritage or towns space significance
- Create more engaging street edges / active frontages
- Create new public routes (E/W)
- Better connect to St Pancras gardens (N/S)
- Explore new public realm in the NE corner of the site
- Reinforce role as a key gateway location and
- Improve relationship to northern Somers Town

11.25 As set out above, officers welcome the evidence of a co-ordinated approach to the hospital site as a whole and comfort provided in terms of the ability of the potential of the wider site to be realised. The development would involve the demolition of buildings noted to be of townscape value and significance to the conservation area, however, the development would not affect any of the original workhouse buildings within the wide hospital site that are proposed for future reuse within the illustrative parameters plan. Full assessment of the harm from the loss of the buildings within the site and consideration of the proposed building is detailed later in the report. It is noted that this proposal would match the figure included alongside this draft policy showing preference for new routes, frontages and public spaces. Overall it is considered that the proposals would comply with the requirements of this emerging policy.

Draft Camley Street Neighbourhood Plan

11.26 The site is not included within the plan area, with the boundary which running along Granary street to the east. However, it is also noted that the proposed development would accord with the aims of this plan. The development would provide a major new piece of social infrastructure adjacent to the plan area which would help deliver the aims of policy CS CSN1 (social infrastructure). It would not result in any loss of existing businesses, employment floorspace or light industrial uses (policy CS EM1). No affordable workspace or housing would be secured though as discussed above this is acceptable given the health care use of the facility (policies CS: EM1 / H01 / H02 & H03). Full discussion in to the transport impacts is given later in the report, though it concludes that the design response and relevant mitigation will be sufficient to ensure that the construction and servicing traffic will be properly managed and to encourage active transport (policy CS TR1 / TR2). Discussion into the impacts on surrounding open spaces and nature conservation is given in the design and open space chapters of the report, though these conclude that the development would avoid harm to surrounding spaces and to positively contribution new public realm and routes and generation biodiversity net-gains in line with the aims of policies CS GI1 / GI2 and GI3. The design chapter sets out a full review of the approach but this concludes that the development would represent high quality contextual design that would improve local connections, permeability and accessibility, appropriately adhering to the design principles set out in policies CS DQ1 and DQ2. This includes preserving the local views of significance (from the tow path next to the constitution pub as well as looking south along Camley Street towards St Pancras station as well as contribution towards a new footbridge over the canal. Similarly, the heights proposed (CS DQ3) are considered appropriate given the emerging surrounding townscape, full discussion is provided in the design and heritage chapter.

EIA

11.27 As set out in the planning history section of this report, an EIA screening letter relating to these proposed works was submitted. The Council as Local Planning Authority determined that an Environmental Impact Assessment (EIA) was 'Not required' (see history). An EIA is not required as the proposed development did not trigger the thresholds for Schedule 1 Development or trigger the thresholds for Schedule 2 Development, and was considered to not pose more than localised environmental impacts that would not mean that the development would constitute EIA development. This letter and the decision related to the Moorfields development only, and would not preclude the outcome of a similar assessment in relation to the wider site if that comes forward at a later date. An assessment of the environmental impacts relating to this proposal is instead made as part of this decision.

Conclusions of principle of redevelopment and land use

11.28 The redevelopment of the site and the uses provided would be supported by the development plan and would further the historic legacy of health provision from the site and further the significance of the knowledge quarter. The proposals would amount to a major investment in social and health infrastructure for both the Borough and nation, with ophthalmology poised to become even more of a critical

sector as trends in aging populations continue to be borne out. Significant weight is afforded to the lack of housing provision. However, given the evidence to show that development potential of the wider site [including for housing] is not impeded and the incompatibility with the medical uses, this is accepted in this instance. Overall it is considered that the principle of redevelopment and the land uses proposed would remain in accordance with the development plan and supporting guidance.

[Link to assessment content table.](#)

12 Strategic implications for healthcare provision and local health and well being

Strategic health care provision

- 12.1 Notwithstanding the 'in principle' support for the site's redevelopment and mix of land uses proposed, consideration must also be given to the strategic implications for health care provision. The implications of the development on the Borough's, London's and, to some degree, country's health care provision is multifaceted. The development would cause a number of existing services to be displaced off site and would introduce of new NHS services onto the site that would be relocated from outside of the Borough.
- 12.2 Local Plan (LP) policy C2 (Community facilities) 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"*. LP policy C1 (Health and wellbeing) also notes that the Council will *"support the provision of new or improved health facilities, in line with Camden's Clinical Commissioning Group and NHS England requirements"*. New London Plan (NLP) policy S1 (Developing London's social infrastructure) seeks to support the delivery of new social infrastructure that is accessible, high quality, inclusive and addresses local or strategic needs. This policy also set requirements to prevent a net loss in social infrastructure in all instances unless supported by adequate re-provision or consolidation as part of a wider public service transformation plan. NLP policy S2 (Health and social care facilities) also supports provision of new or enhanced health care facilities that are high quality, accessible and meet identified needs. This policy also places emphasis on the need for Boroughs to work alongside Clinical Commissioning Groups (CCGs) to assess strategic needs, plan for sites proactively, support growth and encourage integration, co-location or reconfiguration of services to release surplus land for other uses.
- 12.3 In 2019, NHS England published its 'NHS Long Term Plan', which sets out how it will seek to improve its service model and health outcomes whilst remaining financially and environmentally sustainable over the coming decades. It places emphasis on its regional partners to develop transformation plans to help its delivery. In response, organisations that provide health, care and voluntary services in Barnet, Camden, Enfield, Haringey and Islington (North Central London) produced a draft joint strategy titled the *'North Central London*

Sustainability and Transformation plan'. This plan was produced by five local authorities, five clinical commissioning groups as well as the following providers:

- Barnet, Enfield and Haringey Mental Health NHS Trust;
- Camden and Islington NHS Foundation Trust (C&I);
- Central and North West London NHS Foundation Trust;
- Central London Community Health Care NHS Trust;
- Great Ormond Street Hospital;
- Moorfields Eye Hospital;
- North Middlesex University Hospital NHS Trust;
- Royal Free London NHS Foundation Trust;
- Royal National Orthopaedic Hospital;
- Tavistock and Portman NHS Foundation Trust;
- University College London; and
- Whittington Hospital.

12.4 This sets out a five year plan for how local health and care services will be transformed and become more sustainable, and replaces an earlier 2016 report which set out the case for change. The scheme hereby under consideration is considered by both the Oriel partners, and C&I to be an integral part of the delivery of this service transformation plan, as discussed in turn below.

Relocation of Moorfields and UCL Institute of Ophthalmology

12.5 The proposal would involve the full relocation of services and facilities currently provided across a collection of sites in and around City Road in Islington. These are collectively referred to as the 'City Road site'. If approved, the Oriel partners would continue to offer services at the City Road site until the new building was fully complete, at which point it would dispose of the site. The proceeds of this land sale would fund the construction of the new centre, with the treasury reclaiming payment once the new building is complete and the previous land disposed of.

12.6 The City Road site contains a number of facilities located in adjacent, but separate buildings. Some of these are over 125 years old and are considered to be no longer fit for purpose as a medical institution by the applicants. The existing layout requires staff members, patients, goods and even sensitive materials to travel/be transported externally between buildings and is not conducive to a collaborative working relationship between the clinical care and research areas. Within their submitted planning statement, it is noted that these facilities are becoming increasingly costly to maintain and would be in need of major works if services were to be retained. This is supported by the latest report by the Care Quality Commission (2019) that noted that although the quality of service was outstanding, the safety and layout of the facility was a limiting factor. Public engagement with their staff and patients undertaken by Moorfields also showed a preference for a new, purpose built facility rather than attempting to remodel the existing buildings at City Road.

12.7 Noting the above, it is accepted that the proposal would bring about a significant enhancement in the provision eye care, as well as furthering these institutions'

ability to research and study new and innovative treatments and apply those directly in trials. The new facility would be purpose built, meaning that it would not suffer from the spatial limitations of the existing site, and can provide a far more legible and pleasant experience for patients. It is noted that these plans have been co-produced by the relevant CCGs and other health partners and would represent a strategically important investment for the future of eye care in England, and world-leading clinical research and education. Although it is noted that the move would still result in some disruption, as staff and patients adjust to new travel patterns and facilities, this should remain temporary and will ultimately result in a major enhancement in the quality of services and facilities on offer. Discussion of mitigation secured to reduce the impacts of new travel behaviours and patterns is discussed within the transport and equalities section of the report. Subject to securing the commitments made by the applicants in terms of maintaining a continuation of services at the City Road site until the new development is completed, it is therefore considered that the proposed relocation would be supported in principle. An obligation regarding maintaining a continuation of service until the new facility is completed is therefore recommended.

Displacement of existing services

12.8 In order for this development to come forwards, the existing buildings within the site would be demolished and the services hosted within them relocated. At present, C&I remain the freeholders of the entire site and operate most of the services from within it, though there are also some non-C&I uses within the Bloomsbury Day hospital building. The table below includes an audit of all of the buildings within the development site and the services they host. All of these are operated by C&I unless otherwise indicated by italics.

Building name	Current services
Bloomsbury Day hospital Recovery Centre	Mental Health Crisis Assessment Centre <i>Kings Cross GP practice*</i> <i>GP out of hours service**</i>
Ash House	Rehabilitation and recovery inpatient services
Jules Thorn Day hospital	South Camden Recovery Centre Clozapine Clinic
Estate & Facilities building Camley Centre	Adult Autism ADHD Team Complex Depression, Anxiety & Trauma service Icope psychological therapies - South Camden
Workshops and substation	Utilises / ancillary
Kitchen building	Catering supplies / ancillary

**Operated by ATS Medical*

***Operates by NHS North Central London CCG*

12.9 As part of their own service transformation plan, C&I have committed to fully overhaul their portfolio of properties with the aim of enhancing service quality whilst also ensuring long-term sustainability. Similar, to the City Road site, the buildings currently onsite are all deemed to be no longer fit for purpose, either

lacking in space, facilities, or of poor build standard when considering modern expectations for medical facilities. They are also low density when considering the surrounding pattern of development, presenting the opportunity to consolidate services and funding improved or new facilities elsewhere. If planning permission is granted, the proceeds from the sale of this portion of the hospital site to the Oriel partners will be used by C&I to build new or upgrade facilities in line with their service transformation plan. A principal driver for this will be securing funds to deliver the new mental health ward at the Whittington Hospital in Highgate which already benefits from planning permission and would host much of the mental health provision in new, purpose built facilities.

12.10 In support of this application, C&I have provided the Council with a full audit of their plans for the relocation of their services. This sets out the proposed locations of all of the existing services, including those that are the subject to emerging and confidential plans. These would be accommodated within the new ward in Highgate (LB Islington/Camden), or expanded facilities at Daleham Gardens (LB Camden), Greenland Road (LB Camden) or the Peckwater Centre (LB Camden), with an additional site also being considered for the Kings Cross GP and out of hours service within the vicinity of the existing site. Planning for these moves are already either underway or are at an advanced stage, though some physical work will still be required. Whilst they are not all fully ready for occupation, the lead in time for the development implementation (discussed earlier) and public commitments already made by C&I for these moves mean that they are expected to all be ready in time for occupation when construction would begin. This means that C&I has committed to re-providing all services directly affected by the development, with most services being retained within the Borough.

12.11 In addition to the above, details of the co-operation agreement signed between the Oriel partners, C&I and their development partners (KCCLP) have also been submitted in confidence in support of this application. This confirms that the sale of the land from C&I to the Oriel partners is contingent on vacant possession. In other words, this obliges C&I to have relocated all services from the development site in advance of the land sale, meaning no break or loss in service offer. Again, whilst these changes will cause temporary disruption as patients and staff members adjust to new travel routes, this should remain temporary in nature and would ultimately result in the provision of enhanced services and facilities. Subject to an obligation within the legal agreement, requiring submission of evidence of the successful relocation of these services to the sites prior to commencement of construction, it is therefore considered that this displacement would not result in the loss of any service provision.

12.12 In light of the above commitments, which in part depends on the actions of an adjacent land owner (C&I), it is noted that the three year standard period for implementation may not be sufficient. Given that the commitments made are considered necessary to ensure no loss in service provision, officers acknowledge that a longer implementation period would represent a beneficial planning outcome by facilitating both the proposed development well as the mitigation seen as necessary for it to take place. In order to justify the extended period, and the divergence from the three year standard set out in the planning act, a detailed strategy was provided by the applicants that sets out the actions needing to be

taken and an associated forwards plan. In light of this evidence, officers considered that an extended period of 5 years (as per the applicant's request) is reasonable and justified in this instance. The implementation condition is amended accordingly.

Local health and well being

- 12.13 Further to the above, the development plan also expects developments to help improve health outcomes for the communities within which they are based. LP policy C1 notes that the Council will improve and promote strong, vibrant and healthy communities through ensuring a high quality environment with local services to support health, social and cultural welling and reduce inequalities.
- 12.14 The application includes a Health Impact Assessment (HIA) that has been created and submitted in line with policy C1 and the Mayor's HIA assessment guidance. The report contains a matrix assessing the proposal in 11 key areas which contribute towards the overall health of occupiers and visitors of the development, including contributions to community-accessible facilities, air quality, crime reduction, open space and minimising the use of resources. The focus of the development on a health care, or related science and innovation building presents an opportunity for the development to contribute to reducing inequalities and increasing life chances in neighbouring communities from a health perspective.
- 12.15 The local area experiences high rates of begging and street drinking/substance abuse, which is discussed in more detail in the Crime and Community safety section. This concludes that the proposed building is likely to make a positive contribution to local community safety. The existing site is highly insular and defensive, preventing pedestrians from travelling across it and forming a harsh pedestrian environment to surrounding streets. The proposals would also lead to the creation of a new, publicly accessible walking route across the site which would be landscaped to a high standard including areas of new planting and replacement trees. This route would be open and inviting, encouraging pedestrians and cyclists to travel through the site as part of a wider network of new routes that will make the area much more permeable and attractive for walking and cycling.
- 12.16 As set out later in the report, the design of the building itself also includes a route through its central atrium that will be publicly accessible during normal working hours and will offer freely accessible displays and exhibitions. These spaces are designed to be welcoming and inviting and will be available to all. Where reference to 'normal working hours' is given, for clarity this relates to the core hours of operation, being between 6am – 11pm daily, though parts of the development (e.g. eye care A&E and security areas) will remain operational 24/7, but with controlled access.
- 12.17 Accessibility is discussed later in the report, though it concludes that the proposal features an inclusive approach and that, through the mitigation outlined in the transport section, both walking and public transport links to the site are to be enhanced to ensure a prioritisation of sustainable modes of transport for all users, including more vulnerable patients. Through the offer in terms of local employment and training opportunities, the development would also help to foster greater social

cohesion by bringing local residents into both the construction and end phase of use. Commitments have also been made in terms of promoting the STEAM objectives and working to broaden participation in the field through the community outreach plan secured as part of the legal agreement. Subject to the above being secured by S106 and the mitigation discussed elsewhere in the report, the proposal is considered to be acceptable in terms of its contribution to improving health and wellbeing in accordance with policy C1.

Conclusions on strategic health implications and health and well being

12.18 The proposed development is considered to mark a major step in the implementation of joint NHS Service Transformation plan prepared by the North Central London health providers. The development would be paid for via the release of surplus land at the City Road site by Moorfields. It would also generate a capital receipt for C&I that would be used to pay for new and enhanced facilities across their portfolio, including a brand new mental health ward in Highgate as well as plans for the future redevelopment of the wider St Pancras Hospital site. As well as providing a new, purpose built facility for the study, research and provision of eye care for London, the works would also allow for major investments in facilities for mental health provision. The development can therefore be seen as key to the implementation of the strategic service transformation plan. Subject to securing commitments made by both the Oriol partners and C&I to avoid any break in service provision, the development is therefore considered to not result in any loss of social infrastructure, community or health facilities for which there is a defined need. Rather, the development would facilitate a major investment in eye care and mental health provision in line with a strategic plan co-created by all health partners within North Central London. In addition, through the enhancement of community safety, offer for the advancement of local employment opportunities and community outreach as well as the contributions towards infrastructure for walking and cycling and public transport, the development is considered to result in enhance local health and wellbeing outcomes.

12.19 The proposal is therefore considered to comply with the requirements of LP policies C1, C2 and NLP policies S1 and S2. Consideration of impacts to protected groups is provided under the equalities section of this report.

[Link to assessment content table.](#)

13 Design, Character and Appearance, Impact on Heritage Assets

13.1 This chapter assesses the building design and its impact on local townscape and heritage assets. The chapter is structured as follows:

- a) *Summary of statutory provisions & policy framework for assessing impact on heritage assets*
- b) *Site: overview, context and heritage assets*
- c) *Design: overview, layout, massing, height, street level, architecture, materials, impact to local views*
- d) *Heritage impacts:*

- *Conservation areas*
 - *St Pancras Gardens*
 - *Views and setting of listed buildings and structures*
 - *Archaeology*
 - *London View Management Framework View*
 - *Overall heritage impact and balance*
- e) *Design and heritage conclusion*

(13a) Statutory provisions and policy framework

13.2 As set out in section 8 of the report, sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”) are of critical importance. The effect of S.72 provides the statutory basis for a presumption in favour of preserving or enhancing the character and appearance of Conservation Areas. Considerable importance and weight should be attached to this presumption. They note that a proposal which would cause harm should only be permitted where there are strong countervailing planning considerations to outweigh the harm. The NPPF provides guidance on the weight that should be accorded to such harm and in what circumstances such harm might be justified.

The National Planning Policy Framework 2019 (NPPF)

13.3 Government guidance on how to carry out those duties is found in the National Planning Policy Framework, Feb 2019 (NPPF). At the heart of the framework is a presumption in favour of 'sustainable development' where conserving heritage in a manner appropriate to their significance is one of the 12 core principles.

13.4 NPPF policy advises that for new development to be sustainable it needs to encompass an economic, social and environmental role, with the latter (paragraph 8c) including the protection and enhancement of the built and historic environment. Paragraph 8 notes that these roles are interdependent and should not be taken in isolation; and that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

13.5 Chapter 16 (Conserving and enhancing the historic environment) sets out how the historic environment should be conserved and enhanced. Harm to significance should require clear and convincing justification. Substantial harm to a designated asset should be exceptional or wholly exceptional, as befitting the importance of the asset. Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is ‘substantial’, or ‘less than substantial’. If the defined harm is ‘substantial’, the advice is that it should be refused. If the harm is deemed to be ‘less than substantial’, the NPPF requires that harm to be weighed against the public benefits of the proposals. If the public benefits identified do not outweigh the harm, it should be refused.

13.6 The following assessment is made with due regard to these legislative requirements and policy framework.

(13b) Site overview, context and heritage assets

Site characteristics

13.7 St Pancras Hospital began life in the early eighteenth century as the St Pancras Workhouse, which evolved through a number of iterations as the pressures of numbers and sanitation took their toll, until a somewhat fractious and chaotic rebuilding programme started in the late nineteenth century. Twentieth century saw the site converted from a workhouse to a hospital which subsequently suffered heavy bomb damage during the war. Both of which resulted in later additions and rebuilding of replacement buildings. The hospital site is fully enclosed by either a brick perimeter wall or, to the south, metal railings that front the gardens. The only building which presents a publicly facing frontage is the South Wing building, which sits just to the south of the otherwise inward looking and enclosed main site. The site is predominately hard surfaced, providing surface parking for the hospital buildings, though there are some areas of amenity lawns and planting. This is in stark contrast to the verdant gardens to the south. The hospital site has a sloping ground level, with the eastern boundary (to Granary Street) being a full storey higher than at its western boundary (St Pancras Way).

Local context

13.8 The St Pancras Hospital site bridges a transition between the courser grain development to the East (Kings Cross Central – the Argent development) and the finer grain, more domestic development of Camden Town and Somers Town to the West.

13.9 Whilst these domestic areas to the west / south west of the site are characterised by Edwardian and Victorian and post-war buildings that vary from 3 to 6 storeys in height, further to the north the new Travis Perkins building is 7 storeys high, with a double height ground floor. The south of the site, the wider St Pancras Hospital site is predominantly made of the original 19th century 5 storeys workhouse buildings along with the more modern additions such as the Huntley Centre. The area north and east of the site is characterised by new taller development which ranges up to 12 storeys in height. The UBB site immediately to the north also has extant permission for a mixed use scheme featuring blocks of up to 12 storeys. Notable from this varied context is that, the local area is one which is experiencing a great degree of change. Given its siting, the St Pancras Hospital site is seen as key in unlocking and enhancing the land use potential for a wide area of city and facilitating the implementation of the local development plan.

13.10 The site also sits within the ‘Knowledge Quarter’, a cluster of world leading life science and knowledge industry uses positioned along the Euston – Kings Cross region. At present, the 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. In recent years, planning approval

for a number of key developments such as the Crick Institute, Eastman Dental hospital and Belgrove house have all acted to enhance this legacy and the significance of the quarter.

Kings Cross and St Pancras conservation area

- 13.11 The site is located within sub area 1 (St Pancras Gardens) of the Kings Cross/St Pancras Conservation Area. The conservation area was first designated in 1986 and was enlarged in 1991 and again in 1994 to include the area around St Pancras Gardens. The settlement of the area to form the hamlet of St Pancras dates back to medieval period, with the St Pancras Old church being rebuilt during the 12th C adjacent to the River Fleet (now culverted) to serve a surrounding parish. The area remained a relatively small and isolated settlement, until it was the subject of major urbanisation from the latter half of the 18th century onwards. During this period, the opening of the Regent's Canal in 1820 and subsequent railway lines, goods yards and passenger termini (Kings Cross station opening in 1852, St Pancras opening in 1868) profoundly affected the built environment, shaping the area as we know it today. During this period, domestic streets of Somers Town and Camden Town were laid out, along with institutions such as the St Pancras workhouse. The significance of the conservation area is primarily based upon the surviving townscape from this later Victorian phase of development. Three story townhouses in and around Goldington Crescent, the St Pancras Gardens and some of the buildings within the hospital site survived the blitz. Within the hospital site, a relatively coherent group of nineteenth century buildings from this phase survive on part of the site and play a significant role in defining the character and appearance of this part of the conservation area.
- 13.12 There are no listed buildings or structures within the hospital site. In 2015 Historic England was asked to assess all buildings of the hospital for Certificates of Immunity from Listing (CoIL). After careful consideration it determined that, whilst the buildings were of local townscape and historic value, "*none are of sufficient architectural merit, intactness nor special historic interest to merit listing*" (2015 Historic England CoIL report). As such a total of 17 CoILs were issued in July 2015 covering all buildings at the hospital site. Although these CoILs expired in July 2020, it is noted that the robust assessment remain valid. In their submissions in relation to this application, HE also did not recommend any refresh of these assessments.
- 13.13 Whilst there are no listed buildings or structures within the hospital site, there are a number of buildings and features within the hospital site that are noted to make a positive contribution to the special character and appearance of the Kings Cross conservation area. An extract from the conservation area statement highlighting these 'non-designated heritage assets' is shown below (the red line indicates those buildings within the application site).



Figure 5 – marked up extract from Kings X CA statement identifying buildings within the St Pancras hospital site that make a positive (green) and detrimental (orange) contribution to its special character and appearance (approximate development area shown in red)

- 13.14 The features that make a positive contribution within the development site include its brick perimeter wall, the kitchen and boiler block (4), Camley Centre (5) and gatehouse. The CA statement considers the Bloomsbury building (1) to make a detrimental impact on the character of the CA. Other buildings, such as Ash house (2) and the Jules Thorn building (6) make neutral contributions.

Regent's canal conservation area

- 13.15 The Regents Canal conservation area was first designated in 1974 and has been extended several times since. Being a section of the Grand Union Canal, its significance is primarily based in its historic role and industrial heritage of north London, providing an important feature of historic and visual interest. It has increasingly also become an important asset in terms of its amenity value and biodiversity value. Since its first opening, the canal has been a catalyst for change in the built environment and as such the surrounding townscape is highly varied, a pattern which continues today with new large scale developments mixed with retained and reused former industrial buildings forming its setting through its length in Camden. The diverse, changeable and informal relationship between the canal and the surrounding townscape is also an important factor in its significance.

Nearby listed heritage assets

- 13.16 Within the local vicinity there exists a number of nationally listed buildings, structures and monuments. Those that require further consideration given their siting and relationship to the development site are outlined below. All other assets in the wider area are far enough from the site or positioned in a manner such that the development would not affect their special historic or architectural significance nor their setting.

St Pancras Old church (GII)*

13.17 The church building that stands today was largely rebuilt during the 18th Century, but is regarded as one of the oldest sites of Christian worship in Europe. Its core section dates from the 11th century with later medieval additions but also features an alter stone dating from the 6th century. The building is of coarse rubble construction with stone dressings and pantile and slated roof. Subsequent 19th century modifications and extensions were made, meaning the building lacks a definitive architectural style. The significance is primarily grounded in its rich historical interest, both as a place of worship but also in relation to the role it played in the evolving urbanisation of the area through its grave yard.

St Pancras Gardens (GII)

13.18 The St Pancras' Gardens surrounds St Pancras Old Church and was opened in 1891, replacing the original, medieval churchyard and incorporating the burial ground of St Giles-in-the-Fields, Covent Garden. Throughout the late 17th and 18th Century the churchyard had been a significant burial ground. At the time positioned outside of the city, it helped ease the congestion of inner London churchyards. Many were buried in mass graves, including the composer Johann Christian Bach, known as the 'London Bach', who died a pauper in 1782. The use as a burial site ceased following the Burial Act of 1850. The gardens were fully relaid and landscaped by the vestry in conjunction with the Midlands Railway Company after a large section of the churchyard and burial ground was controversially severed to form the mainland railway cutting to St Pancras station. The hasty movement of human remains is said to have been witnessed by, and to have inspired poems of Thomas Hardy. The gardens of today maintain the geometric layout from this time, with main paths aligned to the church lined by mature trees with areas of lawn surrounding tombs and monuments. The significance of the gardens derives from their significant historic interest, but provides a fine example of landscape design of Victorian pleasure gardens that were deigned to provide respite and visual amenity in contrast to the surrounding heavily urbanised surroundings.

St Pancras Corners court (GII)

13.19 Dating from 1886, the coroner's court was purpose built to provide hygienic facilities for the delicate work of post-mortems. It is a red brick building with stone dressings, a slate roof and elaborate detailing carried out in a gothic style that is fitting for its age, location and former use. The significance of this asset is primarily based on its architectural and historic value, particularly its role in the management and operation of the Victorian burial ground. The buildings was extended heavily in the 20th. These extensions do not contribute to its special architectural or historical significance.

Nos.5-16 Goldington Crescent

13.20 Dating from c.1850, this crescent of 12 three-storey terrace houses managed to survive the blitz relatively unscathed (unlike much of the surrounding areas of Somers town and Camden Town), though they were restored in the late 20th Century. They are of London stock, brick construction with stucco ground floor

base. Their significance is primarily based on their architectural value as an intact group and in their illustration of the evolving Victorian urbanisation of the area.

Structures and monuments within St Pancras old church gardens

13.21 As well as the gardens and church being listed in their own right, there are also a number of listed monuments and structures within the St Pancras gardens. These include:

- Tomb of Sir John Soane and family (GI)
- Tomb of Mary Mary Wollstonecraft and William and Mary Jane Godwin (GII)
- Tomb of John Flaxman and family (GII)
- Tomb of Mary Basnett (GII)
- Tomb of Sir Thomas Webb (GII)
- Tomb of Abraham Woodhead (GII)
- Drinking fountain (GII)
- Burdett-Coutts Memorial Sundial (GII*)
- Unidentified tomb (GII)
- Unidentified tomb (GII)

Other structures or monuments

13.22 In addition to the above, there are a number of other listed features in the surrounding area, including:

- Metal gates and railings to Pancras road frontage (GII)
- Cattle trough opposite end of Royal College St (GII)
- Penfold pillar box on St Pancras way (GII)

13.23 The above structure or monuments are generally primarily of historic interest, though some of the tombs and memorials are also of architectural significance.

Archaeology

13.24 The application site does not fall within any designated archaeological priority area as defined by Historic England, but the St Pancras Old Church and burial grounds immediately to the south are designated. The boundary to the priority area is shown in the extract below.



Figure 6 – Boundary of designated archaeological priority area

13.25 The designated area is of tier two status, meaning that GLAAS holds specific evidence indicating the presence or likely presence of heritage assets of archaeological interest. Planning decisions are expected to make a balanced judgement for non-designated assets considered of less than national importance in respect of the scale of any harm and the significance of the asset. Its significance rests in the possibility of evidence of an original medieval rural settlement and the largely intact, post medieval graveyard. Any remains would be invaluable in determining the origins of the shift of the medieval settlement to Kentish Town as well as the origins of the Old Church.

London View Management Framework View

13.26 Policy HC4 of the New London Plan seeks to protect a number of London-wide strategic views that are of significance. Whilst the development sits outside of its boundary, a protected view crosses over Granary Street to the east. This relates to the protected view from Parliament Hill looking towards St Paul's cathedral.

(13c) Design review

13.27 The replacement building would be purpose built with the specific needs of the end user in mind (i.e. provision of eye care, clinical research labs and offices, education spaces and associated plant spaces), but has been designed with future flexibility and longevity in mind. The design approach therefore responds to a complex brief set by both the applicants and the local planning authority that involves balancing requirements of the future for Moorfields and its research partners, environmental design and visual impacts to the surrounding townscape.

Footprint and urban grain

13.28 The footprint of the building would consist of two interlocking 'wings' surrounding a central, covered atrium. The approach to layout has been based on optimising the functionality and efficiency of space and user experience, but also directly responds to the aspirations for new routes and appropriate locations for entrances. The central atrium will bring natural light and fresh air into the heart of the scheme and, combined with the shared core tower, make for a clear and more legible user experience. The ability for clinical staff and researchers to use these 'break out' areas is also one of the key drivers of the approach to layout, encouraging and fostering collaboration.

13.29 The building would not feature a 'back', with all elevations having a public frontage onto the highway or the new pedestrian route running through the site. This would starkly contrast the existing site, which remains totally inwards facing and presents no frontages to the street. Instead, at present the site presents a harsh and defensive boundary to both of its sides that front public highways. The opening up of the site and development would ensure that the building, which will be a civic institution of national significance, will present itself to the public on all sides as well as inviting pedestrians in.

13.30 The proposed footprint would be much larger than the existing buildings within the hospital site. However, it is noted that the resulting urban block would be comparable to other historic institutions such as the UCL Cruciform building, and would be roughly half the footprint of more modern institutions such as Central St Martins in Kings Cross and the Francis Crick institute in Somers Town. It is also noted that the footprint would be smaller than the original plans for the, pre-19thC workhouse building located on the site (aspirations which were never fully realised). This is seen on the figure below.



Figure 7 – proposed footprint imposed over the historic map showing the original scale and layout of the St Pancras workhouse

13.31 Given the transitional character of the site (sitting between Kings Cross central and Camden Town / Somers Town), as well as this history of the site, this urban grain and footprint is considered appropriate in design terms.

Site layout and active frontages

13.32 The Draft Canal side to Camley Street SPD is relevant, it sets out the Council's strategic urban design objectives for the area and the site. In the document, the opportunities and priorities for the Oriel site can be summarised as follows; to address the currently in-turned and island character of the site by improving its permeability and connections to adjoining sites and routes and to make the site more outward looking and inviting. A parameters plan for the site developed by the current applicants and KCCLP, owners of the remainder of the site seeks to address these requirements. The diagram below shows how the site wide illustrative parameters plan and the footprint of the proposed building relates to these new routes through the site.

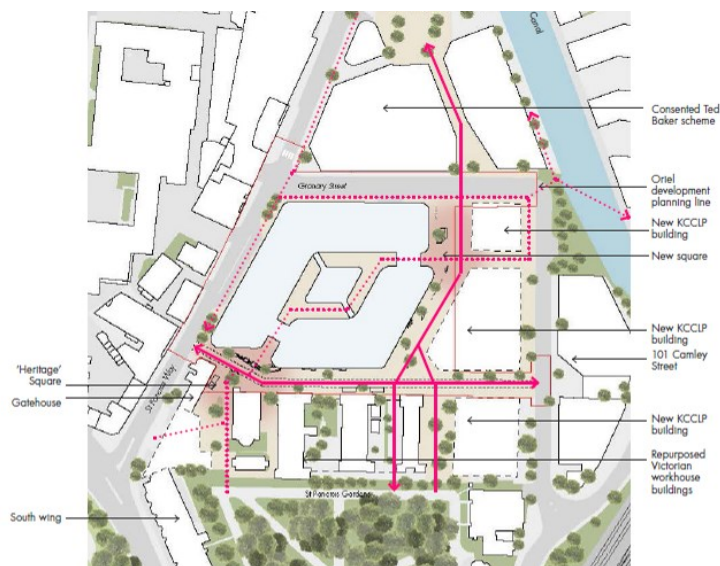


Figure 8 – illustrative parameters plan extract showing routes

13.33 In addition a diagonal route through the atrium space of the building links the main entrance and public realm in the south west to a public space to the northern eastern corner of the site linking to the UBB site and the pedestrian bridge across the canal. Further discussion in relation to the scheme's contribution towards this footbridge is detailed later in the report, but note that this is expected to become an important pedestrian east/west connection in the future and address the existing barrier to movement formed by the canal. The south western corner provides the primary entrance to the building next to the drop off and pick up layby along St Pancras Way. Routes through the site, east-west and north-south are designed to be pedestrian priority routes. Deliveries to the proposed building are from Granary Street to an internal service facility. On St Pancras Way a colonnade provides a covered route from the drop off and pick up area and acts to increase the width of the public realm along St Pancras Way.

13.34 Throughout the pre application and the application stage particular attention has been given to maximising the extent of active frontage on the adjoining routes to the proposed building. Aligning entrances to better fit the routes described above as well as ensuring that all deliveries, servicing and a drop off bay could be

accommodated on the site required considerable efforts through the course of the pre-app stage.

13.35 The lower ground floor along St Pancras Way accommodates the Accident and Emergency and Urgent Care department (eye treatments only) to facilitate easy access from the southwest entrance and the patient drop off along St Pancras Way. The department has been planned to provide waiting spaces along the street edge of the building in order to bring in daylight and allow views out. Around the entrances at both levels, spaces are provided which can be leased out for a café and/or small retail units

13.36 The ground slopes from the southwest entrance up to the southeast corner so the lower ground floor gives way to the ground floor at street level. Here the internal functions are education-related with a conference suite located on the corner. This allows a degree of transparency and visual permeability into and out of the building.

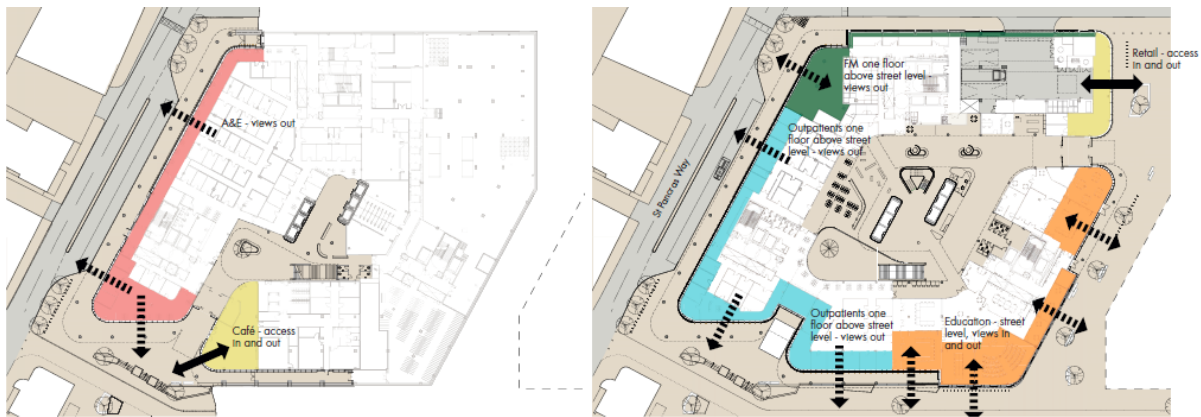


Figure 9 – Active uses/frontages at ground and lower ground floor levels

13.37 The more challenging elevation to achieve an active frontage has been on Granary Street where plant rooms and delivery facilities are located. Grouping these more inactive uses on Granary Street serves to optimise active frontages on the other building edges and reduces the need for vehicular movements with the site. Due to the need to provide a drop off area on level surface to meet the requirements of building control and the desire to maintain pedestrian priority within the interior of the hospital site, this location remains the most appropriate for the deliveries and servicing. The operational requirements of this section mean that it does not naturally provide an active and engaging frontage to the street. Significant efforts have therefore been made to add interest and activation to this street frontage to improve the experience for pedestrians travelling along Granary Street.

13.38 In order to ensure that Granary Street provides a safe and attractive route windows have been added at ground floor level where possible and the applicants have agreed to implement a public art strategy along this frontage (these interventions are described in more detail in the section on detailed design). It has been suggested that a laser cut pattern inspired by the trees of St Pancras Gardens could be a successful approach; however, the final artwork would be commissioned by artists and produced with input from patients and staff before

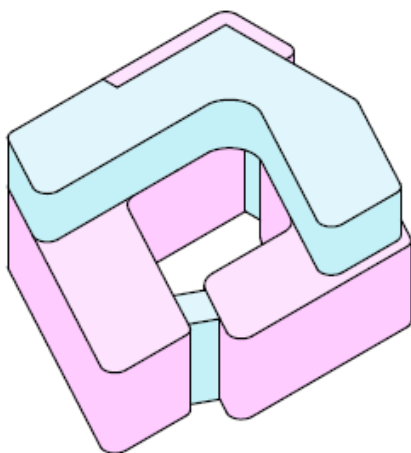
being submitted to the Council for approval. The windows added would create a more visually permeable frontage and allow views into operational areas, including meetings rooms as well as the deliveries areas, that will add interest and a more dynamic experience for pedestrians as well as providing a sense of safety from active surveillance.

13.39 It is considered that siting and layout of the building meet the strategic urban design objectives of the Draft Canal side to Camley Street SPD that is to address the currently in-turned and island character of the site by improving its permeability and connections to adjoining sites and routes and to make the site more outward looking and inviting.

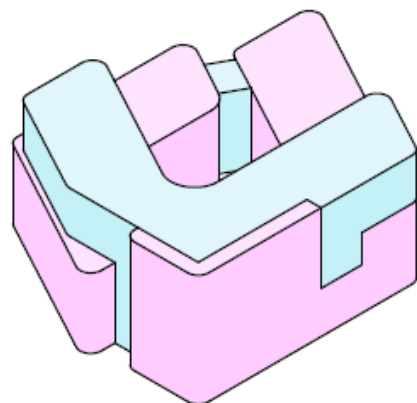
Height and massing

13.40 As set out in the site context section, the building sits within a context of varying building heights and architectural styles which have been taken into account throughout the design process and in the final proposal. The proposed building ranges from 7 to 10 storeys plus roof top plant. Due to the specialist requirements for all of the clinical spaces, floor-to-floor heights of 4.2m are used throughout to accommodate the vast and intricate servicing requirements. This means that the roof of the top storey of the building would be 62m high (AOD) and the top of the recessed frame for PVs and roof plant 69m tall (AOD).

13.41 The massing is composed of three main interlocking parts: two L-shaped wings organised around a central atrium and a volume sitting above the wings on the north east end, set back at various points. The wing elements are connected with each other through small recessed volumes, which accommodate and denote the main entrances to the building. The 'Oriel tower' is located centrally within the atrium, with bridges that connect the various parts of the building. This is illustrated in the massing diagram below.



Parti diagram from south



Parti diagram from north

Figure 10 – Diagrams showing the building elements, with the mid section shown in pink and the crown shown in blue (viewed from south – left and north – right)

13.42 The building's height, mass and scale has been designed with the relationship to the surrounding buildings and streetscape in mind. The building is at its lowest and introduces set back to the crown element where it faces the former Victorian workhouses and St Pancras Gardens, reducing the scale at street level. Conversely, the building steps up in the north and north east where it would respond to the emerging context of new developments of similar height. A higher element rises up on the corner of Granary Street and St Pancras Way and on the north eastern corner to indicate the building as approaching the site. The relationship between the massing and height and surrounding townscape is shown in the figure below.

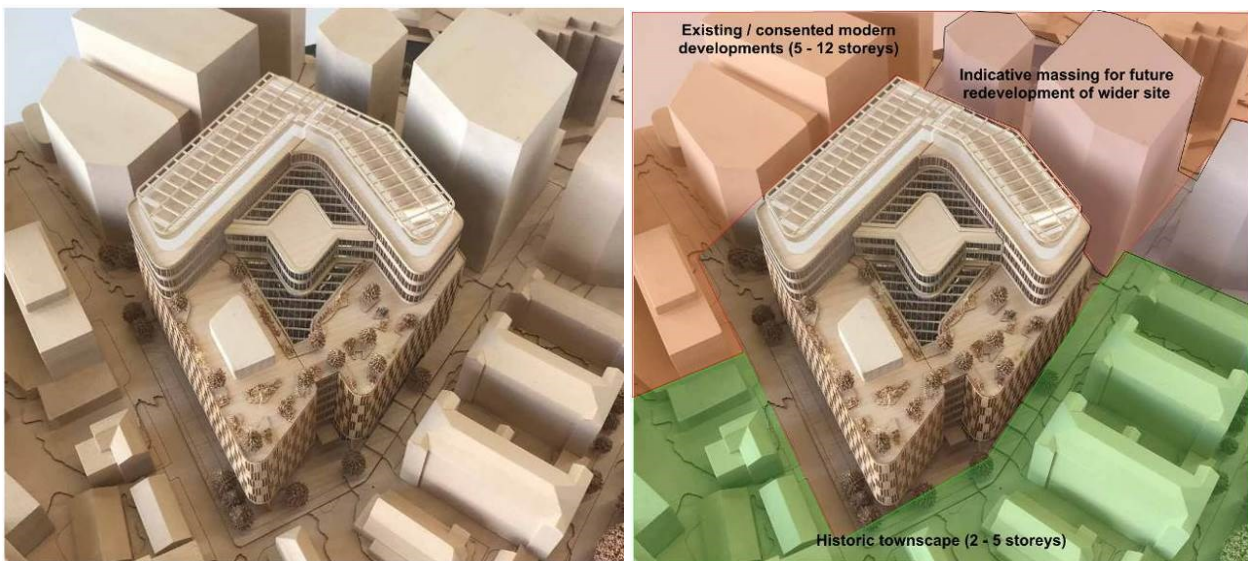


Figure 11 – Physical 3D of submission scheme showing distribution of height in response to context (view from the south)

13.43 Set backs are located at key locations of the building to further break up the mass and reduce its perception from street level. These are located on the south eastern corner, with a 1.5 m setback, and on the Granary Street and St Pancras Way corner, with a 300 mm setback on both sides. Especially in angled views (the only way the elevations will be read in reality), these set back provide important visual breaks in the planes of the elevations as well as steps in the sky line that create a sense of articulation and play that help to break down the massing.

13.44 In addition, datum lines have been incorporated via cornice-like features at first and sixth floor levels that create horizontal emphasis and help delineate the different sections of the building's mass. These draw the eye down from the roofline to the 'shoulder' of the building (where the crown element begins) at sixth floor level. This datum relates to the scale of the Victorian buildings south of the site and helps to create a more human scale and to reduce the perceived scale of the volume. Further articulation of the volumes is achieved through the recesses on the southwestern and northeastern corners, indicating the main building entrances and arrival points.

13.45 Along St Pancras Way, the proposed height is higher than that of buildings opposite, but it is considered acceptable due to the relatively wide nature of the street and the proposed building's widening at ground floor, creating a larger public realm on the street.

13.46 Along Granary Street, the building is at its tallest and therefore creates a more enclosed street, but it is the area most suitable for height in terms of heritage impact, response to the emerging context and natural light constraints. The setbacks at some locations and the façade treatment will help mitigate the impact and reduce the perceived sense of height, also allowing more light into the street.

13.47 Overall, the mass and scale is considered appropriate for the proposed use and for the area. It does not conflict with the neighbouring heights and responds to the constraints and characteristics of the surrounding buildings. Throughout the design process, the building form has improved through the increased articulation of volumes and further enhancement of setbacks.

Architecture and materiality

13.48 The building is designed with future proofing in mind to ensure it can be adapted to suit new internal layouts as well as a complete change of use. The façade design adopts a consistent language throughout the building but with subtle variations to respond to the context, further breaking up the mass and increasing the positive experience at ground level. The façade is composed of three main parts: a base, a middle and a crown, each with a different but complementary treatment. These are illustrated in the figure below.



Figure 12 – View of proposed building marked up to show the three main sections of differing treatments (right image highlighted)

Base

13.49 In response to the sloping nature of the site, the base forms two storeys to its main entrance in the south western side and is single storey to the north east side. Its treatment varies throughout the building to adapt to particular street conditions and internal uses. Curtain wall glazing is used for the more public facing activities

such as retail, café and education to allow views in and out and create an active frontage, while areas for back of house facilities and loading bays, particularly along Granary Street, are generally characterised by a continuous street of louvres. As discussed above even in the most functional parts of the Granary Street frontage, efforts have been made to add visual permeability and interest via the addition of windows and artwork.

13.50 The ground floor frontage varies throughout the building to respond the surrounding context and internal uses. Along St Pancras Way, the proposal reinstates an active frontage through a two-storey colonnade, creating an arrival area for the patient drop off and widening the public realm. Within the colonnade, the frontage is mainly glazed to allow views into the public facing rooms, with timber fins framing the panels, a stone plinth to add solidity at the base and a white rendered soffit acting as quiet background. A continuous spandrel panel is located midway between the lower ground and the ground floor levels and will contain artwork commissioned as part of the art strategy. A colonnade of similar characteristics is also proposed for the east elevation, facing the future KCCLP development, but is single storey in height. Although the base is of a more domestic scale to the north eastern side, at both entrances a double height canopy would ensure fitting generosity as well as adding navigation and providing shelter from the elements. Arrival into the main entrance spaces is designed to be as open and welcoming as possible, creating large areas of glazing that give direct view into active uses. The northeast corner is characterised by shopfronts for two retail units uses behind.



Figure 13 – Double height colonnade to St Pancras to improve navigation between drop off and main entrance. Indicative artwork shown.

13.51 The Granary Street frontage steps down following the changes in level and is mostly characterised by back of house and loading bay uses. To reduce the amount of blank frontage, windows looking into the loading bay and to a new meeting space, as well as laser cut artwork in front of louvres have been added and attempt to animate the façade. Final details of this artwork will be secured by condition.



Figure 14 – Street level frontage to Granary Street

Middle

13.52 The middle constitutes the larger area of façade and has a fairly consistent and repetitive pattern and proportions, using a combination of solid and transparent panels. The rhythm of the façade is achieved through a play of hit and miss panels, offset at every floor and creating a regular grid pattern. The introduction of louvre panels at the interstitial plant floor (sixth floor) also breaks the rigidity of the grid.

13.53 The concept for the building skin relates to that of adaptability. To achieve this, a system of curtain walling and cladding made of 7.2m bays is used for most of the building and allows for different infill panels to be inserted. There are three types within each bay: full height cream coloured terracotta panels made of different ribbed and glazed terracotta tiles, creating an effect similar to that of the local brick buildings, full height glazed panels with an opaque 1.2 m 'shadow box' to the lower portion, and aluminium louvres where the plant is located. Bronze aluminium fins of varying depths frame the panels, creating depth to the façade and referencing the tone of Victorian brickwork of the surrounding conservation area.

13.54 The use of different depths of fins, of ribbed terracotta panels and the distribution of solids and voids creates an interesting play of light and shadows on the façade, which evolves throughout different times of the day. The terracotta panels would be bespoke elements, designed to mimic the electromagnetic wave length. This reference to the use of the building and its foundations in scientific method would add character, interest as well as animation by changing appearance and tone through the day and year in response to the sun. This is illustrated below.

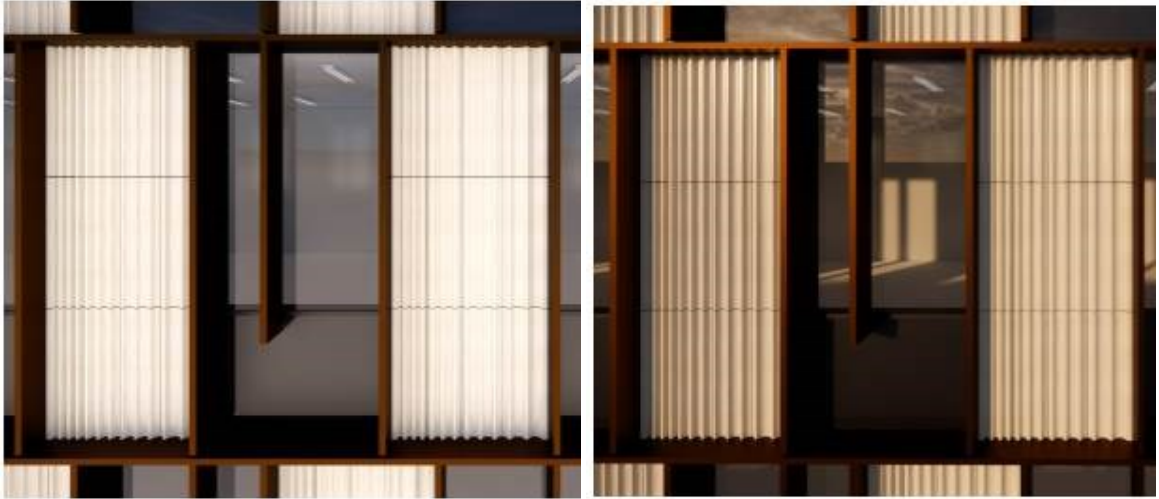


Figure 15 – Shadows studies of section of façade showing the changing play of light at 9am (left) and 7pm (right) on June 21st

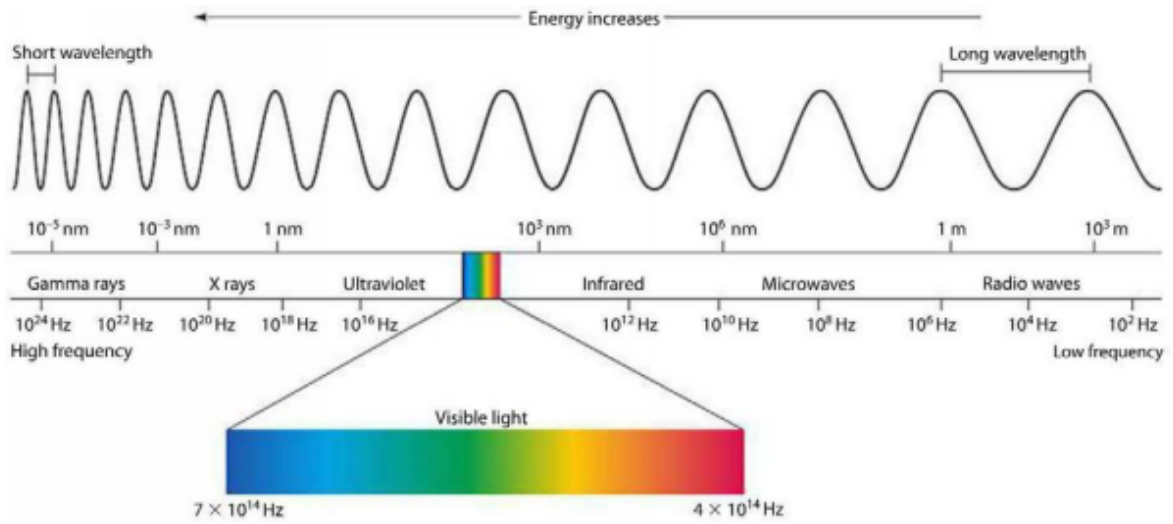


Figure 16 – Terracotta panels scalloped with compression and relief to mimic electromagnetic wave length integral to the study and practise of ophthalmology

Crown and skyline

- 13.55 Variety in the façade is introduced to soften repetition and break the rigidity of the pattern. This is achieved on the setbacks, where the façade becomes more horizontal through continuous bronze aluminium ribbed spandrel panel, while a vision glazing with shadow boxes above and grey aluminium fins create material and colour variations. At the sixth storey, where much of the plant is located, a visual break is created through the use of solid aluminium panels with integrated louvres. The horizontality and the shift in the rhythm of the cladding help reduce the perception of bulk of the building.
- 13.56 Sitting on top of the crown, a continuous ribbon of aluminium louvres hides the wide variety of mechanical plant located on the roof. A ribbon of aluminium louvres characterises the elevation. It is set back from the parapet line and hides the plant equipment, reducing its visibility from street level and neighbouring properties. A steel frame supporting photovoltaic panels floats above the aluminium screen. The atrium is covered by a glazed roof, allowing for daylight to penetrate into the space down to the ground floor and into the spaces facing the atrium.
- 13.57 Overall, the architectural design and materials of the proposed scheme are considered of high quality and contribute to integrate the building into its surroundings whilst simultaneously proposing a contemporary approach. Materials and detailing will be reviewed and secured by condition.

Townscape impacts

- 13.58 In order to make a fully informed assessment of the relative impacts to surrounding townscape and heritage assets from the heights and massing proposed, a Townscape, Heritage and Views Impact assessment has been provided. During pre-app discussions, physical and digital 3D models were also provided to test and iterate to determine the most appropriate distribution.
- 13.59 The submitted views analysis has tested the proposed massing via the use of accredited views analysis carried out by specialist consultants. During pre-app, locations and position for testing were agreed with officers, including over 20 locations from the surrounding area. After submission, further testing to include additional winter views was also provided. For each of the key views, the existing condition is compared to: a) a situation with the proposed development; b) with the proposed development along with consented scheme on surrounding sites; as well as c) the cumulative impacts including the redevelopment of the wider hospital site based on the illustrative parameters plan provided by KCCLP/C&I.

Proximal views

- 13.60 The most important local views of the proposed development are those looking north and south along St Pancras Way, west along granary and from within the hospital in the south east.
- 13.61 The view of the development's southwest corner, when coming north along St Pancras Way, is framed by the planned Ted Baker development to the north and the old workhouse buildings to the south. It is characterised by a prominent

building corner, with the frontage on St Pancras Way to the west and the building's southern entrance to the right. In this view, the active frontage is maximised at ground floor through the glazed panels and the strip of artwork, as well as the colonnade spanning across the whole St Pancras Way façade, also increasing the width of the street and area of public realm. The articulation of the blocks helps visitors with the navigation of the site, with the entrance being perceived through the building recess and a pedestrian priority environment to the south. The taller building elements are only perceived at the back, on the corner between Granary Street and St Pancras Way.

- 13.62 Approaching the Oriel from the north along St Pancras Way, the building's northwestern corner is highly visible and creates a visual marker. The architectural treatment and the setting back of the massing above the sixth/seventh floor create visual variation and reduction of perceived bulk as approaching the building at street level. The St Pancras Way façade is visible while the Granary Street one is obscured by the permitted UBB development. An area of laser cut panels and the colonnade animate their respective street frontages.



View 1 – view from north west corner, looking east along Granary st

- 13.63 The view from the north east is defined by the prominent corner of Granary Street and the planned new square adjacent to the KCCLP development. The building here is at its highest, with no set back on the corner but with the ground floor active shopfronts and with the north entrance to the building being visible and articulated through a lower element and a recess. The new square is visible and provides new and improved public realm. This would be provided as part of this scheme, though it would be expanded as part of any future KCCLP redevelopment. Granary Street is perceived as an enclosed street environment, with the laser cut panels animating the ground floor.



View 2 – view from north east on Granary st

13.64 The view from the south east corner is considered one of the most sensitive within the development as it directly relates to the old workhouse buildings and St Pancras Gardens. The cornice and set back at seventh floor lower the perceived scale of the development. The use of the bronze fins and solid terracotta panels create a direct link with the Victorian brickwork. The corner is surrounded by new public realm which improves the experience at street level.

Distant views where noticeable changes are experienced

13.65 Longer views of particular interest for the assessment include from further south on St Pancras Way, from within the St Pancras Gardens, the Regents Canal and Goldington Crescent open space, and from Royal College Street.

13.66 When looking south from further up St Pancras Way, the building will be visible but will be mostly obscured by the permitted UBB development on the Granary Street façade, with the taller northwestern element visible and indicating the presence of the building. The St Pancras Way elevation is visible and considered to positively contribute in activating the frontage along the street at ground floor, replacing a blank brick wall.



View 3 – proposed massing from north along St Pancras way (proposed massing obscured by massing of consented scheme highlied in red)

13.67 From St Pancras Gardens the building will be visible, particularly during winter months when the trees will not screen the view and the building is exposed. This view is challenging as the scale and character of the area will be changed, especially close to the old hospital buildings, but it is partly addressed through the datum line and setbacks and the proposed materiality of the scheme. Further consideration is set out in the heritage section below.

13.68 From Goldington Crescent Gardens, the new building appears behind the Victorian buildings south of the site, changing the scale and filling a large portion of the view. The southern façade is the most visible from this point, with the setback volumes appearing in the background. It is considered the scale of the development to be prominent on this view but the articulation of volumes reduce the perceived bulk and the deep bronze fins relate to the brick and terracotta colour of the older hospital buildings. Further discussion is also set out in the open space section of the report.



View 4 – proposed massing from Goldington Crescent

13.69 From the other side of the canal at the top of the steps along Camley Street the view will be modified considerably, but the proposed building will be filling the gap between the 101 Camley Street tall development and the permitted UBB development, being all of similar scale. Once the KCCLP development comes ahead, the Oriel building will be mostly obscured. From further north along the tow path the building will slightly appear above the existing UBB on the view southwards along Regent's Canal but will be completely obscured once the permitted UBB development is built. Further consideration is set out in the heritage section below.



View 5 – proposed massing from opposite side of Regents Canal (massing of consented UBB also shown in red)

13.70 The building would be visible from parts of Royal College Street forming the backdrop to the Travis Perkins building. The tall element at the Granary Street and St Pancras Way corner would be visible, modifying the roofscape. However when read against the existing / consented scheme at Travis Perkins and the UBB site this would not appear out of context.

Design summary

13.71 Overall the proposal is considered to represent a high quality, contextual design that responds to the site's characteristics, the surrounding pattern of development as well as the future use of the building itself. Its layout and the location of entrance and servicing areas have been robustly considered and are in the most appropriate locations. They also respond to future pedestrian desire lines and would successfully join up a network of routes that would transform the permeability of the site and wider area. The massing and heights have been shaped to respond to the local context, stepping down to the south to present a more neighbourly relationship with the key heritage workhouse buildings and stepping up to the north to denote key corners and responds to the new Travis Perkins, UBB and Camley street developments. This massing has been articulated further through sensitive detailing and treatments that would be robust, add interest and character and reflect the use of the building.

(13d) Heritage impacts

13.72 As outlined at the beginning of this chapter, the development has the potential to affect a number of designated heritage assets. The following section will consider each in turn, before a summary of overall impacts is provided.

Impact to the character and appearance of the Kings Cross St Pancras conservation area

- 13.73 As detailed at the beginning of this chapter, the site sits within sub area one of the conservation area. Of the seven buildings on site, two are regarded as positive contributors along with part of the boundary wall, two make a neutral contribution and one makes a negative contribution to the special character and appearance of the conservation area. The proposal would involve the demolition of all of these buildings and the replacement of a single building of greater scale.
- 13.74 Workhouses (and hospital sites) often historically comprise a series of building of differing functions which together create a functional whole. Due to the perceived hierarchy of functions, often a gradation of architectural detail is afforded the different classes of building (as the case at St Pancras) where the more work-a-day buildings are more utilitarian in design. Similarly, the former workhouse use of the site necessitated a defensive boundary treatment. Whilst generally plain, the tall perimeter wall contains varying brick treatment, with sections containing decorative piers and features.
- 13.75 At the St Pancras site, the chapel and workhouse/ward buildings located along the southern perimeter (outside of the development site) are the most decorative, with architectural style and solidity typical of the period. Conversely, the kitchen and laundry/ boiler room buildings (within the development site) are plain and more utilitarian, but still visually engaging. The assembly make for a visual coherent and significant group and an important part of the conservation area. Therefore as a group, these nineteenth century workhouse and ancillary buildings have of greater significance as a collective than as individual buildings.
- 13.76 The development would fully avoid the heritage buildings of greatest architectural quality and highest prominence in public views from the hospital site (the site outside the application site). However, the development would still involve the demolition of three positive contributors, and the loss of the historic buildings from the centre of the site and boundary wall will undoubtedly erode the visual historic interest and nineteenth century institutional character of the hospital as a whole. Furthermore, given the scale and design of the redevelopment, the proposed building will have a dramatic impact on the character and appearance of this part of the conservation area.
- 13.77 Although analysis in the design section shows that in local views, the building would not appear out of context when read against surrounding development sites, it would still appear highly dominant against the retained hospital buildings on site. To the south, a drop from 10 to 7 storeys improves this relationship. However, due to its proximity, height and massing, it will still dominate the setting of the retained historic buildings and remain prominent in all views from within the site. Whilst the architectural treatment has been designed to form a calm backdrop to the retained workhouse buildings, reflecting their tonality, it would still appear in stark contrast to them.



View 6 – proposed massing (blue) read against the retained workhouse buildings when viewed from the south

13.78 Conversely, the development would involve the removal of a building which currently detracts from the character and appearance of the conservation area and replace it with a building of high design quality.

13.79 In terms of use, the proposal would also allow for a re-provision of medical uses for which this site has been associated with for at least 100 years. This is positive and would further the legacy of the St Pancras Hospital, bringing with it a new facility designed to be robust and with longevity in mind. Given the requirements of the SALP, the development would allow for the optimal viable use to be secured, which would also represent a continuation of the historic legacy of the site. Given the level of commitment from the applicants, this civic institution would remain and operate on site for the long term, further cementing its significance.

13.80 On balance, it is considered that the development would result in ‘less than substantial harm’ to the special character and appearance of this sub-area of the conservation area. A full heritage balance, in line with the requirements of NPPF para.196, will be provided at the end of this chapter.

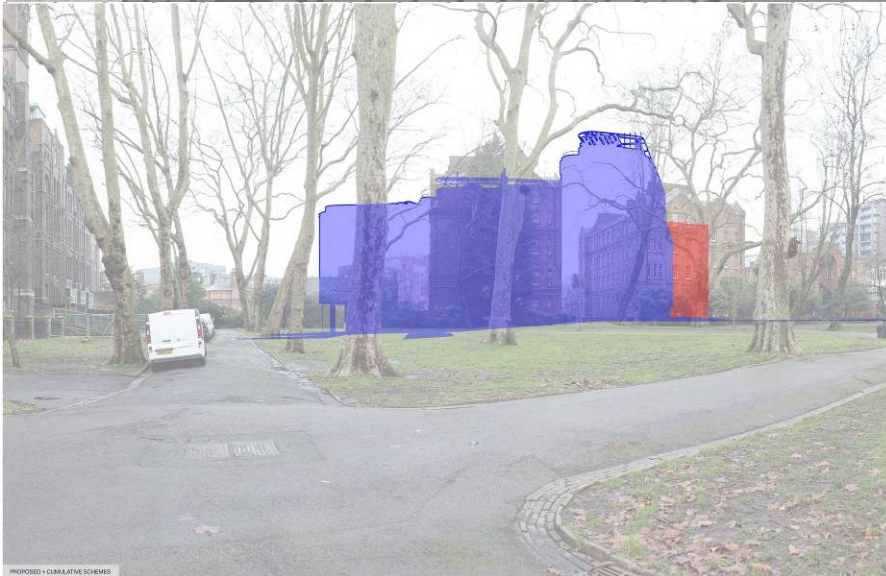
Impact to the character and appearance of the Regents Canal conservation area

13.81 As discussed in the townscape section, the proposed development would be readily visible in Westwards views from a section of the towpath. However, given the separation distance from the development site and the boundary of the conservation area and datum heights of the new developments at Camley St (101-103) and the UBB site, the proposed building would sit within the emerging townscape and would not project into the newly established skyline to appear overly prominent in these views. The character of the conservation area between the St Pancras and Camden Town basins is highly diverse and has evolved greatly since it was first designated. The design of the proposed building would also not

appear incongruous within this context, nor affect the special character of the conservation area. On balance, whilst being visible from within it, it is not considered that the proposed development would cause detrimental impacts, preserving the setting and special character and appearance of this nearby conservation area.

Impact to setting of St Pancras Old Church (GII*), Gardens (GII) and listed structures and monuments within it (GI-II)

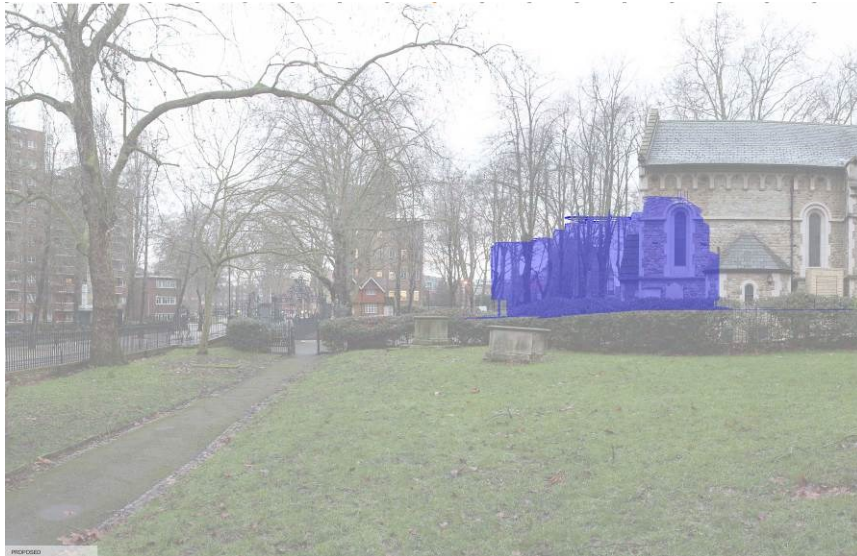
- 13.82 Numerous views from locations in and around the gardens have been tested to determine the level of visual impact upon them and the other heritage assets within them. This includes testing against the setting of the Old Church as well as various listed monuments and features.
- 13.83 The proposal would not directly encroach into or abut the designated gardens and would be physically separated from them via the retained workhouse blocks, but would affect the skyline that currently forms the backdrop in these views. Views towards the proposed building would be dynamic, changing as one moves through the space. The degree to which the building would be visible diminishes the further south you travel. Furthermore, as the majority of the mature trees within the gardens are deciduous, the degree of prominence would also vary throughout the year. Accordingly, additional winter views analysis was prepared and submitted to inform this assessment. It is noted that the access to the church and gardens is prohibited during the hours of dark when the gates are locked.
- 13.84 The submitted analysis shows that, whilst being readily visible from the gardens during winter months, the separation distance would mean that the proposed massing of the lower wings would generally sit within the existing datum formed by the roofs of the retained workhouse buildings. Whilst the skyline may be raised as a result of the taller elements, this would still sit well below the datum levels formed by the rear and side of the South Wing building, which also frames the gardens in these views. It is also noted that the consented scheme for the UBB site, in addition to the new building at 101 Camley Street would also form a part of this backdrop and that the proposed building would fit within this.



Views 7 and 8 – proposed massing (blue) in winter views from the gardens, read behind the retained workhouse buildings and as part of the sky line formed by these, the South Wing and the consented development to the UBB site (red) (summer views mostly obscured)

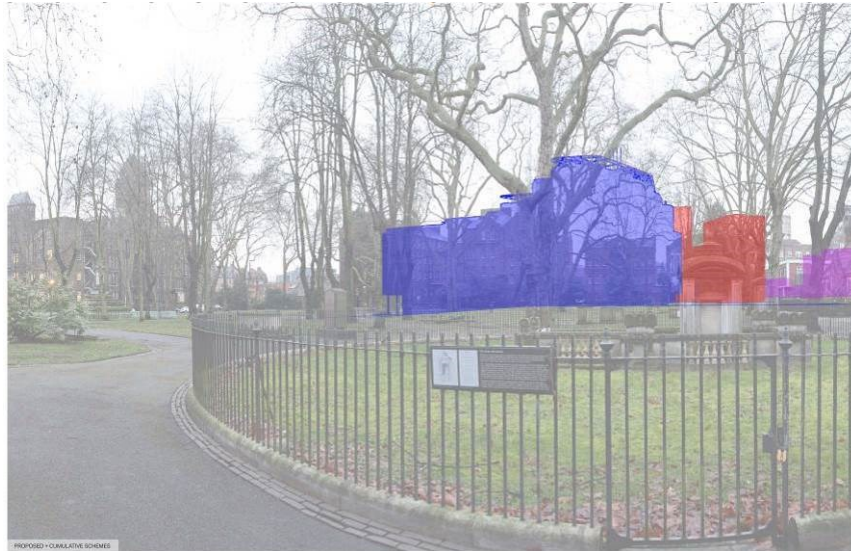
13.85 As a result, it is not considered that the proposed building would appear visually overwhelming in these views or overbearing. Whilst the change would mean that the workhouse buildings would be framed by the backdrop of the new building, rather than the sky, this is not intrinsically related to the significance of the gardens or other assets within it. The proposal would also not present a solid backdrop in these views, framing only about half the width of the gardens and presenting a staggered roofline. As a result, the retained workhouses and south wing buildings would maintain their imposing character and continue to be the defining features framing views looking north. It is noted that during summer months, the majority of the proposed building would be obscured in all views other than from along the most northerly footpath as a result of the tall and dense canopy of foliage. The development would fully maintain the integrity of the landscaping of the gardens themselves, which is the principal feature of their significance other than their historic interest (also not affected).

13.86 The same would apply to views adjacent to the Old Church. Whilst in the summer, views would be obscured, the new building would be visible during winter months. However, the proposed building would not appear overly dominant in these views and would be read against the existing backdrop formed by the retained Victorian workhouse buildings within the hospital site. This change would not affect the historical significance of the building, and the more immediate setting of the open and verdant church yard within which it is generally appreciated would be unaffected.



View 9 – proposed massing (blue) in winter views from the Old Church, read behind the retained workhouse buildings (summer views obscured)

13.87 Similarly, for the various monuments, tombs and structures within the gardens (including the railings), the proposed building would be visible in northern winter views but for the reasons set out above, this would not undermine the significance of these assets, which would still be read as siting within the open and verdant gardens, amongst the historic church yard and mature trees. Where assets are also of architectural merit (i.e. the Burdett-Coutts Memorial Sundial and Tomb of Sir John Soane), the presence of the new building in the backdrop in winter views would not affect their integrity or special significance.



View 10 – proposed massing (blue) in winter views from behind the Sir John Sloane memorial, sitting behind the retained workhouse buildings (summer views obscured)

13.88 In light of the above, the proposed development is not considered to affect the historical or architectural significance of the old church, gardens or designated assets within it. The peaceful and verdant character of the gardens would be maintained, with no change in their historic appearance or layout. The sense of openness to the pleasure gardens and setting of the church and various listed structures would be preserved, even during winter months when the proposed building would be visible. The proposed building would also be visible in northern views from listed monuments, however the increased separation distance would further attenuate its visual prominence meaning that their setting would not be harmed.

Impact to setting of St Pancras Coroner court (GII)

13.89 The new massing would be visible above the new extension in views from south along Camley St, but as set out at the beginning of the section the modern extensions to this building to its east do not contribute towards its special architectural or historical significance. Therefore, this designated asset is only appreciated from the footpaths within the gardens themselves. Whilst located further north than the Old Church, the degree of visual impact upon the setting of the court would remain comparable. That is to say, the proposed building would not directly encroach into views of the court but would affect the skyline and backdrop to them. This is not, however, considered to affect the significance of the listed building, including its setting. As an ancillary building to the main function of the former burial ground, it is notably smaller than the surrounding Victorian institutional buildings of the hospital site. This relationship would be maintained, as would its immediate setting within the gardens themselves. Similarly, the proposal would not affect the historic significance of the building.

Impact to setting of no.5-16 Goldington Crescent

13.90 As discussed in the beginning of this chapter, the significance of this terrace primarily rests in their integrity as a surviving group and architectural detailing, as

well as the historic interest in illustrating the urbanisation of the area. As a result, the heritage asset is most prominently appreciated in views from Goldington Crescent / Pancras Road looking south west. In these views the proposed development would not be visible. Whilst there may be an angled view from the top of Goldington Street that would include this terrace and the proposed development, given the separation distance this would not be considered to materially affect the setting of the terrace.

Other nearby listed structures

- 13.91 Located further north along St Pancras Way (near to the former mail sorting office) is an original Penfold pillar box that is GII listed. The setting of this asset is not of relevance to its significance, which includes its historic and architectural value. Notwithstanding, due to its siting relative to the application site the existing and consent UBB schemes would obscure views toward the proposed building meaning there would be no affect to significance.
- 13.92 Similarly, the GII cattle trough located opposite the end of Royal College Street is listed due to its historical significance. The proposed development would not materially affect the significance of this asset.

Archaeology

- 13.93 As set out earlier in the chapter, the site is in close proximity to but sits outside of a designated Archaeological Priority Area (tier 2). Whilst outside of the APA, given the historic development of the area and use of the development site as a workhouse, officers consider it likely that there may exist remains within the development site of archaeological interest. Whilst it is noted that the whole hospital site has historically been cleared and rebuilt, any remaining assets could further our understanding of the development of the area, and there is a strong possibility of human remains given the original workhouse use.
- 13.94 A response letter received from GLAAS (Greater London Archaeologic Advise Service) would support this position and conditions are therefore recommended for the submission of a written strategy of investigation prior to the commencement of works. This will include the need for investigative trials to be undertaken in the initial, enabling phase of works. The condition will also specify that should the results of these investigations show there to be a likelihood of remains of historic interest, further mitigation will be required.
- 13.95 Further to the above, given the value of the existing hospital buildings as a collective whole, it is also recommended that a further condition be applied that would also require the applicants (and C&I) to undertake a level 4 archaeological recording of the existing site and its buildings. This will ensure that a record of the historic significance of the hospital as a group of separate buildings functioning as a whole is preserved for future research.

London View Management Framework View

13.96 The submitted views analysis has also considered the impacts of the proposed building on the aforementioned protected vista from Parliament Hill towards St Paul's that crosses over Granary Street to the east of the development site.

13.97 This shows that the proposed building would in no way erode or obstruct the view towards the cathedral, but would be noticeable as part of the middle-ground roofscape. In this context the building would sit within the established roof and townscape and would not appear intrusive nor affect the composition of the view as a whole. The new massing would partially obscure part of the view towards the modern roof to St Pancras Station, but the view towards the clock tower and Midland hotel would remain unobscured. The development would therefore not impact this protected view and would remain in accordance with the requirements of NLP policy HC4.

Overall heritage impact

13.98 The above assessment has found the proposed development to cause less than substantial harm to the special character and appearance of the Kings Cross St Pancras conservation area. The development would however be considered to preserve the setting and special character and appearance of the Regent's Canal conservation area and the historic and architectural significance of all listed buildings, parks and structures within the local area. Subject to the applications of conditions recommended by GLAAS, it is also not considered that the proposal would cause harm to the archaeological interest of the site.

13.99 The identified harm to the Kings Cross St Pancras conservation area is considered to be less than substantial when considering the character and appearance of the conservation area as a whole. However, the harm identified consists of various aspects including

- The loss of two buildings and one wall that positively contribute to the CA;
- The loss of integrity of the hospital site as a whole and erosion of its historical interest; and
- The visual impact upon the retained buildings within the hospital site

13.100 In accordance with para.194 of the NPPF any such harm should require clear justification prior to falling to a weighing exercise.

Justification for harm and feasibility

13.101 The proposed development would represent a strategically important, long term investment in critical health and social infrastructure for London. Prior to arriving at the St Pancras Hospital site, Moorfields considered a range of other sites and options, including extending their existing premises as well as a collection of sites in central London. Each of these options were found to offer less benefits in terms of ease of accessibility for patients and proximity to other key institutions within the Knowledge Quarter. In addition, by developing this site the existing facilities at City Road can continue to operate until the new building opens,

preventing any loss in provision of essential services. The potential options were the subject of public consultation, which showed there to be a strong preference for the redevelopment of the St Pancras site.

13.102 It is also noted that the whole hospital site has been included within the Council's SALP since at least 2013, with comprehensive redevelopment being supported to help deliver the Local Plan. The St Pancras Hospital site is highlighted as being of critical importance for the delivery of the Knowledge Quarter and also for creating a gateway into the new neighbourhood of Camley Street. Another key aspiration is for improved pedestrian routes through the site, which would directly be prevented by the existing perimeter boundary treatment. The low rise, detached collection of individual buildings within the development site would not present opportunities for reuse in a manner that would allow the realisation of these policy aspirations. Their demolition in order to facilitate optimisation of this key site within a highly accessible location is therefore considered justifiable.

13.103 In terms of the resulting visual impact of the proposed building, throughout the pre-app process officers and the design team have continually pushed to reduce the overall quantum of development proposed as far as practicable. As a result, the design team have made savings through shared facilities and greater collaboration that would mean that the proposed development would actually have a smaller internal area than the current facilities at City Road but still offer a drastic improvement in the facility's overall offer. These negotiations have led to an overall reduction in internal area of 15% compared to the existing facilities in Islington. The proposal is therefore considered to represent the minimum area that is required for the reprovision of the existing facilities from City Road. Furthermore, as detailed in the design section it is also noted that the distribution of massing and heights to provide this quantum have been carefully shaped to respond to local context and reduce the visual impact upon the non-designated heritage assets to the south. Officers consider that these design moves have acted to reduce the level of harm as far as practicable whilst maintaining a viable scheme that fulfils its intended purpose.

13.104 Overall, the justification for the proposed demolition and development is clear and convincing. The location of the proposal is ideal for the intended use, with other less suitable ones discounted and the final decision based upon the findings of public consultation with patients and staff. The options discounted during the course of this public consultation did not achieve as significant public benefits and would have been less accessible for patients and staff members. The fallback of trying to adapt the existing buildings is considered to result in fewer public benefits, and is not seen as a reasonable viable alternative as the development would not be delivered. Furthermore, it was noted that the design of the new building has acted to alleviate its visual impact upon the conservation area.

Weighing of public benefits against the heritage harm

13.105 The identified harm caused (which would be less than substantial, as outlined above) to the character and appearance of the Kings Cross St Pancras CA has

been given considerable importance and special attention in officers' assessment of the scheme.

13.106 NPPF in para 201 requires harm to be measured against the 'contribution to the significance of the Conservation Area or World Heritage Site as a whole'. In this instance, Officers consider that the harm caused to the significance of this part the CA (sub area 1), through the demolition of the kitchen block, Camley centre and perimeter wall, the loss of integrity of the hospital as a whole as well as the visual impact to the setting of the retained buildings within the hospital. This is considered to amount to 'less than substantial' harm overall and result in a limited negative impact on the character and appearance of the CA as a whole. Following this established level of harm to part of the CA, the NPPF para 196 states that:

'Where a development will lead to less than substantial harm to the significance of a designated heritage asset [the Bloomsbury Conservation Area], this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.'

13.107 The law requires that less than substantial harm must be afforded significant weight in the planning balance and the NPPF states that this may only be outweighed where there are sufficiently substantial public benefits delivered by the development. It also requires alternatives to be considered that might avoid the harm.

13.108 In this instance a convincing case for the development to be in this location has been made; with the site offering the optimal mix of ease of access for patients, local amenity and ability for the institution to benefit from opportunities for collaboration with other knowledge quarter institutions. It was also noted that the Council has designated the wider site for redevelopment and that this is integral to the delivery of the Local Plan, wherein the policy aspirations necessitate the demolition of buildings and perimeter wall to be deliverable. Fully eliminating the harm would require the retention and reuse of detached, 2 storey buildings. This would not accord with the overarching requirements of LP policy G1 for sites in highly accessible locations that are identified for development to be optimised for the delivery of growth.

13.109 The proposed new facility, being a joint initiative between Moorfields Eye Hospital, UCL Institute of Ophthalmology and Moorfields Eye Charity, would bring together world-leading eye care, research and education under one roof and represent a £200m investment in the heart of the Borough. It would deliver substantial and wide-ranging public benefits. These include international benefits to medical research through finding treatments for eye diseases that affect a significant number of people in the UK and worldwide, major benefits to the economy would result from reducing the cost of eye diseases and allowing for more independence, and by maximising links between medical research and commercial opportunities. This is within the context of an increasingly aging population, with older people having a much higher propensity to suffer from life changing eye conditions. These public benefits are considered to be compelling and substantial, and outweigh the less than substantial harm to the CA on their

own. Notwithstanding, the scheme would also provide further benefits, such as to the local economy and labour market, improved local walking routes and contributions towards strategic infrastructure such as a new bridge to the canal.

13e) Overall design and heritage conclusion

13.110 The new building is considered to represent a high quality, contextual response to the site and to lead the way for a more comprehensive redevelopment of the wider site that will follow. The development hereby proposed would contribute new high quality publically accessible routes and public realm. It would maximise opportunities for active frontages and uses and open up the site to the public for the first time in its history.

13.111 The buildings within the wider St Pancras Hospital site that are considered to make the greatest contribution, including the workhouse buildings and chapels would not be affected by the development. Notwithstanding, the development would result in the demolition of seven buildings and the perimeter wall, some of which are positive contributors. The proposed demolition and new building would lead to impacts on the Kings Cross CA; however, their loss is considered justified and leads to other significant public benefits outlined above. Nevertheless, there would be some overall less than substantial harm to the CA. No harm was identified to other heritage assets in the local area, including the listed St Pancras Old church, gardens and memorials within it.

13.112 Giving special attention and affording the less than substantial harm considerable importance and weight, officer are nevertheless of the view that the public benefits of the scheme are sufficiently substantial and compelling to outweigh the 'less than substantial harm' caused. Officers therefore support the proposed development due to the very substantial public benefits brought the scheme as a whole.

[Link to assessment content table.](#)

14 Open space, Landscaping, Trees, Nature Conservation and Biodiversity

14.1 This chapter assesses the development's contribution towards open space and public realm as well as an assessment of the impacts to the natural environment. The chapter is structured as follows:

- a) *Impacts to public open space*
- b) *Provision of open space*
- c) *Public realm and landscaping*
- d) *Trees*
- e) *Nature conservation and biodiversity*
- f) *Conclusion*

14.2 Camden Local Plan policy A2 (Open Space) seeks both to protect and improve designated open spaces within the borough as well as secure appropriate

contributions towards the provision of new or enhanced open spaces in order to support the Borough's growing population. Policy A3 (Biodiversity) seeks to both protect and enhance sites, trees and vegetation of nature conservation value as well as securing biodiversity net gains through new developments. These local plan policies support those set out within chapter 8 (green infrastructure and natural environment) of the New London Plan.

14.3 There are no areas within the application site that are designated as open space (public, private or local green space), or due to their importance for nature conservation value. This is also true of the whole of the wider St Pancras hospital site. The application, and hospital sites are also not within an area of identified open space deficiency as defined in the Local Plan. Notwithstanding, there are a number of designated open space and nature conservation assets in the local vicinity, including:

Designated open spaces

- St Pancras Gardens (public open space)
- Goldington Crescent (public open space)
- Regents Canal (public open space)

Nature conservation

- St Pancras Gardens (SINC, borough level II)
- Regents Canal (key habitat corridor and metropolitan level SINC)

14.4 In addition, there are a number of mature trees within the application site including one that is the subject of a tree preservation order. There are also areas of amenity lawns and vegetation, as well as older buildings that have habitat potential within the application and wider hospital sites. The Camley Street local nature reserve and Gasholders Park are situated 220m and 185m away from the application site respectively and are both separated from the site via the elevated National Rail tracks. It is therefore considered that both of these sites are far enough away for them to experience no adverse impacts.

14a) Impact on Public Open Space

14.5 The development would not directly encroach upon or cause a loss of any designated open space. However, as well seeking to protect against physical loss/erosion, LP policy A2 also seeks to protect the setting and character / openness of designated public spaces. A review of the visual impacts of the proposed developments upon protected spaces in the local area is given below.

St Pancras Gardens

14.6 Consideration of the visual impact to the designated gardens is set out in the previous chapter. It was concluded that the proposed new building would affect northern views from within the gardens by infilling a section of current sky to form a back drop to the retained workhouse buildings. However, it was also concluded that due to the separation distances maintained and fact that the massing would be read within the skyline formed by the consented development at the UBB site and more proximal Victorian buildings, this would not affect the sense of openness

within the gardens themselves, which is part of their significance. For the same reasons, it is not considered that the new building would detrimentally affect the setting of these gardens and that their special amenity value would be preserved. As the gardens are to the south of the development there would be no overshadowing affect or loss of natural light.

Goldington Crescent Gardens

14.7 The lawns and mature trees of this oval shaped garden set off the attractive 19th century terraced crescent along its edge. As discussed in the previous chapter, the proposed building would be readily visible in north eastern views from within these gardens. Its mass would also dramatically change the skyline in these views, with a loss of sky and its replacement with the massing of the new building to form a backdrop in these views. However, given the separation distance this mass would be read within the rooflines of the South Wing and Goldington buildings, which would remain much more dominant in these views. As a result, despite being readily visible the new building would not affect the sense of openness nor detract from the peaceful and verdant character of the gardens, including its setting. As the gardens are to the south of the development there would be no overshadowing or loss of natural light.

Regent's Canal

14.8 As well as a conservation area and habitat corridor, the Regent's Canal is also an important public open space that provides amenity to the Borough and waterway's population. Consideration of the visual impact to the designated open space is set out in the previous chapter. It was concluded that the proposed new building would be readily visible in westward views along stretch of the tow path, but that in these views the new building would be read in the context of the more proximal developments at 101 Camley Street and the consented scheme at the UBB site. As a result, the proposed building would sit within this establish roofline, infilling the space between with a related datum height. Given the separation distance from the proposed building and the canal, this is not considered to appear overbearing or cause a loss of sense of openness, nor be of detriment to the setting of the open space. It is also noted that views to the new building would likely be obscured in the future when the remainder of the hospital site comes forwards. The natural light assessment shows that no part of the tow path would become overshadowed. Two small areas on the Western bank would have some slightly shadowing during winter months, though neither are publicly accessible and this would not undermine the quality of the space.

Summary

14.9 In summary, the development would cause a notable changes in certain views from within the various surrounding open spaces, altering the skyline that forms a backdrop in these views by filling what would have previously been areas of open sky. However, in each of these views the proposed massing would be read against more proximal, existing buildings and would remain within the established skyline formed by existing or approved developments. As a result, the new building would not appear to appear overbearing or to adversely affect the sense of openness of

these surrounding open spaces, including their settings. The character of these spaces, particularly the secluded quality of St Pancras Gardens and Goldington Crescent Gardens would therefore be preserved. It is also noted that the view from Regents Canal will be affected by the ongoing implementation of the mixed use scheme on 2-4 Pancras Way together with future development of the wider hospital site.

14b) Contributions towards Open Spaces

- 14.10 The Local Plan requires an 'appropriate contribution' to open space, with priority given to publicly accessible open space. Policy A2 gives priority to securing new public open space on-site, with provision of space off-site near to the development acceptable where on-site provision is not achievable. CPG Public Open Space states that developments over 1,000m² (GIA) of either commercial (including research and development in the former 'B1b' use class) or higher education uses should make contributions to address the needs they generate. However, health care (former use class D) uses are not listed as having to contribute towards open space provision.
- 14.11 The development would result in a significant increase in employment floorspace, meaning that the population of staff members, students, visitors and patients using the site will be increased. This would include the introduction of 1980sqm of new higher education space (GIA), 8050sqm of research floor space and 303sqm of commercial space. Policy A2 part m. applies a standard of 0.74m² per occupant for commercial developments, including higher education, in terms of on-site provision.
- 14.12 The open space requirement for the development is calculated by multiplying the standard of 0.74m² (per occupant) by the amount of floorspace required per worker. There is no specific employment density for higher education uses; however, following the guidance in CPG Public Open Space a density of 1 job per 10m² (NIA) for office workers is considered acceptable in this instance. The NIA is calculated as 85% of the GIA. The expectation for open space provision set out in the policy is therefore as follows:

Uplift in higher education, research and commercial floorspace (sqm GIA)	+10,333
Uplift by NIA (85% of GIA)	+8,783
Relevant employment density	10 employees per sqm
Uplift in employees from these elements of the scheme (NIA/10)	878
Open space policy requirement (0.74sqm x 878)	650sqm
New open space provided	2,048sqm

- 14.13 The proposed development would deliver an area of public realm well in excess of the policy requirements. This area excludes the rooftop garden (a further c.1400sqm) as this would be for the exclusive use of staff members and students. The scheme would involve the creation of a new landscaped walking route and

open space through the hospital site, with areas of planting, seating and cycle parking, as well as a semi-private roof garden and relandscaped footways to adjacent streets. When looking at the area of landscaped public space only, this would involve a total area of 2,048sqm of new public space, far above the policy requirement. This figure also excludes the areas provided within the atrium and rooftop garden. The area of landscaped new open space is shown in the figure below.

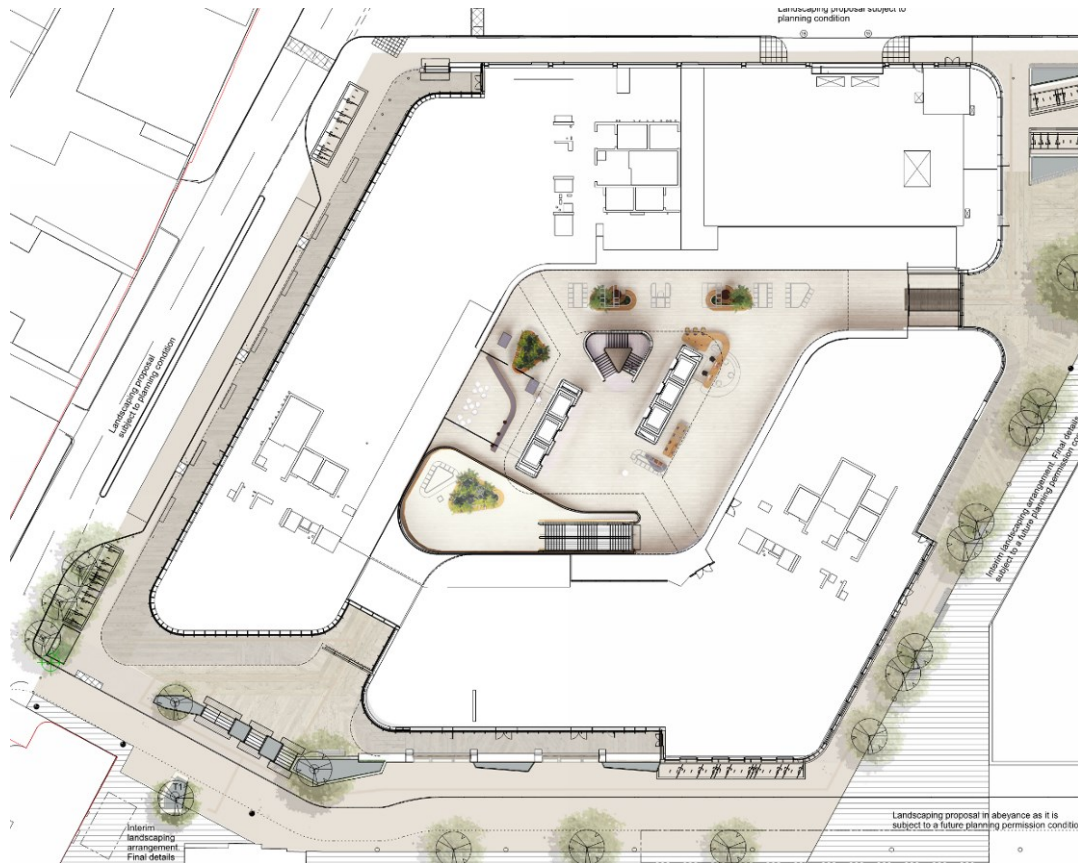


Figure 17 – landscaping plan showing areas of new publicly accessible open space / walking route to be provided (note options for future development of wider site shown indicatively to the east)

14.14 Officers recognise that this would be an accessible and highly valuable as space located in the centre of the hospital site, vastly improving the pedestrian experience travelling across the site and through to the mixed use scheme at 2-4 Pancras Way as well as the new canal footbridge. Further consideration of the character and quality of this route and landscaping is provided in the following section. On this basis, the proposal would provide an acceptable amount of public open space on-site, subject to it being secured via a S106 legal agreement to ensure that it remains publically accessible at all times and for the route running through the building to remain public accessible during regular hours (out of hours restricted for safety reasons – see para.24.6).

Open space conclusion

14.15 Overall it is considered that the proposed development would preserve and protect the sense of openness, character and amenity value of the various public open

spaces within the local area. In addition, it would contribute new public walking routes and public realm that would far exceed the requirements of policy. In addition to this, a rooftop garden would provide amenity for the staff and students of the facility, providing a peaceful area for rest bite.

14c) Public realm and landscaping

- 14.16 The public realm and landscape elements brought forward by the proposals relate to the edges of the building, the internal atrium space and roof top terrace.
- 14.17 On St Pancras Way the drop off and pick up space is framed by new tree planting to its south to provide a more attractive point of arrival and departure to the site. Planters are provided along the east-west route at the entrance integrated with seating and steps to negotiate the change in levels to add to new street planting along the east-west route enhance its attractiveness and use.
- 14.18 New tree planting is proposed for the north-south route along with seating with a larger canopy tree and planters in the proposed square at the north east entrance. Granary St has been investigated for additional tree planting however due to underground services further planting is not possible to replace the small trees in this location. Instead, new mature trees would be planted along St Pancras Way to soften views of the building, provide a sense of generosity to the street for pedestrians and provide shading to the public realm. These are discussed further in the following section. In addition to planting to the external landscape planting is carried through the atrium space linking the outdoor and indoor spaces.
- 14.19 The building incorporates a roof terrace on the 8th storey of the building fronting St Pancras Way and the east-west route, creating an intensive green roof and an area of brown roof on a café building. Taken together both types of green roof will provide a net gain in biodiversity to the site over its existing condition as will be discussed further below. Planting and the use of natural materials are also designed to enhance the well-being and reduce stress of staff and students working in the building.
- 14.20 Materials indicated for external and internal atrium surfaces: Norwegian shale, granite and permeable surfaces to facilitate sustainable urban drainage, have been selected for their material and natural qualities. Detailed design of their use, contribution to wayfinding and their association with other materials and design strategies to support partially sighted and users of the building with other disabilities has yet to be undertaken and will be the subject of a condition of any planning permission. The Landscape Report indicates that this detailed design will be subject to further consultation with relevant user groups and agencies. However, the suggest approach is supported and would include the use of robust, high quality natural materials.
- 14.21 In summary the design of the external space to the building, along with the atrium space and roof terrace contribute to the attractiveness of the routes through the site and will enhance the user's experience of the building. In addition new planting, particularly on the roof terrace will increase the site's biodiversity value.

Subject to securing details via condition and as part of the legal agreement, the scheme is considered to contribute high quality public realm.

14d) Trees

- 14.22 There are currently 11 trees plus 2 small groups of trees within the development site, as well as 5 small street trees within the adjacent footway to Granary street. One of these trees (a Robina) is the subject of a tree preservation order.
- 14.23 In order to consider the resulting impact upon and value of existing trees, an arboricultural report submitted with the application contains a tree survey in line with BS5837:2012. This has surveyed all trees within the development site as well as within the local vicinity and has also undertaken a valuation of the existing trees based upon the CAVAT system, which is recommended by the New London Plan.
- 14.24 The scheme would require the removal of all existing trees and shrubs from within the development site and along Granary Street, though none would be removed from the wider local area. The categorisation of the trees to be removed, in accordance with BS5837:2012 are set out in the table below. This would include a Robinia tree which is the subject to a tree preservation order (T14) which is category B.. There are also six young, small trees that are off-site on the highway on Granary Street which are also proposed for removal. As these saplings are too small to be counted as mature trees under the definitions of BS5837:2012

Tree grade	BS5837:2012 definition	No.
A	High quality, est. remaining life span of >40 yrs	0
B	Moderate quality, est. remaining life span of >20 yrs	3 individual trees
C + U	Low quality, est. remaining life span of >10 yrs or below 150mm in diameter	10 individual trees and 2 tree groups
	TOTAL	15

- 14.25 Due to their limited size the no.5 street trees to Granary Street are regarded as category C. These include four Lebanese Wild Apple and one Hornbeam. For clarity the total number of trees to be removed as part of the development is 15 including 3x Cat.B (one of which is the subject of a TPO), 10x Cat.C and 2x Cat.U.
- 14.26 Under the CAVAT system, the existing monetary value of these existing trees due for removal is estimated at approx.£160,000. The loss of any tree is regrettable and generally resisted under LP policy A3 where they contribute to amenity, social or ecological value. Notwithstanding it is noted that their location would mean that any attempts to comprehensively redevelopment the site (as per SALP policy

expectations) would be severely curtailed if they were to be retained and that none are considered high quality (category A). To insist of the retention of the trees on site would mean that this development would not be delivered. The Council's trees officers have reviewed the submitted assessment and do not disagree with its findings.

- 14.27 As part of the landscaping proposals for the site, tree replacements have been included within planters along the public walking route through the site as well as along the public footway of St Pancras Way. In total, 17 trees would be replaced, all to be specified as semi-mature. This would include a mixture of UK native species that have been selected for their local biodiversity value, their growth habit and appropriateness for their setting and conditions. Additional tree planting is also proposed to the roof garden, through this is not considered direct mitigation due to their siting and the private nature of the roof garden. Explorations of the potential for further planting along Granary Street have also been undertaken. However, the existence of a large amount of underground servicing would mean that any replacements would have to be very small (as per the existing trees). Given the scale of the proposed development it is accepted that trees of such minor stature would appear out of place and so this was ultimately accepted to not be appropriate.
- 14.28 The landscaping plan were then further adjusted following additional investigation of below ground services and visibility splays to junction with Granary St as well as discussions with trees officers. As a result, trees are no longer proposed to the NW corner of the site and are instead reposition along the main pedestrian route, maintaining the same number and specification of the 17 replacement trees
- 14.29 The proposed replacement planting is considered sufficient to mitigate the loss of canopy cover and amenity provide by the trees proposed for removal. The replacement trees will provide a greater degree of amenity to the public than those proposed for removal as most of the existing trees are internal to the site. The CAVAT value of the trees proposed for removal will be replaced by the replacement planting in 20-30 years and doubled after 40 years. In order to ensure that these replacement trees remain viable and sustainable, conditions will be applied for further submission of details of planter details, maintenance regimes and precise locations / species on an updated landscaping plan. This will also require the replacement of any trees or planting which dies within the first 5 years of the development. In addition, as some of the trees would be provided within the public footway, a capital contribution will be sought as part of the S106 to cover the cost of the installation and maintained of these trees,

Trees conclusion

- 14.30 It is accepted that a comprehensive redevelopment for the site will necessitate the removal of existing trees within the site. Generally, officers are satisfied with the approach taken in the assessment provided and welcome to use of CAVAT valuation, which is now best practice. To mitigate against the impact of the loss of existing trees, 16 replacement trees are proposed. These would also be specified as semi-mature to ensure immediate amenity value, whilst ensuring longer term viability. The replacement planting would, over time, be sufficient to mitigate the

loss of canopy cover and amenity provide by the trees proposed for removal and would be more visible. The range of species selected is also supported. Subject to the application of conditions, and a contribution to cover the cost of new street trees, the proposal would remain in accordance with the requirement of the local plan with regard to trees.

14e) Ecology and biodiversity net-gain

- 14.31 In order to consider and assess the value of the existing site for biodiversity and nature conservation as well as the potential impacts caused by the development, an ecological assessment has been submitted as part of the application, including a Phase 1 Habitat Survey. A separate bat survey has also tested for the likelihood of bat presence on the site. In addition, a separate biodiversity net gain assessment was provided. These documents have been reviewed by the Council's Nature Conservation officers.
- 14.32 These reports show that the existing site is of limited ecological value. The majority of the site is occupied by built form or hard standings (92% of area), with the remainder featuring amenity lawn areas and small areas of planting. The main existing value derives from the existing trees, as well as some shrubs and creepers that provide some existing habitat potential for nesting birds and some foraging potential for bats. In addition, the aged buildings on site were identified as having potential roost features for bats.
- 14.33 The ecological assessment concluded there to be negligible risk to protected species, including habitat potential, but did recommend further surveying for bats as well as various mitigation measures to enhance the value of the site for ecology. These would include planting, installation of brown/green roofs, installation of bird and bat boxes as well as provision for invertebrates. It also identified examples of invasive species which shall be professionally removed (Virginia creeper). Although the significance of both the St Pancras Gardens and the Regent's Canal is noted, the separation distance from the development site would mean that the development would not cause harm to the ecological value of these nearby designated nature conservation assets.
- 14.34 The bat survey has tested the potential for roosts within the site as well as monitored for evidence of bats emergence, foraging or commuting over the site via continuous surveying. Although a number of potential roost features were identified on the buildings, it found there to be no evidence of bat roosts within the development site. Bats were recorded travelling over the site on various occasions, most likely commuting between the canal and St Pancras Gardens, which is of high value. The demolition and new building is therefore not considered to pose any risk to the habitat, or foraging potential for bats in the local area, nor impact upon any roost. However, further mitigation in the form of bat boxes and controls for demolition are suggested to ensure that any remaining risk is alleviated. Although light spill from the development is not considered to pose a threat to adjacent habitat sites, it does have the potential to discourage bats to commute through the site. An external lighting strategy is therefore recommended to be secured by condition to ensure that the positions, specifications and lumen levels to exterior lighting remains appropriate for the setting.

- 14.35 In light of the findings of these two assessments, the biodiversity net-gain assessment has considered the value of the existing site against the value of the proposed development, setting out more detail on the ecological enhancements expected to be delivered. This assessment has utilised best practise approach for the calculation and assessment of biodiversity value. This finds that the existing site has a baseline 'value' of 0.47 units. Through the inclusion of ecological enhancements, primarily intensive green and brown roofs, diverse planting and trees, would generate a biodiversity value of 0.58 area-based units. This would amount to a 23% increase in the overall biodiversity value of the site, subject to the ecological enhancements being provided.
- 14.36 Despite the low baseline value of the existing site, the net gains in biodiversity would be welcomed and will be secured by means of condition. These will require the submission of full details of the ecology enhancements as part of an ecological management plan (e.g. bird and bat box specification and locations) and external lighting strategy. These, alongside the conditions for full and final landscaping details and maintenance strategy, will ensure that the development accords with the requirements of KLP policy A3 (Biodiversity) and para.170 of the NPPF.

14f) Overall conclusions on open space, landscaping, trees and nature conservation

- 14.37 The proposed development would not encroach upon, or erode any designated public open space. It is also not considered to detrimentally impact upon the setting or sense of openness to any designated open space.
- 14.38 The proposal would involve the creation of approximately 2000sqm of publicly accessible, high quality public realm and provide a new pedestrian route through the site. This contribution is welcomed and is in excess of the policy requirements, meaning that no further financial contribution for the provision of open space is required. The initial landscaping strategy is considered to be high quality and would offer a diverse range of planting in public areas. A roof garden would also be provided for staff and students. Final details of the landscaping and planting strategy will be secured by condition, allowing the applicants to undertake further engagement with patients and staff to inform the specifications.
- 14.39 The development would require the removal of all trees onsite (15) plus street trees to Granary Street but would propose 16 replacements of higher quality. The existing trees, with the exception of two Cat B trees, are generally poor quality (cat.C or below) and so their replacements with semi-mature trees in more prominent positions would represent an enhancement. Final details of these replacements will be secured by condition.
- 14.40 The existing site was found to be of minimum ecological value and not to have potential for the presence of protected species (including bats). Through the inclusion of biodiversity enhancements such as green/brown roofs, diverse planting and bird and bat boxes, the scheme would generate a biodiversity net gain for the site. In order to ensure this is achieved on site, further conditions will be applied for the submission of ecological enhancement strategy.

- 14.41 Subject to securing the mitigation outlined above, the development is therefore considered to comply with the requirements of LP policy A3 (Biodiversity).

[Link to assessment content table.](#)

15 Accessibility

- 15.1 Local plan policy C6 (Access for all) seeks to promote fair access and remove barriers that prevent everyone from accessing facilities and opportunities. This includes the expectation for all development to meet the highest standards of accessible and inclusive design, be focused in highly accessible locations, encouraging public transport use and providing adequate parking for disabled users.
- 15.2 The proposed development, given its specialist eyecare health care use, will mean that it will have a higher propensity for its users to be older or suffer from visual impairment or potentially other disabilities. Notwithstanding, the centre has been designed with users of all ages and levels of mobility in mind, taking an inclusive approach to its design. Specialist consultants (BuroHappold) have reviewed and informed the proposal throughout the design process with the specific task of considering ease of access for vulnerable users. UCL's Inclusion and Access manager has also fed into this design process including discussions relating to enhancements. In addition, the applicants themselves were well placed to feed to the design process through their detailed understanding of the lived experience of vulnerable users and have done so throughout.

Site location and access

- 15.3 As set out earlier in the report, the development site is highly accessible via public transport (PTAL 6b), being served by nearby bus routes and within walking distance of several major railway and underground stations. The site is therefore in an appropriate location for the intended use.
- 15.4 Whilst the walk to nearby rail stations is less than 1km (or half a mile), detailed analysis of the relative ease of accessibility along these routes has been undertaken in what is dubbed the last half mile report. This is particularly critical as ensuring that the walking route between nearby railway stations and the site is accessible and convenient will act to encourage active modes of transport for all users as well as mitigating against the risk of an influx of taxi journeys (this risk is discussed further in the transport section). After assessing all routes and considering the transport trip analysis, the report finds that Kings Cross and St Pancras stations will together act as the main rail termini for visitors to the development. It has therefore assess in detail the walking route from those termini to the site, and has suggested a range of enhancements that will aid in navigation, accessibility levels as well as pedestrian safety. These are suggested to address areas of potential conflict between different users and ensure the safety and comfort of all users.

15.5 In response, a package of measures dubbed the 'Green Line enhancements' have been proposed by the applicants. These proposals are based upon the tried and tested model that currently exists at the City Road site, where a green line painted to the public footway directs visitors from the closest station (in that case Old Street underground) through the concourse and directly to the front doors of MEH. In this instance, a similar approach is proposed, whereby a continuous ground treatment would lead visitors from these station exits directly to the main entrance of the development. The siting of this line has been carefully chosen to be that which is most convenient but also that features pavements of adequate width and avoids junctions / crossings that could pose a threat to those with visual impairment. Despite this, the optimal route selected was still found to have a number of shortcomings, notably:

- Limited opportunities to rest; and
- A junction without any form of crossing.

15.6 As a result, the applicants have agreed to make a capital contributions to deliver enhancements to ensure that this walking route is fully accessible, including the installation of two new zebra crossings as well as seating. This is in addition to a contribution to cover the initial cost of applying the green line to the public footway as well as a maintenance contribution. The new crossings locations relate to the Midland Road junction with Brill Place and the Pancras Road junction with Chenies Place. These are in addition to the raised table to be formed in front of the development on the junction of St Pancras Way and Granary Street (discussed further in the transport section).

15.7 In terms of the specification of the green line itself, the initial suggestion would include sections of the line being a simple textured painted line, with other sections such as through the station concourse being a non-slip floor sticker. The use of textured paving was also suggested in certain areas around the stations. These are accepted in principle, though it is noted that designs should be further refined with input from visually impaired user groups and the relevant landowners to determine the most successful approach. As such, a planning obligation is suggested that would cover the cost of the application of this green line to Camden's footways, junction upgrades and new seating (where they fall on public highways) as well as obliging the applicants to work further with other landowners to deliver subsequent sections.

15.8 In addition to the above, in order to aid in navigation a further contribution towards the cost of new Legible London signage is also required. This will include new signage at all of the local stations to direct visitors in the right directions. The applicants have already begun discussions with TfL on both of these proposals, with TfL remaining supportive of the approach. It was agreed that for the signage and green line measures within their demise (area around stations), bespoke options such as textured paving and apps that would pair with the signage totems should be tested with visually impaired user groups before determining the most successful option. This will be especially important around busy concourse exits that can be disorienting. The wording of the legal agreement will require these measures to be installed prior to the opening of the new facility, though there will

be flexibility to amend them as part of the review of the travel plan if more suitable options are found.

Building design and public realm

- 15.9 Given its intended use, the building itself has also been designed with the highest standards of accessibility and inclusivity in mind. The building has been designed to sensitively respond to the surrounding grade level (to ensure that retained heritage buildings are unaffected). Measures have been included to ensure that the building's internal levels its thresholds with the exterior would be level and that all ramps, entrances, doors and stairs would comply with the best practice requirements of the building regulations. Due to the significant change in levels across the site (3.8m), the lower ground and ground floor levels would feature a central stair. However, it was demonstrated at pre-app stage that it would not be possible to replace this with a DDA compliant ramp as there is simply not enough space within the footprint. Instead, a central shared lift core would act as the main means by which users would travel between floors. These have been designed to be used by all and would be the most convenient access route. All parts of the building, including the cycle store and roof garden, have been designed to feature step free access and doors would feature buttons for automatic openings.
- 15.10 Similarly to the above, the public realm and landscaping strategy has been designed with inclusivity and accessibility as its central tenet. Steps in all but a few areas have been designed out and replaced with ramped access. The approach to materials, lighting and floor treatment have been specifically selected with visually impaired users in mind. Raised planters with plenty of seating options to provide respite would be provided in various locations around the building. Whilst final details will be secured by condition, this is considered a highly refined response and the commitments made by the applicants for future user research to inform the final details is very much welcomed.
- 15.11 Overall it is considered that the development would represent an inclusive and highly accessible development. By securing mitigation via the legal agreement in the form of the 'green line enhancements' the development would also actively lower barriers that prevent all persons from accessing the facility in active and sustainable means.

[Link to assessment content table.](#)

16 Impact on amenity

- 16.1 The Development Plan requires decision makers to have due regard to protecting the quality of life of neighbours and occupiers, particularly residential, on matters including daylight and sunlight, outlook, overlooking, noise, construction impacts and disturbance. This chapter of the report will consider these issues in turn. Construction impacts are considered below and under the Transport and Highways of this Committee Report. The chapter is structured as follows:

a) Implications to light levels

- b) Outlook and overlooking
- c) Noise and disturbance
- d) Micro-climate
- e) Conclusion

Surrounding occupiers and neighbours

16.2 Buildings hosting a varied mixture of land uses surround the site. This includes residential accommodation, student flats, medical facilities, other employment uses as well as public open spaces. For clarity, the neighbouring properties that include some form of residential accommodation, and therefore have the greatest potential to be material impacted by the proposal are shown on the figure and are listed below.



Figure 18 - Site plan marked to indicate self-contained residential (green) or other sensitive uses (orange).

16.3 Self-contained residential properties (Use Class C3 - highlighted in green) are present within the vicinity of the site at:

- Goldington Court
- 1 St Pancras Way
- 3-5 St Pancras Way
- 7 / 7a St Pancras Way (upper floor, single unit (2-bed), rear building has also been converted into a dwelling)
- 101 Camley street (in final stages of construction)
- 102 Camley street (completed and occupied)
- Permanent moorings to the western bank of the Regent's Canal

- 16.4 Properties with non self-contained residential uses (highlighted in orange) are also present within the vicinity of the site at:
- South Wing, St Pancras hospital (Mental health inpatient ward C&I and Rehabilitation inpatient ward CNWL)
 - Residents block, St Pancras Hospital (In patient ward C&I)
 - 9 St Pancras Way (St Mungo's sheltered hostel, providing 21 single beds for homeless people for a maximum stay of 2 years)
 - 11-13 St Pancras Way (Unite student accommodation at upper floors, providing single bedroom accommodation for a maximum stay of 39 weeks)
- 16.5 In addition, a consented scheme at 2-4 St Pancras Way known as 'The Ugly Brown building', remains extant as works have commenced onsite. This permission granted permission for a mixed use scheme that included a block of housing located in the south eastern corner.

16a) Daylight, sunlight and overshadowing

Standards for assessment

- 16.6 A Daylight, Sunlight and Overshadowing Report has been submitted as part of this application which details any impact upon neighbouring residential properties and open spaces. This has been produced in accordance with the approach set out in the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight: A Good Practice Guide (2011)'. The report makes use of various standards in the assessment of implications for natural light:
- Vertical Sky Component (VSC) - A measure of the amount of sky visible at the centre of a window. The BRE considers that daylight may be adversely affected if, after development, the VSC is less than 27% and less than 0.8 times its former value (i.e. a reduction of more than 20%)
 - No Sky Line (NSL) - The area at desk level inside a room that will have a direct view of the sky. The NSL figure can be reduced by up to 20% before the daylight loss is noticeable (i.e. retain 0.8 times its existing value)
 - Annual Probable Sunlight Hour (APSH) - A measure of the amount of sunlight that windows within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period. The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months
 - Overshadowing - is assessed by considering any changes to surrounding outdoor amenity. BRE recommendation that 50% of outdoor amenity areas must receive two or more hours of direct sunlight. An area of amenity space or garden may be adversely affected if less than half (50%) of the area is prevented by buildings from receiving two hours of sunlight on the 21st March and the area which can receive some sun on the 21st March is less than 0.8 times its former value.

16.7 Officers note that it is industry practice to review changes in light by reference to the BRE methodology and criteria. It is an inevitable consequence of the built up urban environment that daylight and sunlight will be more limited in urban areas, such as surrounding the application site which is located within central London. Officers consider that in such situations there may be many factors to be considered in addition to daylight and sunlight contributing to overall amenity for occupiers of existing buildings. The BRE notes that while the Guidance offers numerical target values in assessing how much light from the sky is blocked by obstructing buildings, 'these values are purely advisory and different targets may be used based on the special requirements of the proposed development or its location'.

Daylight

16.8 The submitted report has assessed the potential change in daylight experienced at a total of 23 receptor sites within the immediate vicinity of the proposed development. Of these, five sites were initially discounted, as sufficient distance exists between facing windows and the proposed development to mean that daylight levels are unlikely to be affected. These include: Goldington Court, One St Pancras Way, 101 Camley Street, the South wing building and the Coroners Court. Across the remaining receptor sites, a total of over 1200 individual windows have been tested. In addition, daylight conditions of the approved housing block within the UBB site have also been tested based on approved plans. Where internal layout are unknown, windows are assumed to serve habitable rooms for the assessment.

Overview

16.9 In terms of daylight, the submitted assessment finds the development to have the greatest impact upon site immediately to the west along St Pancras Way or to the commercial uses to the north. The properties that experience greatest loss of daylight contain temporary, non-self-contained forms of housing such as the student housing block or a hostel. Noticeable loss of daylight were only recorded in five self-contained dwellings, with only one of these being considered to represent an adverse impact (7a St Pancras Way). This single dwelling occupiers two floors, with dual aspect meaning all windows to its top floor and rear still receive good levels of daylight.

Self-contained housing sites

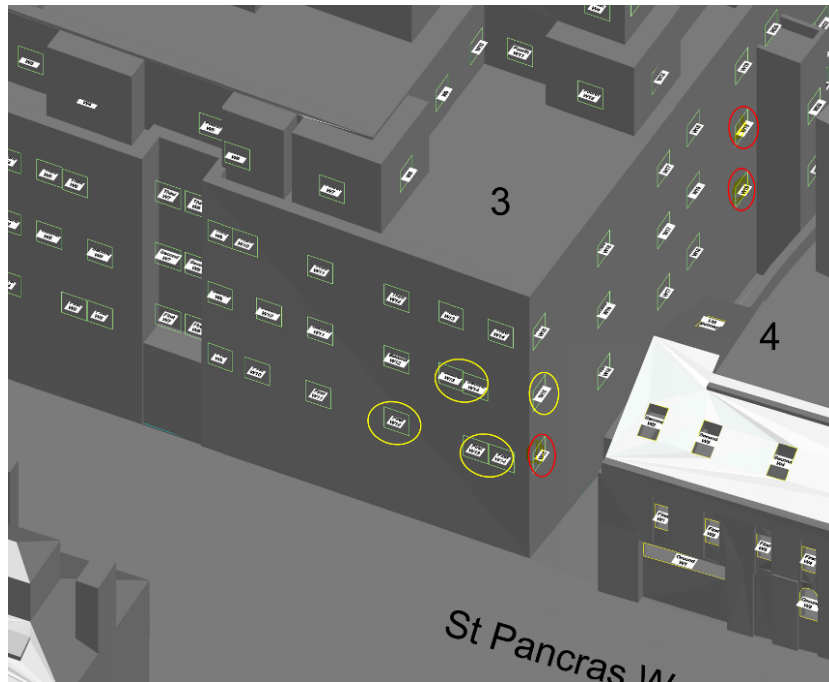
16.10 The assessment finds that with the development in place, existing daylight levels would be reduced to below the good practice benchmark (i.e. VSC of less than 27%) in certain instances at the following receptor sites containing self-contained housing:

- 3-5 St Pancras Way
- 7 / 7a St Pancras way

16.11 All other buildings in the vicinity that contain self-contained housing would be located far enough away from the development to not experience changes to existing levels.

16.12 3-5 St Pancras Way. A total of 105 windows have been tested between first and fifth floors. The assessments shows that the vast majority (92%) of the windows tested to this block would not experience a noticeable loss of daylight. A total of 9 individual windows would experience noticeable reductions; with VSC levels of less than 27% and experiencing less than 80% of former daylight levels meaning that they would fall short of the BRE guidelines.

16.13 From these 9 windows, 6 would retain VSC values in excess of 20% meaning that a decent amount of daylight would still be maintained, whilst 3 would be at or below 15% meaning they would experience a significant loss of daylight. These three windows are all located on the north facing elevation at either first or second floors. A further 22 windows would have VSC values of below 27%, but would still receive greater than 80% of their former value and so would not experience a harmful loss of daylight and would comply with the BRE guidelines.

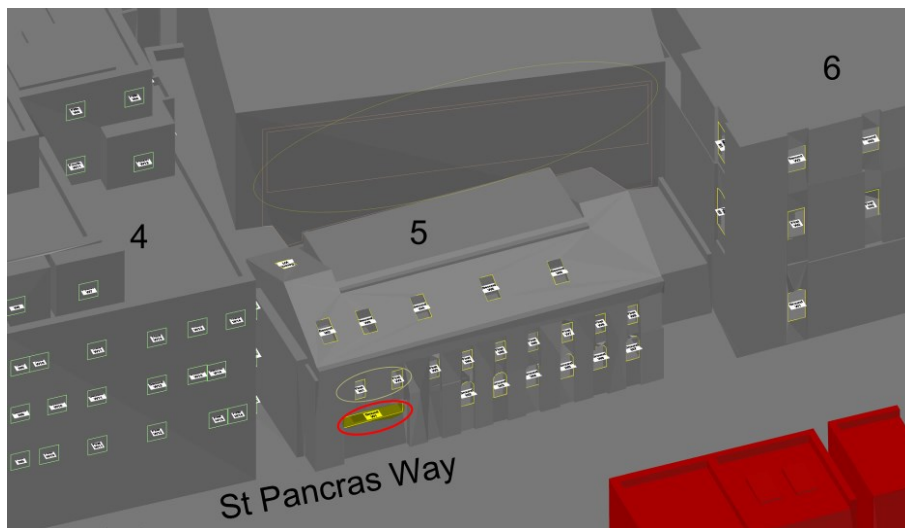


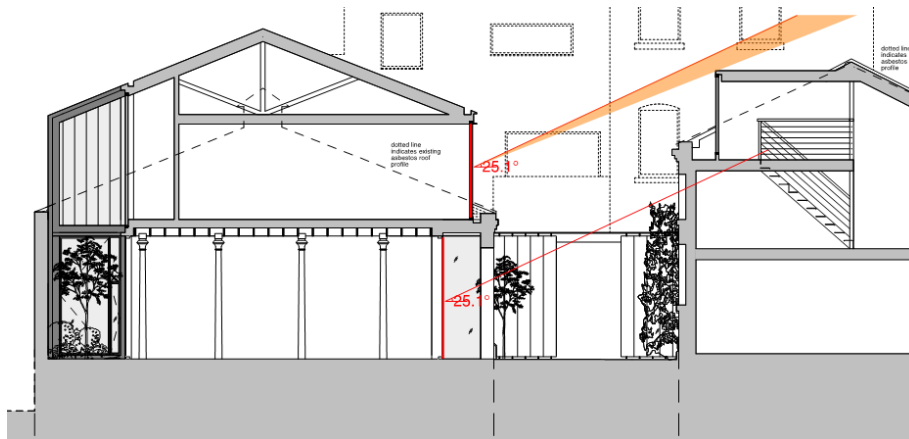
3D Model extract 1: windows effected to no.3-5 St Pancras Way that would fail against BRE guidance (red windows experiencing a significant loss)

16.14 The 9 windows which would suffer a noticeable loss are all at either first or second floor level serving four separate units at the north eastern corner or northern side of the block. The three windows that would suffer significant losses (with retained VSC levels of 8, 13 or 15%) all appear to be secondary, either serving rooms with additional private balconies/windows or providing dual aspect looking north. The two units at the north eastern corner also feature additional windows which face south that would not be affected. Given the number of windows to the same units not adversely affected and the availability of other windows and balcony spaces serving these units, this is not considered to result in

a harmful loss of amenity to the residents of these properties when considering their central London location. This is therefore not considered a significant impact.

16.15 7/7a St Pancras way, includes a former workhouse building of two storeys with roof extension that has been converted into an office and a single residential dwelling (2 bed) as well as a rear stables building which has also been converted into a 4bed dwelling. The dwelling in the rear block spans three floors and looks over a courtyard / towards the rear of the frontage block. Although most of the frontage block is in use as an office, approved plans show that the dwelling occupies a southern section, spanning three floors with an entrance and fanlight to St Pancras way. The residential unit within the front block features windows to its eastern and western elevations as well as rooflights to its top floor. Plans show the dwelling within the rear stables block to features habitable rooms at ground and first floor levels. At ground floor level, an open plan kitchen and living area has front facing glazing, but this is set behind a colonnade with brick arches that open up into the courtyard area which in turn is enclosed by the frontage block. At first floor level, curtail wall glazing (frosted) to the front elevation provides additional light to two bedrooms, a bathroom and an enclosed winter garden. A rear lightwell also provides natural light to both floors.





(Top) 3D Model extract 2: windows effected to no.77a St Pancras Way;
 (Middle) Sectional analysis (25 degree plane added to show amount of existing obstruction);
 and (Bottom) photo showing relationship between rear (left) and front (right) blocks

16.16 Of the five, front facing windows that serve the dwelling in the frontage block, three would experience a noticeable loss of daylight, with VSC of less than 27% and a less than 80% of their former value. These three windows are at ground or first floor levels and already have VSC levels of 30% or less. This would drop to 13% for the ground floor fan light or 18/17% to the two first floor front windows. Rear facing windows would not be affected. The three rooflights that provide light to the top floor would also not be effected, all receiving levels greater than 68% VSC. The ground floor fanlight (worst affected) provides light to an entrance hall and second bedroom, while the first floor windows provide light to an open plan living room/kitchen that features dual aspect. Whilst these windows would experience a noticeable change, they would still maintain adequate levels. The impact to the ground floor fan light would be greater, but it is noted that hall way spaces are less sensitive and so this impact would relate to the second bedroom at ground floor level only. It is also noted that rooflights and rear facing windows would not be affected and would still provide light to the main habitable rooms at first and second floor levels. The overall impacts to this dwelling are therefore not considered significant.

16.17 For the rear dwelling, it is noted that the relationship with the frontage block and recessed ground floor façade behind the brick arches and colonnade means

that daylight is already largely obstructed to the front (see section above). As a result, the proposed development would subtend into an angle of less than 25 degrees from the centre of the ground floor windows, meaning that the BRE guidelines would not expect further exploration as VSC levels will not be affected. The submitted daylight report also notes that facing windows would not be obscured by the proposed building when considering the 45-degree angular check set out in the BRE guidance. Nevertheless, further testing was still requested to consider the impacts to the first floor rooms. This found that VSC levels to the first floor curtain wall glazing are expected to be reduced to less than 0.8x their former value, with retained VSC values of between 20-21%. Although the first floor windows would therefore not meet BRE guidelines and would experience a noticeable reduction, it should be assessed against the existing conditions. In addition, levels of light from the rear lightwell would be unaffected. This would not be considered a significant impact to these occupiers.

Approved self-contained housing sites

16.18 The assessment has also considered the potential impacts to daylight levels to the consented block of housing within the UBB site to the north. Based upon the approved plans, the impacts upon a further 60 windows within this approved block were tested. This assessment shows that the proposed development would not result in any noticeable reductions to daylight received to the windows in this approved block, with 100% of the windows remaining in line with the BRE guidelines.

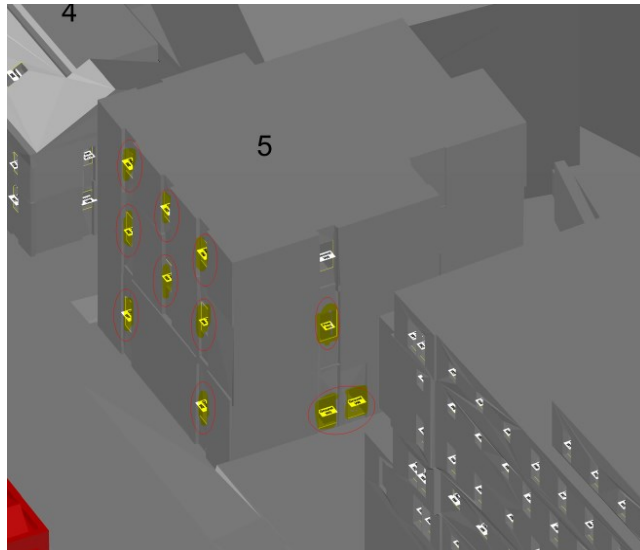
Non-self contained housing

16.19 The assessment finds that with the development in place, existing daylight levels would be reduced to below the good practice benchmark (i.e. VSC of less than 27%) in certain instances at the following receptor sites containing non self-contained housing:

- 9 St Pancras Way (St Mungo's sheltered hostel)
- 11 St Pancras Way (Unite student accommodation at upper floors)
- Residents block, St Pancras hospital (In patient ward C&I)

16.20 All other buildings in the vicinity that contain non self-contained housing would be located far enough away from the development to not experience changes to existing levels.

16.21 9 St Pancras Way is a three storey (plus basement) detached building that provides a homeless hostel operated by St Mungo's, offering single rooms with shared facilities and offices on the ground floor. Whilst these are not permanent residences, users of this service can stay for up to a maximum of two years. The buildings was extended to the rear and now offers 21 single rooms, with 9 in the rear extension and 6 at first and second floor levels in the main building.



3D Model extract 3: windows effected to no.9 St Pancras Way

16.22 A total of 17 windows were tested. Existing daylight levels were recorded as fairly low, with seven windows already being below the guidelines and none receiving more than 35% VSC at present. All of the windows to the rear elevation (serving 11 rooms at the back of the building) would be unaffected. The windows to the southern elevation (serving a further two rooms at first and second floor) would also remain in accordance with the BRE guidelines, with retained VSC values of 25 and 31%. The development would however result in a noticeable reductions in daylight to 11 windows, serving the remaining 8 remaining rooms as well as ground floor areas. These windows would fail against the BRE guidelines. The retained values would be less as you go down the building, with effected 3 windows at second floor retaining VSC values of 15/14%; dropping to 17-10% for the 4 at first floor and 12-09% for the 4 windows at ground floor level. Whilst it is noted that the ground windows an entrance lobby/office area (less sensitive), and that all of the share facilities within the basement would not be affected, these would still represent a significant effect on those 8 rooms. Whilst the accommodation within this building would therefore receive noticeably less daylight as a result of the development, it is noted that existing levels are low and that the building is sited immediately opposite a major development site. Although the building accommodates vulnerable users, it is still noted that type of accommodation is still more transient in nature than permanent residences meaning the affect to quality of life is less pronounced meaning this harm is given less weight.

16.23 11-13 St Pancras Way is a mixed use scheme featuring a double height builders merchant yard and commercial unit with student accommodation above. The student accommodation includes single rooms with shared facilities and is operated by Unite on behalf of UCL. The development includes three separate blocks that form a frontage to the western side of St Pancras way. Only the most southerly of these is effected, highlighted in yellow in the image below. From this block, a total of 107 windows are been assessed from the southern, eastern and northern elevations. No change would be experienced to the windows on the west facing (back) elevation). Existing daylight levels at this block were recorded as

fairly low, with 50 windows already being at or below the guideline and none receiving more than 35% VSC at present.



*Left: Whole of Travis Perkins block in red, effected block highlighted in yellow
Right: 3D Model extract 4: windows affected to no.11-13 St Pancras Way (yellow showing those with significant effects)*

16.24 The assessment shows that with the development in place, all but 11 windows would experience a noticeable loss of daylight and would fail to meet the BRE guidelines. The greatest losses were where the block immediately opposes the development site at first, second and third floors, where levels already fall below the guidelines and would be reduced further to between 19-5% VSC. At upper floors, reductions from the former values would be less, though the majority would still feature VSC values of less than 27%. Average retained VSC values for the windows across each floor within this block would be as follows: 1st floor 10%; 2nd floor 14%; 3rd floor 16%; 4th floor 16.5% and 5th floor 20%; and 6th floor 21.5%. The windows would therefore experience a noticeable reduction and would be below the BRE guidelines in all but 11 cases. In addition, 11 windows are expected to retain VSC values of less than 10%. These are mostly at first floor level.

16.25 This harm is noted and afforded weight in the overall assessment. However, given the temporary nature of the housing, its central location, proximity to world class amenities and existing low daylight levels recorded it is not considered that this loss of daylight would be detrimental to the points at which it would justify a reason for refusal. As the buildings provide student and visitor accommodation, any impact on their quality of living conditions are given less weight.

16.26 Residents block, St Pancras Hospital - this former workhouse building within the St Pancras was repurposed as a residential block offering sheltered accommodation. Across this block a total of 104 windows were tested, featuring various orientations. Of those tested, 90% would retain daylight levels in line with BRE guidelines. Only eight windows would experience a significant reduction. As set out earlier in the report, in order to ensure that the proposed development would not result in disproportionate impacts upon users of the existing hospital facilities, an obligation that all inpatient accommodation (including this block) is vacated and reprovided in advance of the construction of the building hereby proposed. It is therefore noted that the reduction in daylight levels to the eight windows would not result in any impact to living standards for occupiers of this block.

Sunlight

16.27 The levels of direct sunlight experienced in habitable rooms and amenity areas is directly influenced by their orientation, and the degree to which they are obstructed by built form or natural features. Existing windows that face within 90 degree of due north or at on receptor sites located to the south of the proposed development will generally not experience changes in levels of sunlight. Both annual and winter sunlight levels have been considered. The submitted assessment has tested for changes in sunlight levels at a total of 20 existing receptor sites as well as at the site of approved housing within the UBB site. Of these, all but six existing receptor would be located or orientated such that they would not experience any change in sunlight levels. The sites that contain sensitive receivers and required further testing are set out below:

- *7/7a St Pancras Way (self-contained residential)*
- *9 St Pancras Way (residential institution)*
- *11-13 St Pancras Way (student housing – non-self contained)*
- *Block C1 (approved housing at the UBB site)*

16.28 All of the other receptor sites tested would not experience detrimental reduction in sunlight levels owing to their orientation, siting and distance from the development site.

16.29 7/7a St Pancras Way Of the 27 windows test, all but one face within 90 of north meaning that they would not experience change in sunlight levels (annual or winter). The one window that does face within 90 degrees of south was shown to experience no change in levels of sunlight received. The development would therefore not result in any loss of sunlight levels to below BRE guidelines.

16.30 9 St Pancras Way: Of the 17 windows tested, all but 2 face within 90 degrees of north meaning they would not experience change in sunlight levels (annual or winter). The two windows that do face towards the south would experience a minor reduction in annual sunlight hours but would retain more than 80% of their former values. Neither would noticeable any change to the winter sunlight levels. The development would therefore not result in any loss of sunlight levels to below BRE guidelines.

16.31 11-13 St Pancras Way: Of the 107 windows tested, all but 5 face within 90 degrees of north meaning they would not experience change in sunlight levels (annual or winter). The five windows that do face towards the south would experience minor reductions in annual and winter sunlight hours but would all retain more than 80% of their former values and would all remain above BRE guidelines.

16.32 Block C1 (approved housing at UBB site): All of the 60 windows tested face towards south. All of these windows would experience a very minor reduction in annual sunlight, however, none would be reduced to less than 80% of their 'baseline' values and all would maintain APSH values of greater than 60%. These windows would experience a greater degree of loss of winter hours, with 30

windows between first and fifth floor levels reduced to less than 80% of their baseline winter sunlight levels. However, none would drop below the minimum of 5% set out in the BRE guidelines for winter sun and, as noted, note would experience a noticeable loss to overall annual sun light hours. It is therefore not considered that the development would result in any harmful loss of sunlight levels to surrounding residential blocks.

- 16.33 The assessment has also considered the impacts upon a number of blocks containing commercial or health care uses, including the North Wing, boiler and water tower buildings within the St Pancras Hospital site and the Ugly Brown site. Although less weight is afforded to reductions in natural light to commercial uses, it is noted that only the existing data centre within the UBB block would experience a significant loss of sunlight across its southern façade. This would also have similar implications for the commercial block approved in this zone (C1 and C2), however it is not considered that the resulting levels of natural light would affect the ability to host the commercial uses approved.

Overshadowing

- 16.34 Assessment has also been made to determine the degree to which the proposed building would cause overshadowing to gardens or amenity areas in the surrounding vicinity. Three sites have been tested, including St Pancras Gardens, as well as an amenity area and the permanent moorings adjacent to the Regents Canal. Analysis of the amount of light to the proposed roof terrace within the development itself is also provided. None of the areas tested would experience a noticeable degree of overshadowing from the proposed development. The two areas next to the canal would experience some very minor loss in sunlit areas (2% of area to experience shading) but this would not be noticeable or harmful. St Pancras Gardens, being to the south, would have no overshadowing. The proposed roof terrace would be completely unobstructed, receiving direct sunlight to 100% of its areas.

Light spill

- 16.35 As a result of the relative location and separation distance between the façade of the proposed building and the nearest opposing residential units and the specifications for internal lighting provided, it is not considered that light spill from the main façade would pose a threat to the living standards of neighbouring occupiers. However, it is noted that the scheme would include new exterior lighting to external areas to provide safety and ease movement. Both in order to ensure that this external lighting is specified to avoid direct light spill into adjacent residential units, as well as in an upwards direction for the purposes of nature conservation, a condition is recommended for full details to be provided.

Natural light conclusions

- 16.36 In terms of daylight, the vast majority of the windows tested would not experience significant or noticeable losses. This includes to the approved residential block within UBB site and other residential blocks such as 101 and 102 Camley Street. However, the proposed development would result in a noticeable losses of daylight

to the dwellings at 3-5 and 7/7a St Pancras Way, as well as significant losses at the Unite students housing block at no.11-13 and the hostel to no.9 St Pancras Way. The losses to the dwellings were not considered significant or to result in harmful loss of amenity.

- 16.37 The student housing and hostel blocks already experience relatively low levels of daylight and the development would exacerbate this further and result in them failing against the BRE guidelines in certain instances. It is also noted that these two buildings directly oppose the St Pancras Hospital site, which has been allocated for redevelopment since at least 2013. In addition, daylight levels would be noticeably reduced to a ground floor window to the dwelling house within no.7a St Pancras Way as well as to a number of individual windows at first and second floor levels at 3-5 St Pancras Way. As the affected units would feature additional windows that are not adversely affected the reductions experienced would not cause detriment to the quality of life for these occupiers when considering their location. This harm is acknowledged and forms part of the planning balance.
- 16.38 The development would not result in any harmful loss of sunlight levels (annual or winter) to any of the surrounding sites that contain residential uses. It would cause a loss of sunlight to the existing and approved commercial blocks within the UBB site to the north, however, as users of these blocks would not be permanent occupiers and the ability of the sites to host the commercial uses would be maintained. The development would not result in any harmful overshadowing to gardens or private amenity areas within the surrounding area.

16b) Outlook and overlooking

- 16.39 Visual privacy and outlook are important components of the residential amenity for occupiers and neighbours. To ensure privacy between facing windows of habitable rooms, the Council's adopted guidance recommends a separation distance of 18m as good practice. The proposal would involve a significant increase in height and massing on the site surrounded by varied forms of existing and consented uses. The relationship between the proposed massing and surrounding existing buildings is shown in the figure below. These will be considered in turn below.

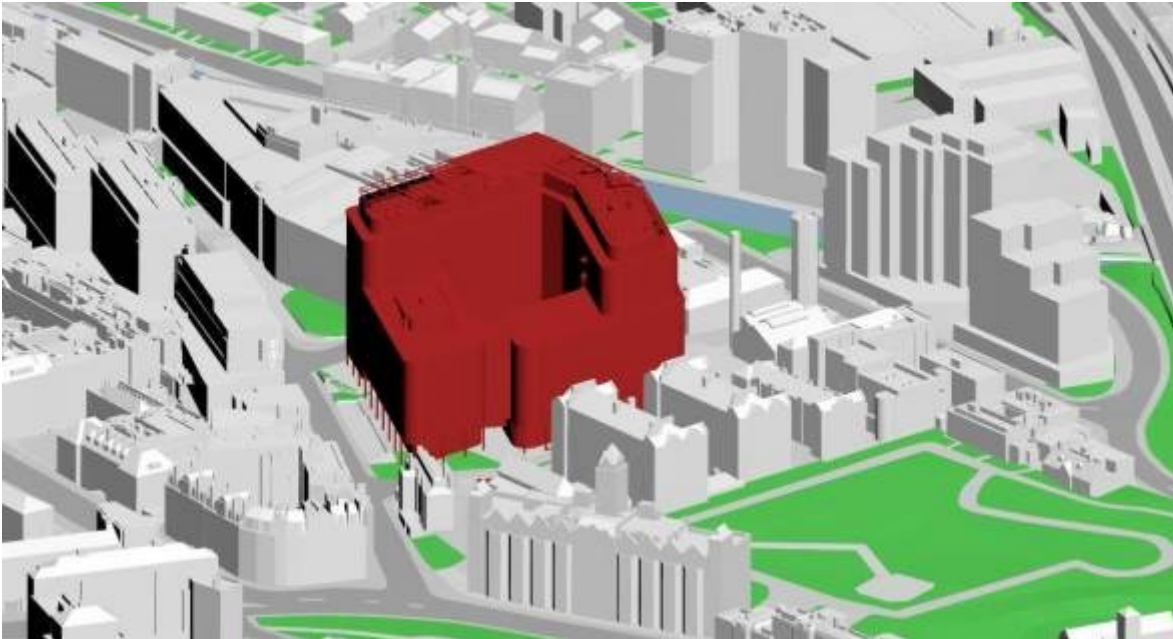


Figure 19 – 3D model of proposed massing showing relationship to surrounding buildings

Self-contained housing

- 16.40 Due to their location and aspect relative to the development site, the outlooks and levels of privacy to dwellings within Goldington Crescent, no.1 St Pancras Way, 102 Camley Street as well as the rear block to 7/7a St Pancras Way would not be adversely affected. Whilst units with western aspect in 101 Camley Street would experience a major change in outlook (with views towards the Oriel rather than the sky), a minimum separation distance of 59m would mean that this would not appear overly dominant / overbearing and would not affect privacy. Similarly, with a separation distance of greater than 18m and an indirect aspect towards the development site, the consented block of residential accommodation within the UBB site would not be adversely overlooked and the development would not appear overbearing in the outlooks from the units. Notwithstanding the above, as a result of their aspect and proximity the development would affect dwellings on the Western side of St Pancras Way, as detailed below.
- 16.41 7/7a St Pancras Way – the residential dwelling at first and second floor level within the frontage block would experience a loss of outlook from the proposed development and would experience some sense of overlooking to first floor windows that face towards the application site. The main aspect from this unit faces across the development site in a south easterly direction and a separation distance of only 14m would exist between this building and the closest point of the proposed building. Whilst this harm is noted, it is also acknowledged that the unit directly opposes a site that has been allocated for major redevelopment since at least 2013 and that any development of greater than 2 storeys would cause this affect. Given the intended use of the site, the impacts to privacy would be less pronounced as activities would not be occurring outside of working hours in the outpatient clinical treatment rooms that would oppose the unit. It is noted that the outlook from the rear block is currently towards the rear of the frontage block only.

Whilst the building would be visible above this in views from the property, this would not be overbearing given the existing relationship and separation distance.

- 16.42 3-5 St Pancras Way – Dwellings in this block feature either a north-eastern, or south-eastern aspect. As a result of its positioning and orientation relative to the development site, the proposed development would not encroach into the direct aspects from any units, but would be very prominent in angled views. This encroachment into peripheral views is not considered harmful as it would not appear overbearing. At the closest point, a separation distance of only 16m would exist. This may therefore mean that front balconies to the units in the north eastern corner of the block feel a sense of overlooking. However, as these balconies are inset and do not face directly towards the development this would be less severe. It is noted that this separation distance is only slightly less than the 18m best practice value and, as discussed above, the proposed uses would mean that the areas within the development oppose this block would not operate outside of normal hours, lessening this impact further.

Non self-contained housing

- 16.43 9 St Pancras Way – This block faces directly towards the development site, with a separation distance between facing elevations of 20m at ground and first floor levels but 16m at third floor level. At present, the main (south-easterly) aspect from front windows is unobstructed and this would dramatically change as a result of the proposal. The aspect and sense of privacy to windows on the rear and side elevations would, however, be unaffected. The separation distance of 16m would reduce this impact so that, whilst dominating the outlook, it would avoid a harmful sense of overlooking. The use and timing of the outpatient treatment rooms that would oppose the block would also reduce sense of overlooking during sensitive hours. Whilst the change in outlook from this block would therefore be considerable, it is not considered to undermine the ability for existing use to continue unimpaired and users of the hostel would avail from the improvements to public realm and street scape that will be delivered as part of the scheme,
- 16.44 11-13 St Pancras Way – The student housing on the front half of this block at upper floors also faces south-east. Due to its relative position and orientation, the proposal would directly encroach into the outlooks from front facing windows for a width of 23m, out of the total width of the building (c.130m). As the affected section would directly oppose the development site, windows would also experience a significant change in outlook from currently unobstructed views across the site to a view to the Oriel only. However, it is noted that a separation distance of between 15-17m would be maintained across this section. Similarly, whilst slightly below the best practice separation distance, given the timings of activities occurring and minimum distances maintained this would not be considered to represent a harmful sense of overlooking to these units. It is also noted that this block does not contain external balconies that might be overlooked.
- 16.45 For clarity, the resulting relationship between the blocks discussed above and the proposal is shown below, with areas where a significant change in outlook would be experienced highlighted in yellow.

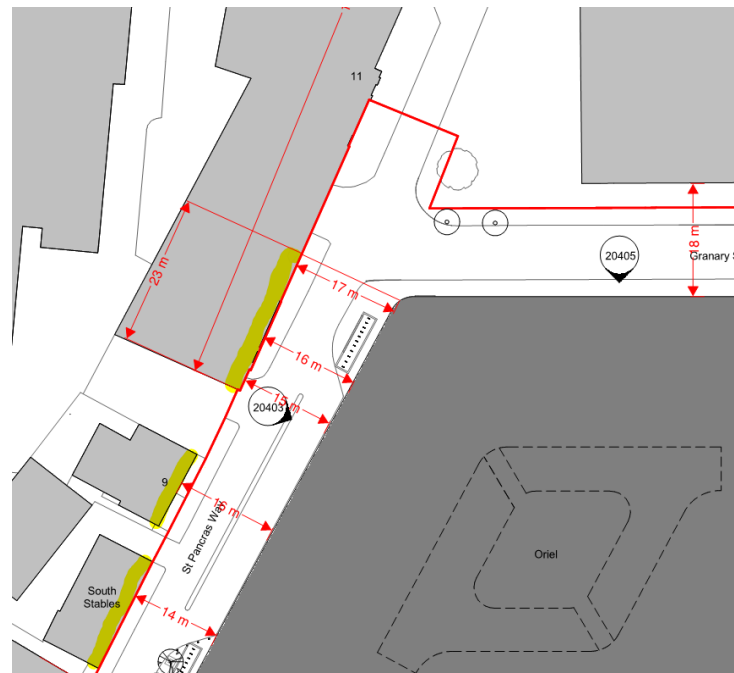


Figure 20 – site plan showing separation distance between proposal and blocks to the West of St Pancras Way (areas of significant change in outlook shown in yellow)

- 16.46 Residential blocks, St Pancras – As previously discussed, the obligations set out within the S106 agreement would mean that all inpatient accommodation would be transferred off the hospital site in advance of the start of construction. Notwithstanding, it is also noted that due to the E/W aspect of the residential block and the position and orientation of the South Wing, neither would experience a harm loss of outlook or privacy.

Outlook and overlooking conclusion

- 16.47 The proposed development would avoid detrimental loss of outlook or cause a sense of overlooking to all blocks featuring residential land uses situated to the south, east or north of the development site. However, it would affect properties to the west along St Pancras Way. This is considered to include a harmful loss of outlook to first floor windows on the front elevation at 7/7a. Outlooks would also be impacted upon from front facing windows to the hostel at no.9 as well as a 23m section of the student housing in no.11-13 St Pancras Way. Separation distances between these affected blocks and the development would vary from 17 to 14m, meaning that some sense of overlooking might be experienced. This sense would be less severe as a result of the relative timings of the uses, with the clinical outpatient rooms that face these blocks not being in use during sensitive hours. Overall it is considered that the development would cause a harmful impact to the occupiers of the dwelling at no.7/7a, but that the temporary occupiers of no.9 and 11-13 would not experience a determinant impact to quality of life.

16c) Noise and disturbance

- 16.48 Noise and disturbances can also affect quality of life for neighbours and occupiers and accordingly, LP policy A1 expects an assessment of the impacts of noise and vibration through acoustic reports. The degree of impact varies dependent on the

different noise sources, receptors and times of operation. As such, the NPPF and Appendix 3 of the Local Plan set out the specific levels that would cause a significant adverse effect (red); to be observable but less disruptive due to context (amber); or to be of an acceptable level (green). Impacts from flues are discussed in the air quality section of the report.

- 16.49 Given the specialist clinical care and research use of the building and inclusion of low carbon heating technologies that rely on fans, the proposal will include a vast amount of plant and specialist equipment, all of which have the potential to emit noise and vibrations when in operation. These will be positioned across the building including at interstitial plant floors, basement and roof levels. In addition, the use is one which will result in a large degree of comings and goings of delivery and servicing vehicles and the construction process is also likely to involve noisy works. Although there would be a café provided onsite, this would not include a full kitchen or require the use of extract ducts.
- 16.50 A noise and vibration assessment was submitted in support of the application. This has been prepared by suitably qualified professionals in line with the Council's standards and guidance. Officers from the Council's Environmental Health departments have reviewed this assessment. The report has appropriately identified the nearest existing noise sensitive receptors, as well as future receptors from the block of consented housing within the UBB site. Monitoring at four locations around the perimeter of the site was undertaken to establish a baseline condition for background noise levels. As this monitoring was undertaken during the past year, the findings have been cross-checked against historical noise data collected as part of acoustic studies for planning applications at 101 Camley Street and the UBB site to ensure that they are truly representative of the existing conditions.
- 16.51 The assessment demonstrates that the total operational emissions would comply with the aforementioned requirements of the Local Plan, NPPF as well as BS 4142:2014. Building services and plant will be designed to achieve suitable operational noise levels at nearby sensitive receptors and this has been shown to be feasible. The building services plant will be required to achieve noise levels set to 10 dB below the measured LA90,T background noise level representative of the receptor location. For hospital buildings, a limit of 10dB below the LAeq,T ambient noise level has been set. The noise level produced by the plant has been shown to remain within the acceptable limits, though in order to ensure compliance with the recommended noise level at the residential properties, it is recommended that acoustic screening be part of the noise mitigation strategy. This can be incorporated into louvre systems where necessary without affecting external appearance. Conditions are therefore recommended that require the submission of final details to demonstrate compliance prior to first operation.
- 16.52 Noise and vibration generated by construction activities associated with the proposed development are likely to exceed 'amber' levels at nearby sensitive receptors throughout the construction programme. Noise emissions during demolition and substructure works may result in exceedances of the 'red levels' at existing receptors that are part of the wider St Pancras Hospital site. In light of these predicted exceedances, further mitigation will be required as part of a

Construction Management Plan to alleviate any temporary disruption to occupiers of surrounding properties. This will be discussed further in the transport section.

- 16.53 Subject to the application of conditions for final noise reporting to demonstrate compliance and outline the necessary acoustic mitigation and vibration measures the assessment is not considered to result in detrimental impacts to adjoining occupiers and neighbours and to remain in accordance with policy A1.

16d) Micro-climate

- 16.54 The microclimatic impact of a tall building on its local environment at ground level as a result of overshadowing and increased wind speeds is an important area of assessment of the acceptability of the proposed height. A wind micro-climate assessment has been provided in support of the application. This considers the potential wind effects with respect to pedestrian comfort and safety during demolition and construction of the development and after its completion. Over 200 locations were assessed, including at ground level within the site, at terrace level and around surrounding buildings and open spaces. This has tested the impacts caused by both the proposed development as well as the cumulative effects of other approved schemes. This assessment has been based upon the Lawson Criteria which is regarded as standard for such assessments. This has included testing on the basis of both general pedestrian activity as well as for more vulnerable users and for both summer and winter conditions. The overshadowing impact is assessed in the Impact on Public Open Space section above.
- 16.55 The modelling within the wind microclimate assessment did not identify any significant effects upon completion of the development (examples of 'distress conditions'). For the vast majority of locations tested, the resulting conditions will remain suitable for any pedestrian activity, including sitting or strolling, throughout the year. This remains the case when taking into account the cumulative effects of approved developments. When considering the cumulative effects during winter, there were a select few examples where conditions would be suitable for pedestrian strolling, rather than seating/'any activity'. However, even in these cases no levels of distress would be caused. At ground level all the locations would be away from the entrances and areas of public realm designed for dwelling. This is not considered to represent an adverse impact and so no wind mitigation measures are proposed or considered necessary by officers.

16e) Neighbouring amenity conclusion

- 16.56 Overall the assessment finds that the development would lead to a determinant impact to only one dwelling (7/7a St Pancras Way), which would suffer from a loss of outlook and natural light to its front facing first floor windows. Levels of natural light would however be maintained to the roof lights that provide light to the top floor of this dwelling. No other self-contained dwelling would suffer from a detrimental loss of amenity. Nevertheless, this is afforded significant weight in the assessment. Adverse impacts in the form of loss of natural light would also be experienced to the non-self-contained housing units at no.9 and no.11-13 St Pancras Way. These blocks contain student housing and a hostel, with communal facilities. These impacts are still afforded weight in the assessment, though a

reduced amount given the temporary nature of the housing. Subject to securing various mitigation via conditions and the legal agreement on matters such as confirmation of compliance to noise standards, the development would not result in a detrimental impact to the amenities of any other surrounding occupiers. This includes the new development at 101 Camley Street, the residential moorings to the canal and the consented housing block in the UBB site.

[Link to assessment content table.](#)

17 Transport and highways

17.1 This chapter of the report will consider the transport impacts associated with the development. The chapter is structured as follows:

- a) Trip generation
- b) Travel planning
- c) Cycle parking
- d) Car parking
- e) Deliveries, servicing and drop off / pick up
- f) Public highway changes and works directly adjacent to the Site
- g) Pedestrian, Cycling and Environmental Improvements in the local area
- h) Construction management
- i) Excavation in close proximity to the public highway
- j) Transport Conclusion

17a) Trip generation

17.2 The submitted Transport Assessment (TA) and associated technical notes includes details of trip generation analysis from the use of TRICS trip generation software, and surveys carried out from the existing site at City Road, and surveys of existing users of the current eye hospital.

Existing Trips

17.3 The TRICS analysis estimates that the buildings proposed to be demolished at the existing St Pancras Hospital site generate 108 two-way trips in the AM peak hour and 134 two-way trips in the PM peak by all modes, with 33 two way vehicle trips in the AM peak and 23 two-way vehicle trips in the PM peak.

Proposed trips

17.4 Detailed analysis was carried out on the estimated trips generated by the development by 2026 (the earliest that the hospital could be open), using surveys carried out at the existing site, information on staff and patient numbers supplied by Moorfields at City Road and UCL.

17.5 The estimated person trip numbers for the proposed development are 1712 two-way trips in the AM peak (1574 in and 138 out) and 1652 two-way trips in the PM peak (230 in and 1423 out). These are the total amount predicted for all users of the site, including staff, students, visitors, patients and their companions. This analysis shows that there will be a significant increase in the number of trips generated by the development to the site and surrounding area. Mode share information for staff/students and patients is taken from the census journey to work data, and was adjusted to represent the car free nature of the development. The following table represents the mode share for staff/students and the corresponding number of trips in the peak hours by mode.

	Modes	%	Peak hour two way trips	
			AM	PM
Highway	Car driver	0%	0	0
	Car passenger	1%	12	13
	Taxi	0%	11	15
	Motorcycle	2%	28	27
Public Transport	Rail	32%	577	566
	Underground	38%	667	655
	Bus	14%	246	241
Active Travel	Walk	8%	103	84
	Cycle	5%	64	48
Other	Other	2%	2	1
Total		100%	1712	1652

17.6 Further surveying of staff and patients were undertaken to understand users preferences for future trips to the new site, these findings support the modelled mode split set out above. A monitoring survey carried out at the City Road site found that between 07:00 and 19:00, 127 drop-off/pick-ups were carried out by taxis/private hire vehicles, 44 were made by private ambulances, and 99 by private vehicle. These vehicle trips can be attributed to patients visiting and leaving the site, with the maximum number of vehicles observed in any one hour being 45.

17.7 Further trip analysis was carried out to determine how the drop off/pick-up would be affected if those people predicted to arrive to the area by underground or rail (likely to be St Pancras and Kings Cross Station), were then to travel from the station to the site by taxi. It was estimated that if the majority of the patients that arrived by rail/underground travelled the final leg of the journey by taxi, the drop-off/pick-up facility would be operating at capacity, and at times may not have the

space to accommodate all vehicles in the AM and PM peak hours. 'Last half mile' measures are discussed in the sections below to help mitigate these effects.

17b) Travel planning

17.8 As detailed in the previous section, there is a significant amount of staff, patient and student trips associated with the development. A draft travel plan has been submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. A strategic workplace travel plan and associated monitoring and measures contribution of £9,762 will be secured as a section 106 planning obligation if planning permission is granted. The Travel Plan would be targeted towards encouraging staff, patients and students of all of the different uses of the site to make walking, cycling and travel by public transport the natural choice for day-to-day trips.

17c) Cycle parking

17.9 The proposed healthcare centre will accommodate up to a maximum of 1490 staff at any one time. In accordance with the London Plan, the proposal is required to provide the following cycle parking spaces in accordance with the London Plan:

Land Use	Long-Stay Requirement	Short-Stay Requirement
Hospitals	1 space per 5 FTE staff	1 space per 30 FTE staff
B1 Research & Development	1 space per 250sqm GEA	1 space per 1,000sqm GEA
Education (D1 Other)	1 space per 8 FTE staff	1 space per 100sqm GEA
A3-A5 café / restaurant / takeaway	From a threshold of 100sqm, 1 space per 175sqm GEA	From a threshold of 100sqm, 1 spaces per 20sqm

17.10 The council's CPG Transport encourages developers to provide an additional 20% over and above the above standards set in the London Plan. The development is therefore expected to provide 337 long and 92 short stay cycle spaces. In attempting to meet this provision, the applicant is proposing a total of 407 long stay cycle parking spaces and 112 short stay spaces

17.11 The long stay spaces are proposed in a dedicated cycle store, which is accessed via a step free route from the ground floor to the south east corner of the building. The proposed cycle parking provision is made up of 374 2-tier stands, 24 folding cycle lockers, 4 Sheffield stand spaces and 5 non-standard cycle spaces. The provision is deemed acceptable and is above the minimum requirements of the London Plan. There is also capacity to alter the final layout and number of the different cycle parking types should this be desirable. Lockers, showers and

changing facilities are also provided on the ground floor adjacent to the cycle store. There are 112 short stay cycle parking spaces proposed in the public realm. 34 of these spaces will be provided on public highway near the entrance to the building on St Pancras Way, with the remaining provided around the building within the site. The cost of short stay cycle parking on the public highway will be secured via the legal agreement.

- 17.12 The provision of long stay and short stay spaces, as well as the associated facilities are acceptable. Conditions are recommended for full details of parking and facilities specifications and for these to be installed prior to first opening / retained as such.

17d) Car parking

- 17.13 The development will be secured as car free, restricting occupiers from obtaining business parking permits. Disabled Bays will be provided within the site, accessed via an internal road that runs through the site. The entrance to this road will be from St Pancras Way, in the same location as the existing entrance to the site. Any further disabled parking can take place near the site on Granary Street if the need arises. This is acceptable from a general parking point of view, as the parking bays within the building will not be used for private parking and only used for operational purposes, in accordance with Policy T2. A car-free planning obligation would be secured by legal agreement in accordance with Policy T2 if planning permission were granted. A Car Parking and Patient Drop off Management Plan will also be secured as a S106 planning obligation, to demonstrate how parking will be managed, monitored and enforced.

17e) Deliveries, servicing and drop off / pick up

Deliveries and Servicing

- 17.14 The site will be serviced from an internal servicing area within the building, accessed from Granary Street. The layout of the servicing area enables vehicles to enter and leave the site in forward gear while still allowing adequate space for loading / unloading.
- 17.15 A draft delivery and servicing plan has been submitted in support of the planning application, which estimates the completed development would generate an average of 61 deliveries per day, including waste collection. The remaining vehicle trips to the site are associated with patient drop off/pick up, which will take place from the dedicated pick up/drop off facility provided on St Pancras Way. All delivery/servicing vehicles, refuse and recycling collections associated with the hospital site will be accommodated within the servicing area. The only delivery expected to take place from the carriageway is for a 6 monthly oil delivery. Due to the design of the building and requirements of the oil storage, the delivery will take place from the entrance of the loading area on the carriageway, and is therefore proposed to take place outside of normal working hours. A commitment to ensuring that this occurs outside of regular hours to minimise disruption will form a part of the servicing management plan.

- 17.16 The servicing related trips should have a minimal impact on the surrounding highway network as long as they are managed effectively. To ensure that deliveries, refuse and recycling collections and other servicing vehicles do not have an impact on the footway and the cycle lane, a Delivery and Servicing Management Plan will be secured as a section 106 planning obligation if planning permission were granted.
- 17.17 As described above, the existing site currently benefits from a vehicle entrance and exit to the highway on St Pancras Way. As part of the development, this vehicle entrance will be rationalised, providing vehicles with an entrance only from St Pancras Way. The internal road will be controlled, designed as a pedestrian and cycle route through the site and will not be available as a through route for general vehicles.

Patient pick up and drop off

- 17.18 The proposed development will provide a facility for vehicles to drop-off and pick up patients, located off the public highway accessed from St Pancras Way. The design of the facility will separate the facility from the carriageway, with one entry point and one exit point onto St Pancras Way. Stopping up of the footway and a small section of carriageway adjacent to the site is also required in order to implement the facility. A Stage 1 Road Safety Audit was carried out for the site which included the proposed drop-off/pick-up facility, and no major road safety concerns have been identified.
- 17.19 The facility will be able to accommodate 7 vehicles (3-4 private ambulance and 3-4 taxi/private vehicles) at one time, while also allowing vehicles to move in and out of the facility unimpeded by stationary vehicles. With an estimated and managed dwell time of 3-5 minutes, the facility will be able to accommodate 84-140 vehicles per hour if required. This facility is not for vehicles to park, and will be managed to ensure vehicles do not occupy spaces for longer than is required. Assuming that the numbers of visitors arriving by vehicle remains in line with the mode split analysis and user preference survey, the drop off bay will remain sufficient to accommodate the drop off needs of the development. Officers do note however that if a significant number of visitors to travel by rail opt to take a taxi for the final leg (last half mile), this could result in the drop off area being overwhelmed. As a result, various mitigation would be secured to alleviate this risk and discourage unsustainable modes. This will include the travel plan and drop off management plan, but also a range of enhancements as will be discussed in the 'last half mile' section below.

17f) Public highway changes and works directly adjacent to the Site

- 17.20 The proposed development will necessitate a number of changes to the surrounding public footway and highway. In addition, the Council also needs to be sure that any damage caused during the course of construction will be adequately covered by the applicants. These proposals were the subject of detailed review and feasibility assessments during the pre-application process.

- 17.21 As discussed above, the proposed patient drop-off/pick-up will require the stopping up of a small section of carriageway and the footway along the western side of the proposed building. Pedestrians will still be able to move past the site along the footway adjacent to the building along St Pancras Way. The resulting footway width along this section will be wider than the existing footway, and access for pedestrians along this section will be secured by legal agreement and maintained in perpetuity. The design will also mean that pedestrians will not have to cross the drop-off/pick-up facility when walking along St Pancras Way.
- 17.22 Due to the proposed design of the building, there will be footway space gained along Granary Street, at the Granary Street - St Pancras Way junction near the north west corner of the site, and on St Pancras Way near the south west corner of the building. These changes represent improvements to the public highway by providing more footway space, while also allowing for the inclusion of cycle parking and greening to the area. A raised table is also proposed on St Pancras Way, at the St Pancras Way – Granary Street junction. This will provide a level crossing across both Granary Street and St Pancras Way, as well as a traffic calming measure for vehicles travelling along both streets.
- 17.23 The development will result in a redesigned vehicle entrance on St Pancras Way. Part of this entranceway will be public highway, and therefore any bollards or measures restricting vehicles from entering the site must be adequately set back from the public highway, with enough space available that a waiting vehicle will be able to wait off the carriageway and will also not be blocking the pedestrian desire line along the public footway and within the site.
- 17.24 The capital costs of implementing the measures discussed above will be secured within the S106 legal agreement. It should be noted that any measures are dependent on further detailed design and consultation

Last half mile

- 17.25 As discussed above and in the accessibility section for the report, further measures are required to provide safe and efficient routes between St Pancras International/Kings Cross Station and the site, ensuring the pick-up/drop-off facility operates as designed and to ensure there are no negative effects on the public highway.
- 17.26 One of the proposals (green line) is to encourage visitors to walk to/from the site, by introducing a green line on the footway. This line will lead directly from Kings Cross station, via St Pancras International Station, to the site. This measure currently exists between the City Road site and Old Street Station, and a similar design is proposed for this location. Along the green line route, there are also proposed changes to the Chenies Place – Pancras Road junction, which include the introduction of a zebra crossing.
- 17.27 The applicant has also committed to exploring the possibility of introducing two new bus stops and a zebra crossings crossing on Pancras Road, near the site. The applicant will also contribute the financial costs of implementing the measures, and these measures will be implemented if they are deemed feasible by Transport

for London (TfL) and the council. If the proposed new bus stops are not able to be implemented, and there is an issue with the capacity of the pick-up/drop-off facility resulting in negative impacts to the public highway, the applicant has agreed to provide an alternative transport solution in the form of a shuttle bus that will run between the train stations and the proposed site.

17.28 Discussions with TfL have already begun, though more feasibility testing and analysis will still be required to determine the most appropriate option. An approach that includes new bus stops close to the site would mean that patients (many of whom travel for free on TfL services) could easily travel between the station and the site, minimising the risk of the use of private taxis to cover the last half mile. Additional / replacement stops closer to the station exists are also to be reviewed and considered. These provisions would be considered to ensure the safe operation of the highway to prioritise sustainable modes of travel regardless of visitors' level of mobility. The capital costs of implementation of these measures (and the maintenance of the green line) will be secured within the S106 agreement.

Highways contribution

17.29 The carriageway and footway directly adjacent to the site on St Pancras Way and Granary Street is likely to sustain significant damage as a result of the proposed demolition, excavation and construction works. The Council would need to undertake remedial works to repair any such damage following completion of the proposed development. These works will also include the provision of and works to incorporate new footways and highway layout within the public highway.

17.30 A highways contribution would need to be secured as a section 106 planning obligation if planning permission is granted. This would allow the Council to repave the carriageway and footway directly adjacent to the site and repair any other damage to the public highway in the general vicinity of the site. The contribution will also allow for the two existing crossovers to be removed, and the proposed crossover to be implemented. The highway works would be implemented by the Council's highways contractor on completion of the development. A cost estimate for the highway works has been estimated by the Council's Transport Design Engineering Team to be £157,462.75

17g) Pedestrian, Cycling and Environmental Improvements in the local area

17.31 The development would introduce a significant increase in person trips (staff, patients, students and visitors) to the area. The Council, through its policies and strategies aims to encourage sustainable and active travel such as the use of public transport, walking and cycling as the primary mode of transport for journeys within the borough, and is committed to improving cycling and pedestrian routes in the area. As discussed above, the cost of implementing measures such as the Green Line wayfinding proposal and the associated junction improvements, traffic calming, footway improvements, street greening and short stay cycle parking will all be secured via the S106 legal agreement. A contribution towards the cost of segregated cycling facilities on St Pancras Way will also be secured.

17.32 The Council will seek to secure a Pedestrian, Cycling and Environmental (PCE) improvements contribution of £206,000 as a section 106 planning obligation if planning permission is granted. This would be used by the Council to implement the measures discussed above to transform the public realm in the general vicinity of the site for the benefit of cyclists and pedestrians. The contribution would be focussed towards improving cycling and pedestrian routes and environments, thereby helping to encourage staff, patients and visitors to walk, cycle and use public transport

17h)Managing and mitigating the impacts of construction

17.33 Disturbance from development can occur during the construction phase. Policy A1 sets out that measures will be required to reduce the impact of demolition, excavation and construction works must be outlined in a Construction Management Plan.

Construction management plan

17.34 A draft Construction Management Plan (draft CMP) has been submitted in support of the planning application. While the information provided in the draft is useful, a more detailed CMP would be required and secured via a Section 106, which will include information on vehicle routes, site set-up and how the safety of pedestrians and cyclists around the site is prioritised. The final CMP will also be informed consultation with surrounding land-owners (and wider community) on construction matters with as part of a Construction Working Groups and St Pancras safety group, which will be required as part of the legal agreement. This will ensure co-ordination across local development sites as well as ensuring that the timings of key stages of work are communicated effectively. It will also be an important group for the delivery of the objectives of the community safety and community outreach plans, which will also be secured via the legal agreement. There is also a requirement for the applicants to test the feasibility of the use of the canal to transport spoil and materials as per the request from the GLA.

17.35 The Council would expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. This is very important due to the location of cycle and pedestrian routes adjacent to the site. The contractor would need to register the works with the Considerate Constructors' Scheme. The contractor would also need to adhere to the CLOCS standard.

17.36 The development, if approved, would require significant input from Council officers, local residents and other stakeholder, as discussed below. This would relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the CMP during demolition and construction. A CMP implementation support contribution of £28,520 would be secured via a Section 106 planning obligation if planning permission were granted.

St Pancras hospital liaison safety group and neighbour management plan

17.37 As set out earlier in the report, the inpatient services from the wider hospital site will be relocated prior to the construction. However, it may remain the case that some services will continue from the wider hospital site until it comes forwards for development as part of a separate application. The St Pancras Hospital partners have already signed their own co-operation agreement that would oblige them to co-ordinate timings and activities so as to minimise disruption. Notwithstanding, it is important that mitigation is secured as part of this permission which requires a specific group to be set up that specifically considers and monitors the construction phase details from the perspective of the safety and experience of patients.

17.38 In addition to the aforementioned Construction Management Plan and Construction Working group, the applicants have therefore also accepted an obligation for a 'St Pancras hospital safety group'. This would be made up of representatives from St Pancras Hospital (to include the St Pancras Hospital Transformation Programme Director, the St Pancras Hospital Director of Nursing, the St Pancras Hospital Medical Director, the St Pancras Hospital Transformation Director of Operational and Service Redesign, the St Pancras Hospital Associate Director of Estates and Facilities). The group's remit would be for the purpose of monitoring, managing and addressing the potential and actual impacts of the Construction Phase on the healthcare services provided and medical uses carried on at the St Pancras Hospital Buildings on behalf of the Camden and Islington NHS Foundation Trust. The outcomes and recommendations from this group shall form a 'St Pancras hospital neighbour management plan' which will also be required to be submitted to the Council prior to construction of the new building to evidence that the objectives of preventing / minimising impacts have been agreed and achieved. These obligations form part of the legal agreement.

Construction impacts bond

17.39 Construction activity can cause disruption to daily activities, however a well-run site that responds to the concerns of residents can greatly improve the situation. While most sites deal quickly and robustly with complaints from residents, and reinforce the requirements of the Construction Management Plan with site operatives, there can be situations where this does not occur and officers in the Council are required to take action.

17.40 Camden Planning Guidance (Developer Contributions) states that "In respect of developments raising particularly complex construction or management issues where the Council will have to allocate resources to monitor and support delivery of obligations the Council may require payment of an upfront financial bond which the Council can draw upon if needs be." A construction impact bond of £30,000 would therefore need to be secured via a Section 106 planning obligation.

17i) Excavation in close proximity to the public highway

17.41 The proposal would involve basement excavations in close proximity to the footway directly adjacent to the site. We have to ensure that the stability of the public highway adjacent to the site is not compromised by the proposed basement excavations. The applicant would be required to submit Approval In Principle (AIP)

reports to our Highways Structures & Bridges Team within Engineering Services as a pre-commencement obligation. This is a requirement of British Standard BD2/12. The AIP reports would need to include structural details and calculations to demonstrate that the proposed development would not affect the stability of the public highway adjacent to the site. The AIP would also need to include an explanation of any mitigation measures which might be required.

17.42 A Permanent Works AIP report is required for the final design, however, depending on construction methods, further Temporary Works AIP reports may also be required for any temporary piling or retaining walls required during excavation and construction. The AIP report and the associated assessment fee (circa £1552.95 + VAT) for the Permanent Works AIP would need to be secured as section 106 planning obligations if planning permission is granted. A pre commencement condition should also be secured to ensure that the applicant and the construction contractor liaise with the councils Structures Manager to determine if a Temporary Works AIP report is required.

17j) Transport Conclusion

17.43 The proposal would be acceptable in terms of transport and any planning approval will be subject to conditions and the following planning obligations being secured by legal agreement:

- A condition securing the following provision of 407 CPG Transport compliant long stay cycle spaces (within cycle parking area)
- A condition securing the provision of 112 CPG Transport compliant short stay cycle spaces within the site
- A condition securing the provision of changing facilities, showers and lockers associated with the cycle provision
- Car free development
- Strategic Level Travel plan and associated monitoring and measures contribution of £9,762
- Delivery and Servicing Management Plan
- Car Parking and Patient Drop off Management Plan
- Highways contribution – £157,462.75
- Pedestrian, Cycling and Environmental Improvements contribution of £206,000 (to include cost of junction upgrades and greenline)
- Construction management plan (CMP) and CMP implementation support contribution of £28,520; to include Construction Working Group and St Pancras safety / liaison group requirements as well as exploration of use of canal for logistics;
- Construction Impact Bond of £30,000
- Permanent Works Approval In Principle (AIP) (£1864)
- Legible London signage, to be developed further with TfL to test innovative options (£tbc);
- A pre-commencement condition requiring the applicant and construction contractor to liaise with the council's Structures Manager on whether a Temporary Works AIP is required and to establish the number of Permanent Works AIPs required

17.44 Subject to this mitigation being secured, the development is considered to remain in accordance with the transport policies within the development plan.

[Link to assessment content table.](#)

18 Canal Bridge

18.1 As set out in the previous section, in order to reduce the risk of visitors to the site relying on private taxi trips, it is important that the development contributes towards the enhancement of local walking and cycling infrastructure.

18.2 Whilst the Regent's Canal is a fantastic asset, it does also create a barrier to movement, particularly east/west movements. As set out in the emerging area framework document, the Council considered there to be an identified strategic need for a new pedestrian and cycle bridge between within the vicinity of the site. This would significantly reduce the walking time between, for instance, Kings Cross Central and Camden Town / Somers Town and promote the use of sustainable modes of transport. Accordingly, planning approvals at 101 Camley Street, the Travis Perkins and the UBB site have included provision for a new footbridge that would span the canal and connect to Granary Street, just to the east of the Oriel site. These permissions included capital contributions towards the delivery of this infrastructure, and this money has already paid for design work to commence and discussions are already being held with the Canal and Rivers Trust, who have shown initial support for the proposal.

18.3 Given the number of walking and cycling trips generated by the proposed scheme, it is reasonable that this development should also contribute towards this adjacent piece of strategic infrastructure. The footbridge would provide a high quality route that would link together the Kings Cross Central site (and Kings Cross beyond) to Camden Town in the West. Whilst the route would be more appropriate for staff and students (who would have the benefit of knowing the area to a better degree and so would be able to navigate the route more easily, the bridge will still be of major benefit to the operation of the new facility. The monies secured from permissions on surrounding sites so far are insufficient to cover the full cost of the new bridge, with an estimated £1m still outstanding. Whilst the final amount remains under negotiation at the time of writing, it is expected that the development will provide a contribution that (along with other contributions expected from other nearby development sites such as along Camley Street and the wiser hospital), ensure that this bridge remains deliverable. The necessary contributions would be secured by Section 106. Details of material specifications and detailed layout arrangements for the bridge still require further development and discussion with Camden Design Officers and our Transport Strategy Service, though a formal planning application is expected within the next few months.

[Link to assessment content table.](#)

19 Land contamination

- 19.1 A Contaminated Land Assessment, including geotechnical and geoenvironmental desk studies has been submitted as part of this application and was reviewed by Environmental Health officers (EHO) for consideration of risk of contamination.
- 19.2 Given the historic uses of the site, the proximity to the main railway cuttings for Kings Cross and St Pancras stations, the local geological makeup as well as the age of the buildings within the site this report identifies and tests against a number of possible sources for contamination. This has tested against users and staff members of the scheme as well as construction workers as primary receptor groups.
- 19.3 The Geotechnical and Geoenvironmental Desk Study Report successfully identifies the potential risks present on site and the need for further investigation/potential remediation. It is noted that site specific investigations have not been possible whilst the existing site remains in operation. As such, the plan of action set out in the report is supported. It requires that all relevant findings, related remediation processes, and verification reports are shared with the Local Planning Authority (LPA) for approval. The areas of interest include:
- Land contamination
 - Asbestos
 - Radon
 - Unexploded Ordnances
- 19.4 The condition will also require that, should investigations determine a likelihood of presence, further details in the form of remediation strategy and confirmation of remediation will be required. Given the level of risk identified, officers considered that the application of conditions to secure the above is sufficient to mitigate against this potential risk and safeguard the health and safety of future receptors from the site.

[Link to assessment content table.](#)

20 Basement impact

- 20.1 Policy A5 (Basements) states that the Council will only permit basement development where it is demonstrated that it will not cause harm, structurally, in amenity terms, environmentally or in conservation/design terms.
- 20.2 The proposal would involve site excavations to form a lower ground floor level across the footprint of the building. Due to the sloping nature of the site, this level would be at the same level as the street and entrance to the west (grade level), but would become subterranean to the eastern half of the plan as the surrounding grade level rises above it. The partial basement, partial lower ground floor would not include any areas of 'double height' basement, though as per the rest of the development the floor to ceiling heights would be c.4.2m. In total, the development would therefore involve excavations to a maximum depth of 7m taking account of retaining structures. The subterranean areas of this floor would be include a

mixture of spaces such the cycle store, showers and changing areas, plant room and stores.

- 20.3 The development site is subject to a number of underground development constraints including slope stability and ground water flows. In addition, the development site sits adjacent and within close proximity to the remaining buildings within the St Pancras Hospital (some of which are of heritage value as previously discussed) as well as public footway and highways. The site's archaeology value is discussed earlier in the report and all basement works would be subject to the mitigation previously discuss in this regard.
- 20.4 The application was accompanied by a Basement Impact Assessment (BIA) which has been produced by suitably qualified engineers in line with the Council's guidance. The assessment determined that the development posed no risks in terms of flooding from surface water and groundwater. It also noted that, as long as the excavations include specialist temporary bracings to add extra rigidity and structural support, the works should not result in ground movement that might cause damage to surrounding structures beyond that which is set out in the policy (Burland Scale 1). However, the report and assessment prepared has been based upon desk-top review and historic bore-hole evidence from nearby sites. This was due to the fact that in the last year, access into the hospital to undertake trial boreholes for site specific ground investigations have not been possible, with the C&I Trust needing to prioritise the safety and well-being of the patients who have remained onsite.
- 20.5 The submitted assessment was the subject of an independent review by the Council's basement consultant (Campbell Reith). Following requests for clarifications and the provision of additional analysis, they concluded that the submitted BIA evidence is adequate and in accordance with policy A5 and guidance contained in CPG4 (Basements and Lightwells) 2015, subject to the completion of a Basement Construction Plan (BCP), which is required by S106. Despite the lack of site specific ground analysis, the evidence provided has satisfactorily demonstrated that the conditions of the site and methodology proposed would mean that there is no reason to believe that, subject to considered methodology and design (secured by condition and s106), the excavations would cause adverse harm in line with the local plan definition.
- 20.6 Although Campbell Reith conclude that the BIA is satisfactory to progress to a planning approval, this would be subject to securing appropriate mitigation. This would include an obligation for a basement construction plan, as well as conditions for details and responsibilities of the onsite basement engineer to be submitted and approved prior to excavations commencement. In addition, an obligation requiring the early completion and submission of an 'Approval in Principle' report is to be added to ensure that the relevant approvals from the Local Highways Authority to excavate close to the public footway and highway are obtained prior to excavations commencing.
- 20.7 The basement construction plan will require the applicant to undertake site specific ground investigations once full access to the site is possible, and then to review the modelling to ensure that the risks of adverse ground movement remains in line

with the desktop analysis. This would also oblige the applicants to instruct an additional specialist to review these findings and prepare a report that confirms that the final design of structures and construction methodology would remain in line with the policy requirements. This final report will be reviewed by Campbell Reith before any excavations works may begin.

- 20.8 Subject to the aforementioned conditions and legal obligations, the applicant has satisfactorily demonstrated that the proposed basement would not cause harm to the built and natural environment and would not result in flooding or ground instability in line with policy requirements.

[Link to assessment content table.](#)

21 Air quality

- 21.1 Camden Local Plan policy CC4 is relevant with regards to air quality. This requires the submission of air quality assessments for developments that could cause harm to air quality. Mitigation measures are expected in developments located in areas of poor air quality.
- 21.2 An Air Quality Assessment (AQA) has been submitted as part of this application that has been produced by specialist consultants. This has included monitoring of the site to conclude the baseline position and has then considered the impacts from both the construction and end use of the building on surrounding sensitive receivers as well as future users of the site. This has included an Air Quality Neutral Assessment, which assesses the overall effects of the development on local conditions. This report was reviewed by the Council's Air Quality officers.
- 21.3 The submitted reporting shows that, once constructed, the proposed development would not exacerbate local air quality levels. The operational impacts should remain below the existing baseline, including those from transport, meaning that the assessment shows a neutral impact to the baseline conditions. The completed scheme would therefore not cause adverse impacts to the sensitive receptors within the local area, nor future users of the site.
- 21.4 As will be detailed in the following energy section, the building has been designed to be fully electric, avoiding the need for combustion for any of the heating or power systems. The only exception to this would be for emergency oil/diesel generators, which will only function in the case of any emergency power outage. Given the sensitive use of the site, which would include clinical treatment and research, the need for these emergency generators is accepted. Conditions for full details of the emergency generators once they have been specified, including their final emission details, are recommended to ensure that even in emergencies this plant equipment does not result in a detrimental impact to local air quality.
- 21.5 Similarly to the above, the development would form a sealed internal environment and would utilise a mechanical ventilation system for internal air flows. Whilst natural ventilation would be encouraged by policy, it is noted that the specific requirements of the NHS facility and lab spaces would prevent such provision in

this instance. Notwithstanding the energy usage consideration, from an air quality perspective it is accepted that the HVAC system would include adequate filtration systems to ensure that internal air quality remains high. Conditions are however recommended for full details of this system, including its air inlet locations.

- 21.6 The report has also acknowledged that, unless carefully managed, the construction phase has the potential to cause localised impacts to air quality particularly through increases in particulates. It therefore recommends a range of mitigation measures to alleviate this risk, including real time monitoring. This mitigation is welcomed and it is noted that these would be secured as standard as part of the Construction Management Plan requirements. Further conditions are still recommended though for monitoring above the standard CMP requirements, and also to prohibit the use of construction machinery that do not conform to adopted standards for central London major development sites.
- 21.7 Subject to securing the aforementioned mitigation via conditions and the legal agreement, officers remain satisfied that the development would accord with the requirements of policy CC4.

[Link to assessment content table.](#)

22 Sustainable design and construction

- 22.1 The Local Plan requires development to incorporate sustainable design and construction measures, to ensure they use less energy through decentralised energy and renewable energy technologies. All developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy (be lean, be clean and be green) to reduce energy consumption. Policies CC1 and CC2 of the Local Plan require development to minimise the effects of and be resilient to climate change and to meet the highest feasible environmental standards. Developments must achieve a 20% reduction in CO₂ emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible. They are also expected to achieve a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%). These policies expect developments to achieve a minimum 35% reduction in regulated CO₂ emissions below the maximum threshold allowed under Part L of the Building Regulations 2013. Where the carbon reduction target cannot be met on-site, the Council may accept a financial contribution (charged at £95/tonne CO₂/year over a 30-year period) to secure the delivery of carbon reduction measures on other sites. In addition, policies from within the New London Plan also require the consideration of a Whole Life Carbon analysis, as well as a Circular Economy principles.
- 22.2 Throughout the design process, officers from the Council's and GLA's sustainability teams have provided guidance and this has been used to inform the submission scheme. This included dedicated sessions on energy strategy, building fabric design (to inform the be lean approach), as well as opportunities for local heat capture. In addition, following an initial review of the submission Energy Strategy and Sustainability Statements, further evidence was requested and

received in the form of technical notes, a whole life carbon assessment as well as further clarity and details of feasibility studies.

- 22.3 As aforementioned, the site is highly accessible by public transport (PTAL 6b – highest) and represents a key site within the Knowledge Quarter. The site is therefore well suited for a sustainable re-development of this nature.
- 22.4 Whilst it is accepted that the existing buildings onsite offer little opportunity to be retained and reused, the proposed development has been designed with principles of the circular economy at its heart. Although the applicants see the new building as their flagship facility and permanent home moving forwards, the building has been designed in such a way so that it could be converted into a range of alternative uses in the future, including other commercial or hotel type uses. In addition, the construction of the building has also been informed by the circular economy principles, with an extremely robust core and super structure, but internal plans and façade system that would facilitate flexibility in their fit out, off site construction and unitised cladding systems. This would mean that panels of the façade as well as specifications for internal spaces can be altered or replaced to meet changing future needs easily and effectively, minimising wasted resources and speeding up the construction phase. The development is therefore considered to accord with the circular economy principles set out in the New London Plan.

Sustainability

- 22.5 Policy CC2 sets an expectation for major, non-residential buildings to achieve a BREEAM Very Good (minimum) rating, aspiring to 'Excellent' and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).
- 22.6 The submitted sustainability assessment includes a BREEAM pre-assessment which finds the development achieved an overall score of 77.5% which would meet the requirements to be at least BREEAM excellent (70%). In addition, the requirements for credits in all categories would exceed the policy requirements as set out below:
- Energy: targeted 17 out of 24 available credits = 70.8% which meets the 60% minimum requirement
 - Water: targeted 7 out of 9 available credits = 77.8% which meets the 60% minimum requirement
 - Materials : targeted 12 out 14 available credits = 85.7% which meets the 40% minimum requirement
- 22.7 The design has also incorporated green/brown roofs wherever practicable at roof level. Whilst this is confined to the areas above the central Oriel tower this still represent a sizeable area (approx..240sqm) that would help with water management and provide habitat potential. Full details for the specification of these areas will be secured via condition. Although it was accepted that grey water systems for the main building could not be provided, a condition for rain water harvesting at the roof level garden to minimize water demand is recommended.

Energy

- 22.8 Overall, the energy statement shows that the development would deliver a total saving of 27% below the baseline of Part L requirements (reduction from 1401 to 1017.3 tCO₂). This fails to meet the overall expectation of a 35% reduction. In addition, when considering the 'stage reductions', whilst the specific targets for the Be Lean stage have been met (15% saving achieved), a saving of 14.5% is made at the Be Green stage (i.e. through onsite renewables) which is below the target of 20% for that stage. In order for the development to be considered 'net zero', a carbon off set contribution is therefore suggested. In accordance with the adopted rates for carbon offset, this would necessitate a final contribution of £2,899,305 which can be used to help fund carbon saving or sustainability projects locally.
- 22.9 Prior to accepting this form of mitigation to ensure a net zero carbon scheme, officers have required the submission of robust and in depth feasibility studies to demonstrate that the savings identified represent the maximum that are achievable.
- 22.10 Overall it is acknowledged that the applicants have gone to great lengths to explore all avenues to increase these savings further and that the current proposal would still represent a highly innovative example of sustainable design which has acted to minimise its energy usage and reduce carbon emissions. The main reasons that prevent further savings despite these solutions is the very high energy demand generated by a facility of this nature, which would include a vast array of specialist equipment and is required to maintain an internal environmental which provides comfort for patients and stability for the research lab areas.
- 22.11 Despite the shortfalls, the energy strategy is still welcomed. The building has been specified to be fully electric, with low energy lighting solutions throughout to bring down its operational demand. A highly innovative provision of closed loop ground source heat pumps are proposed, representing the first time such technologies have been implemented for such a facility or by the NHS. Together with a large number of air source heat pumps, these will act to reduce peak heat and cooling demand and significantly lower the overall energy demand. Opportunities for onsite renewable electricity production have been maximised via the use of photovoltaic cells at roof level. In addition, a high performance exterior envelope would ensure that energy is not wasted, complying with a fabric first approach. Although the modelling shows that there is limited scope for the development to provide excess heat to neighbouring developments (requiring all of the heat from the ground and air sources), the building would also be specified to accommodate future heat networks, with areas retained for plant and break through points in the façade maintained. The applicants have also made formal commitments for the ongoing monitoring of the performance of the building once it is in operation (to accord with the 'Be Seen' requirements of the New London Plan). Conditions are recommended for the final details of rooftop PVs. In addition a final Energy Statement to be secured via legal agreement is recommended.
- 22.12 As aforementioned officer have worked with the applicants to explore all other options to further reduce the savings made. For instance, additional opportunities for the capture and reuse of thermal energy have been explored including both the combined sewer beneath St Pancras Way and the Regent's Canal as potential sources. Detailed feasibility studies of each have been provided along with details

of correspondence with Thames Water and the Canals and Rivers Trust. Whilst the potential for use of the sewer was discounted by Thames Water, the canal is shown to still hold further potential and so it is expected that further testing and negotiation with the C&R Trust will be undertaken to inform the final energy strategy (secured by means of legal agreement). Whilst the predicted overall saving is not huge, this should still be further explored given the shortfalls. Any further carbon savings achieved at the detailed design stage will also lower the required off-set contribution.

- 22.13 Overall officers conclude that, subject to securing final energy and sustainability statements and carbon off-set contribution of up to £2,899,305 via legal agreements as well as the aforementioned conditions, the scheme would represent a net zero carbon development and would meet the requirements of policy. Any further saving made during the detailed design stage would be reflected in the final contribution amount.

[Link to assessment content table.](#)

23 Flood risk and drainage

- 23.1 Camden Local Plan policy CC3 seeks to ensure development does not increase flood risk and reduces the risk of flooding where possible. The NPPF requires all major developments to include Sustainable Urban Drainage Systems (SuDs) unless demonstrated to be inappropriate (as set out in the Ministerial Statement by the Secretary of State on 18 December 2014). Major developments should achieve greenfield run-off rates wherever feasible and as a minimum 50% reduction in run off rates. Development should also follow the drainage hierarchy set out in the new London Plan.
- 23.2 The development site is not located within any flood risk zone as defined by the environment agency, though St Pancras Way to the west of the development site is included within a Local Flood Risk Zone due to the evidence of previous surface water flooding occurring during storm events. This area is at 'medium' risk from flooding (exceeding capacity in a 1 in 100 year storm event). As discussed earlier in the report, the existing site is primarily occupied by built form or hard-surfacing, with less than 10% of its area being permeable. There is no current provision to slow run off and surface water currently drains into the combined sewer below St Pancras Way.
- 23.3 In support of drainage and flooding aspects of the proposal the applicant has submitted a Flood Risk Assessment and Drainage Strategy as well as a Geotechnical and Geoenvironmental Desk Study. This includes a full surface water drainage statement and micro drainage calculations for run off rates. Since first submission, these reports have been reviewed by the Council's Lead Local Flood Authority (LLFA) and the GLA's Water & Green Infrastructure team. Following the request for more details to be provided, a series of separate addendums reports have also been provided, along with further details of the discussions held with Thames Water to date with regard to drainage capacity.

- 23.4 Thames Water has also been directly consulted as part of the application. It confirmed that no objection was raised to the proposal, though it has requested conditions be applied that would require the applicants to work up further details of necessary drainage infrastructure along with Thames Water and for the works to be completed. The recommended conditions are included in line with their requests.
- 23.5 The levels of the proposed building have been designed such that the thresholds at the lowest point of the site (SW corner) would be sufficient to avoid internal flooding in the event of a storm overwhelming the sewage capacity beneath St Pancras Way. The new building is therefore not considered to be at risk of future flooding.
- 23.6 It is also expected that the development will ensure that it does not increase the risk of future flooding via an effective drainage strategy. The proposed building would occupy the majority of its plot, with much of the remaining curtilage being hard surfaced to form a public walking route and spaces. This will result in the overall impermeable area within the site being increased by approximately 0.08 hectares, meaning that mitigation is required to reduce run off rates in line with the drainage hierarchy. This is proposed to consist of two main elements, the use of permeable paving to areas of public realm and an attenuation tank beneath the footway adjacent to St Pancras Way near the drop off area. In addition, the areas of green and brown roofs will also help to absorb rain fall and slow the run off rates to the mains sewer.
- 23.7 The submitted reporting would show that the mitigation measures proposed would result in an overall reduction in run off rates to c90% below existing rates, (a fall from 137.6l/s to 11.2l/s). Despite this sizable reduction, the rates would still be greater than the target of green field run off rates (2.9l/s). However, it is noted that the applicant has followed the drainage hierarchy and officers conclude that the reduction would constitute the lowest reasonable discharge rate. Whilst a preference for a rain garden to be introduced as an additional measure was initially raised, early feasibility testing shows that this would require landscaping at, or below ground level with a drop formed to channel run off water. This would have to be positioned next to the patient drop off area and, given the sensitive use of the site, this was not desirable from a pedestrian safety perspective as it would cause a trip hazard in an area that will have heavy foot fall traffic. Instead, planters will be raised with suitable seating and lighting to ensure that they are obvious and do not form trip hazards. Similarly, trees will be specified with level surfaces (using products such as bonded resin/gravel) to ensure they do not create trip hazards.
- 23.8 Overall it is considered that the submitted reporting suitable demonstrates that the proposed development will not be at risk of flooding, and that subject to securing further details via condition, it will actively reduce the risk of flooding to nearby streets as far as practicable in line with the drainage hierarchy. The development is therefore considered to comply with policy CC3.

[Link to assessment content table.](#)

24 Safety and security

- 24.1 Camden Local Plan policy C5 (safety and security) and CPG1 (Design) are relevant with regards to secure by design and require developments to demonstrate that they have incorporated design principles that contribute to community safety and security.
- 24.2 In response, the submitted Design and Access statement includes a full review of the access arrangements into and around the facility, inclusive design, security and evacuation procedures. In addition, a Designing out Crime statement has been produced that considered the security rating of the building and sets out the ways in which it has been designed to protect its future users.
- 24.3 The design of the scheme has been reviewed and negotiated alongside the Metropolitan Police Designing Out Crime Officers (DOCO) and The Council's Community Safety Team throughout the pre-app and formal submission stages. This included dedicated sessions at pre-app stage, where early feedback was used to highlight areas of potential concern so that they could be designed out in advance of submission. In particular, the specifications of entrance doors and undercroft areas leading to waste and cycle facilities were amended to ensure that they would not provide opportunities for loitering and clarifications with regard to the management of internal areas. Further clarification has also been provided following submission via the exchange of additional technical notes on security arrangements.
- 24.4 The final scheme has therefore considered the safety and security aspect of the proposed development from a number of different perspectives including:
- Ensuring that the new development designs out opportunities for crime and anti-social behaviour;
 - Ensuring that the new building and surrounding public realm is designed to prevent opportunities for attack, including from hostile vehicles;
 - Ensuring that the design of external areas contributes towards an enhanced sense of safety;
 - Providing details of the security arrangement to ensure the safety of staff members and patients (including arrangements for patients who are VIPs);
 - Systems in place to ensure that the building contains adequate layers of security to prevent internal or remote attacks; and
 - Specification details of internal security systems, barrier and control points as well as measures for deliveries.
- 24.5 It is noted that the scheme has maximised opportunities for the provision of active frontages that will create natural surveillance to areas of public realm. Due to the nature of the development, the development would also feature around the clock security presence. Internal routes would be controlled such that access via fob would be required out of hours and that these areas would be monitored by the onsite security team from dedicated security areas. Anti-collision barriers have been specified around the perimeter of the site and public realm to prevent hostile vehicles entering the site. As detailed in the design section, final details will be

secured by condition, but these have been suitably specified from a safety perspective.

24.6 The Designing out Crime officers confirm that they raise no objection to the proposed scheme. It was recommended that the permeability of the public route through the site be managed so that out of hours access is not afforded and this is confirmed by the applicants. Given the sensitive nature of the proposals, some of the details have been provided to the council and designing out crime officers remain sensitive in nature. For clarity 'normal working hours' relates to the core hours of operation, being between 6am – 11pm daily, though parts of the development (e.g. eye care A&E and security areas) will remain operational 24/7, but with controlled access. During the 'core hours' (6am-11pm), pedestrians will have free access into the building from either of the two main entrances at the Ground and Lower Ground levels, with wayfinding directing them to their appropriate destination. Outside of 'core hours' (11pm-6am), any member of the public wishing to access A&E will use the south-western, Lower Ground entrance adjacent to a security booth. These arrangements are to be secured as part of the Community Safety Plan within the S106 legal agreement.

24.7 Consequently, the submitted reporting is considered to set out appropriate measures and design principles to ensure that the new facility is safe and secure. In order to ensure that this is delivered onsite, an obligation for a 'Community Safety' plan is recommended as part of the legal agreement. This will require the submission of a final plan setting out how the development would be designed as an environment that feels safe and welcoming by day and night, to be worked up with surrounding landowners, local businesses and other community safety stakeholders. It will include full details of measures such as CCTV, management arrangements, and evidence of compliance to the Gold standard Designing out Crime measures on doors, gates and access control points. This will also need to set out how, through raising local awareness and understanding of community safety arrangements within and around the Development, the routes to and from the site will be enhanced from a safety perspective. This will be particularly key for more sensitive users. Subject to securing this obligation, the development is considered to comply with the requirements of LP policy C5.

[Link to assessment content table.](#)

25 Waste management

25.1 A full assessment of the servicing, waste and recycling strategy for the proposal has been provided in the form of various reporting (e.g. operational recycling and waste strategy, deliveries and servicing plan and circular economy statement). Pre-app meetings with the Council's Environmental Services Officers were used to develop this strategy and these officers have also reviewed the final details provided. As detailed in the transport section, considerable attention has been paid to the combined servicing and deliveries bay that would be accessed via Granary Street. This area would accommodate all servicing needs of the building, other than infrequent deliveries of oil which will only occur outside of peak times as secured by the servicing plan. It is worth noting that the building will require the

use of large volumes of compressed gas, and the design team have gone to great efforts to ensure that these can be incorporated within the envelope of the building.

- 25.2 Officers conclude that the strategy proposed is exemplary, comprehensive and should act as a benchmark for future developments incorporating health care uses. The development is considered include adequate facilities for the storage and collection of waste and recycling, and these have been robustly tested to ensure they will meet operational requirements and that there are adequate suppliers who will be able to provide collection services to meet the specific needs of the development.
- 25.3 The detailed strategy contains measures for all the waste streams identified and successfully applies the waste hierarchy and circular economy principles to demonstrate how the proportion of waste will be minimised and the proportion of recycling or reuse will be maximised. The strategy is also accompanied by correspondence from the NHS Director of Estates which confirms the commitments made in terms of delivering improvements in the management and reduction of clinical waste and the supply chain. Subject to the measures and commitments set out in the reporting being secured by means of condition as well as the obligations under the servicing and deliveries plan, the development is considered to remain in accordance with policy CC5.

[Link to assessment content table.](#)

26 Economic Benefits, Local Employment and Procurement

- 26.1 The proposed development will significantly contribute towards the Borough's economy. It will lead to a sizeable creation of both direct and indirect jobs through both the construction and end use, as well as advancing the role and significance of the growing concentration of knowledge economy businesses and organisations located within the Knowledge Quarter, which has already developed into a world-leading centre of research and innovation. These economic benefits are duly noted and welcomed. A large number of jobs will be transferred from the existing facilities but there will still be a net uplift as a result of the investment. It is also noted that the NHS is governed by stringent equal opportunities policies when recruiting, meaning that negotiation of the final contributions towards end use placements remains ongoing.
- 26.2 Notwithstanding, Local Plan policies E1 and E2 and supporting Guidance state that in the case of such developments the Council will seek to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services. As a key knowledge quarter use, it's important that local people benefit from the jobs created by the organisations based within it. The Council is also keen to ensure that the development provides pathways into science and research careers for the local community. This would include building young people's aspirations for careers in these sectors through our Camden STEAM programme, and providing links into quality jobs through Good Work Camden. Furthermore, these policies

also stipulate that opportunities for local residents should be secured as part of the construction phase.

- 26.3 In light of the above, a range of training and employment benefits are to be secured, in order to meet the policy requirements by providing opportunities during and after the construction phase for local residents and businesses. This package of recruitment, apprenticeship and procurement measures will be secured via S106 / condition and will comprise of the following:

Local employment, skills and local supply plan:

- 49 construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre;
- 87 construction apprentice of 52 weeks (based on anticipated build cost of £260m) paid London Living Wage as well as a support fee of £1,700 per apprentice (total £147,900);
- To adhere to the Camden Local Procurement Code;
- Recruitment for construction-related jobs to accord with Construction Industry Training Board (CITB) benchmarks for local employment
- All construction vacancies and work placement opportunities to be advertised exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- Minimum of 2 supplier capacity building workshops to support small and medium enterprises being incorporated into the supply chain;
- End use apprenticeships paying at least London Living Wage and end use work placement opportunities (exact number tbc).
- The applicant should support the Good Work Camden programme and make the following commitments
 - Join the Inclusive Business Network
 - Advertise vacancies in partnership with Good Work Camden and its relevant local employment support providers to create pathways into knowledge economy jobs
 - Promote employee mentoring and volunteering within Camden
 - Commitment to attend job fairs to promote opportunities to local residents
 - Commitment to providing supported employment opportunities – e.g. supported internships
- The applicant should commit to supporting the Camden STEAM programme and signing the Camden STEAM employer pledge

Financial contribution:

- Due to the scale of the development, a financial contribution is expected. This will be used to support initiatives which create and promote employment and training opportunities and to support local procurement initiatives in Camden. The expected contribution is calculated at **£428,997.00** in line with adopted guidance and policy E2.

26.4 The obligation will require the above to be worked up in greater detail / final options to be agreed alongside the Council Inclusive Economy team prior to the first operation of the facility. The applicants have already begun this discussions and all partners remain highly committed to delivering local employment and experience opportunities. The proposals are therefore in accordance with the guidance set out in CPG5 and policies E1 and E2 of the Camden Local Plan.

[Link to assessment content table.](#)

27 Fire safety

27.1 Policy D11 (Fire safety) of the New London Plan requires all major development proposals to be submit a Fire Statement. A Fire Strategy has been prepared by the applicant which suitably addresses the requirements set out in Policy D11 (Fire safety) relating to construction, means of escape, safety features and access for fire personnel. The documents state that their primary focus is to provide the key information to demonstrate how the functional life-safety requirements of the Building Regulations 2010 would be met. It sets out principles which will be the subject of further design development and consultation with stakeholders during the next round of design work, if planning is granted. A formal Fire Strategy would be prepared for approval through the Building Regulations process.

27.2 The principles set out within the submitted plan are all accepted and welcomed by officers. The councils Building Control team were also consulted and raised no objection to the principles set out. Accordingly, a condition is recommended requiring the submission of a final Fire Statement produced by an independent third party. It would be required to detail the final specifications of the building's construction, methods, products and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring and how provision would be made within the site to enable fire appliances to gain access to the building. The submitted details would be assets by the Council's Building Control department.

[Link to assessment content table.](#)

28 Equalities

28.1 Section 149 of the Equality Act 2010 sets out the Public Sector Equality Duty (PSED). A public authority must, in the exercise of its functions, have due regard to the need to:

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

28.2 Under the Equalities Act 2010 the nine protected characteristics covered by the general equality duty are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. People with common protected characteristics are often described as belonging to a protected group. As part of this application officers have considered equalities impacts, particularly on groups with protected characteristics. The findings of the applicants own Equalities Impact Assessment which was submitted in support of the application has also been duly considered.

28.3 The new facilities will be used by people of all characteristics, as eye conditions and diseases are universal in their affects. Accordingly, the development has been designed in line with inclusive design principles meaning that all users may access and avail of the facilities in an inclusive manner that would not discriminate against any group. Notwithstanding, as highlighted in the transport and access sections, the development would actively seek to enhance the ease of access to the site from local rail stations by active or sustainable means. Whilst these would benefit all users, they would be specified targeted towards disabled users in order to ensure that the barriers for opportunities between those within or outside of this protected group are removed by eliminating barriers for active travel. These enhancements would be consider beneficial when considering the overall equalities impacts.

28.4 Furthermore, officers have also paid special attention to the potential impacts of users who make use of both the existing City Road as well as St Pancras Hospital sites from within protected groups. It is noted that impacts of the relocations and proposed development have the potential to disproportionately affect those within protected groups (in particular older or disabled users). However, a range of measures would be secured to ensure that this will not be the case. Firstly, through the obligations set out within the legal agreement as well as the co-operation agreement between the St Pancras partners, construction of the new development would not commence until vacant possession of the development site is obtained as well as all inpatient facilities relocated off the wider hospital site. Secondly, to ensure that the services that would remain on the wider St Pancras site can continue safely and maintain their standard of care, obligations to careful construction management, including a specific group of clinical staff members to provide oversight. Thirdly, the obligations made would also ensure that the facilities at City Road would continue to remain in operation until the new building is fully complete, ensuring no break in service provision.

28.5 It is noted too that the relocation of services will also cause some effect, with regular patients having to re-learn travel patterns to the new facilities. This too has the potential to cause disproportionate impacts to these same protected groups.

However, the conclusions in terms of the appropriateness of the site, its accessibility and the enhancements secured for active and sustainable transport, these affects would not be great, would remain temporary in nature whilst the new habits are developed and would also be outweighed by the significant long term improvement in the facilities on offer. This would apply to users of both Moorfields and the existing St Pancras hospital site.

- 28.6 Overall the development would not cause any discrimination against any particular protected group to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and to help foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

[Link to assessment content table.](#)

29 Planning obligations

- 29.1 Throughout the report, various instances are highlighted where mitigation is required to ameliorate the impacts of the proposed development such that it remains compliant with the development plan. In accordance with section 106 of the planning act, where such mitigation cannot be secured by means of condition, they must be included as 'Heads of Terms' embodied with a legal agreement. Based on the findings of the above assessment, the followings Heads of Terms will be included in such an agreement:

Head of term	Expected capital contribution
Highway / Transport	
Approval in principle report + fee	£1,864
Bus route enhancement contribution	£tbc
Car free development	-
CMP + implementation support fee	£28,575
CMP bond	£30,000
Delivery and Servicing Management Plan	-
Drop off, colonnade and parking management plan	-
Highways contribution	£157,463
Last half mile 'Green line' plan (capital sum incorporated into PC&E)	-
Legible London wayfinding solutions	£tbc
Levels plan	-
P, C & E contribution	£206,000
Regent's Canal footbridge contribution	£tbc
Stopping up plan and implementation fee	£25,000
Travel Plan and monitoring contribution	£9,762
Travel plan monitoring fee	£9,762
Social / community	
Community Outreach Plan	-

Community Safety Plan	-
Public Art Plan	-
<i>Environmental</i>	
Energy Efficiency and Renewable Energy Plan	-
Sustainability Plan	-
Future proofing for decentralised energy network	-
Carbon Offset Contribution	£2,899,305
<i>Employment and training</i>	
Employment and Training Plan	-
Employment contributions support	£428,997
Construction apprentice support contribution	£147,900
Construction apprentice default contribution	£609,000
<i>Other</i>	
Phasing and decant plan	-
St Pancras liaison group, safety group and neighbour management plan	-
Detailed basement construction plan	-
Public Realm Plan	-
Keep clear agreement (to maintain continuous public access to all areas of external public realm)	-

29.2 The obligations sought are all considered fully relevant to the proposed development, necessary for compliance with the development plan and proportionate to the impacts resulting from the scheme. The obligations listed above are therefore considered to adhere to the requirements set out in CIL regs.

[Link to assessment content table.](#)

30 CIL

30.1 Generally, the proposal would not be liable for the Mayor of London's CIL2 nor Camden's CIL as the proposed use is for research, medical and education purposes. The Mayor's charging schedule states that institutions of higher education have a NIL rate and the Council does not charge for health, education or community uses (among others).

30.2 The only acceptance to the above related to the proposed retail/food outlets at ground floor level. Although these commercial uses are, to some degree, ancillary to the main use of the building they would still be liable for CIL payment.

31 PLANNING BALANCE

31.1 In light of the main assessment, the proposed development has been found to remain in accordance with the majority of the individual policy requirements of the

Site Allocations Local Plan, Local Plan and New London Plan. The assessment has found there to be numerous areas in which there is a risk of potential harm, however, in all but a select few cases this is appropriately mitigated against via the range of conditions and obligations to be secured.

31.2 In summary, the main areas of residual harm caused by the development despite the mitigation secured are as follows:

- **Heritage impacts** – less than substantial harm to the special character and appearance of the Kings Cross St Pancras conservation area sub area 1. This is afforded significant weight;
- **Amenity impact** – some harm was also identified to surrounding residential amenity. This includes a loss of daylight to a ground floor window within a residential dwelling (no.7/7a St Pancras way) as well as more significant impacts to daylight to a range of windows that directly oppose the site within the student housing (no.11-13) and hostel (no.9). The harm to the dwelling was not considered significant given that only one bedroom at ground floor would be adversely impacted. The harm caused by the significant reductions to daylight in the student housing block are noted, though the transient nature of the accommodation means that this are afforded less weight. Similarly, significant impacts would be experienced to some of the windows to the hostel block, effective 8 individual rooms. Whilst this harm is again noted, this accommodation is also more transient in nature than a self contained dwelling and so again the amount of weight afforded is less.

31.3 Conversely, the proposed development is considered to also deliver a range of public benefits/ This includes brought direct and indirect benefits to the Borough, as summarised below:

- Major enhancements for the national provision of clinical eye care and enhancement of research to develop new treatments, helping alleviate the effects of an aging population by increasing health, wellbeing and independence;
- Facilitating the implementation of the strategy NHS service transformation plan for the North Central London health partners, by generating a capital receipt for C&I to be used to deliver new, purpose built mental health facilities as well as upgrading other existing facilities;
- A £200m investment within the Borough, delivering a world class health, research and education facility for the betterment of all Londoners (current and future) who suffer from eye diseases or conditions;
- Major enhancements of the role and significance of the Knowledge Quarter to the Camden and national economies;
- Provision of new public routes and public realm that would significantly improve pedestrian environment in the vicinity;
- Contribution towards to delivery of a new canal bridge, an identified piece of infrastructure of strategic importance;
- Economic opportunities for the Borough's residents and business community in both the construction and end phase via the training and employment opportunities created;

- A package of measures to improve the ease and comfort of public and active transport between the site and local rail stations; and
- Biodiversity net gains onsite through diverse planted areas both within the public realm and to the roof terrace; and
- Provision of a highly sustainable building.

31.4 When considering the balance between the identified harm and benefits delivered by the proposed development, it is considered that there is a strong and convincing justification for the development to be approved. In order to ensure that the public benefits derived from the health care, research and educational uses are delivered and retained as part of the composite mix, and to avoid an uncontrolled intensification of the use a condition is recommended for the quantum's figures set out within the approved areas schedule to be retained as a minimum.

[Link to assessment content table.](#)

32 CONCLUSION

32.1 The development is key to the implementation of the North London Central Health Partners strategic service transformation plan. Not only would it deliver a new, purpose built, facility for Moorfields and its partners, it would also facilitate major investments in facilities for mental health provision via the capital sales receipt for C&I. Subject to securing commitments made by both the Oriel partners and C&I to avoid any break in service provision, the development is therefore considered to not result in any loss of social infrastructure, community or health facilities. The redevelopment, and uses proposed would also accord with the requirements of the SALP. The development would therefore be strongly supported in principle. The impacts resulting from the construction phase and decant strategy for the existing uses would be very carefully managed and controlled via obligations within the legal agreement for construction and demolition management plan, to be co-ordinated alongside groups representing the St Pancras hospital users as well as a wider community working group.

32.2 The proposal is considered to represent a high quality, contextual design that responds to the site's characteristics, the surrounding pattern of development as well as the future use of the building itself. Its layout and the locations of entrance and servicing areas would successfully join up a network of routes that would transform the permeability of the site and wider area. The massing and heights have been shaped to respond to the local context, stepping down to the south to present a more neighbourly relationship with the key heritage buildings. This has been articulated further through sensitive detailing and treatments that would be robust, add interest and character and reflect the use of the building. It would also provide approximately 2000sqm of new public realm and net gains in the biodiversity value of the site.

32.3 Officers identify less than substantial harm to the special character and appearance of the Kings Cross St Pancras conservation area. No other heritage asset would experience harm to their significance or special character and appearance. Weighing the public benefits of the proposals against the duty

imposed by the Listed Building Act to give considerable importance and weight to avoiding harm to designated assets, officers recommend that the package of benefits which would accompany the proposed development would be sufficient to outweigh the harm.

- 32.4 The new facility would generate a significant number of trips to and from the site, both from staff and visitors but also for servicing and deliveries. As such the transport impacts and design response has been the subject of detailed negotiation. Subject to a range of conditions and obligations within the legal agreement, this is considered to remain in compliance with the adopted policy requirements. Some of the mitigation proposed will require further discussions and testing alongside TfL before final capital contributions are determined, though this approach is supported to ensure that the final solutions are as effective as possible. It is noted that the applicants remain in positive engagement with TfL to refine these solutions. In addition, the scheme would also provide a contribution towards the delivery cost of a new canal bridge, which is seen to be of strategic importance.
- 32.5 Despite its large scale, through the siting and positioning of heights and massing the development would minimise impacts to the amenities of neighbouring occupiers and the area. Some adverse loss of natural light and outlook would be experienced at properties which directly oppose the development site to the western side of St Pancras way, including self-contained dwelling at (7/7a) as well as the non-self-contained housing uses at no.9 (hostel) and no.11-13 (student housing at upper floors). These impacts are given moderate weight in the overall planning balance.
- 32.6 Following robust testing, the development was not found to cause environmental impacts of more than localised impacts. These impacts would be mitigated against via the application of conditions and requirements within the legal agreement for a range of measure relating to the construction and end use of the facility. The mitigation secured would ensure that the development would not result in environmental impacts that would cause determinate harm and to ensure compliance with the development plan.
- 32.7 The development would be highly sustainable in its design, construction and operation. Notwithstanding, in order to meet the expectations of the energy hierarchy an off-setting contribution would be required. This is primarily as a result of the intense energy requirements of the building. Through robust negotiation, officers accept that the scheme has maximised opportunities for carbon savings and so this offsetting contribution is accepted to ensure a policy compliant scheme. The issues raised by the Mayor in the Greater London Authority's (GLA) and TfL's Stage 1 letter have been addressed through further clarifications and measures which would be secured by s106 legal agreement or by condition. This includes the provision of a whole life carbon assessment.
- 32.8 When considering the overall planning balance of the assessment (further to the conclusions of the heritage balance exercise), subject to the recommended conditions and obligations the harm identified would be convincingly outweighed

by the public benefits delivered. Officers therefore recommend that conditional planning permission is granted, subject to a legal agreements

[Link to assessment content table.](#)

[Link to beginning of the report.](#)

33 **RECOMMENDATIONS**

33.1 **Planning Permission is recommended subject to conditions and a Section 106 Legal Agreement covering the following Heads of Terms:-**

Head of term	Expected capital contribution
<i>Highway / Transport</i>	
Approval in principle report + fee	£1,864
Bus route enhancement contribution	£tbc
Car free development	-
CMP + implementation support fee	£28,575
CMP bond	£30,000
Delivery and Servicing Management Plan	-
Drop off, colonnade and parking management plan	-
Highways contribution	£157,463
Last half mile 'Green line' plan (capital sum incorporated into PC&E)	-
Legible London wayfinding solutions	£tbc
Levels plan	-
P, C & E contribution	£206,000
Regent's Canal footbridge contribution	£tbc
Stopping up plan and implementation fee	£25,000
Travel Plan and monitoring contribution	£9,762
Travel plan monitoring fee	£9,762
<i>Social / community</i>	
Community Outreach Plan	-
Community Safety Plan	-
Public Art Plan	-
<i>Environmental</i>	
Energy Efficiency and Renewable Energy Plan	-
Sustainability Plan	-
Future proofing for decentralised energy network	-
Carbon Offset Contribution	£2,899,305
<i>Employment and training</i>	
Employment and Training Plan	-
Employment contributions support	£428,997
Construction apprentice support contribution	£147,900

Construction apprentice default contribution	£609,000
Other	
Phasing and decant plan	-
St Pancras liaison group, safety group and neighbour management plan	-
Detailed basement construction plan	-
Public Realm Plan	-
Keep clear agreement (to maintain continuous public access to all areas of external public realm)	-

[Link to assessment content table.](#)

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34 LEGAL COMMENTS

34.1 Members are referred to the note from the Legal Division at the start of the Agenda.

35 Conditions – planning application

1	<p><i>Implementation period</i></p> <p>This development must be begun not later than five years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended) and to ensure adequate time for necessary mitigation to be carried out in the form of the relocation of services within the development site and from adjacent inpatient accommodation blocks can be carried out in a carefully planned manner in accordance with policies G1, C1, and A1 of the London Borough of Camden Local Plan 2017</p>
2	<p><i>Approved plans</i></p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>Existing plans: Prefix (ORL-PPA-XX-XX-DR-A-): 20100 rev P5, 20101 rev P4, 20102 rev P4, 20103 rev P4, 20104 rev P4, 20105 rev P4, 20106 rev P3, 20107 rev P3, 20108 rev P3, 20109 rev P3, 20110 rev P4;</p> <p>Demolition plans: Prefix (ORL-PPA-XX-XX-DR-A-): 20120 rev P4, 20121 rev P4, 20122 rev P4, 20123 rev P3, 20124 rev P3, 20125 rev P3, 20126 rev P5, 20127 rev P4, 20128 rev P4, 20129 rev P3;</p> <p>Proposed plans: Prefix: (ORL-PPA-XX-): XX-DR-A-20240 rev P6, LG-DR-A-20241 rev P7, GF-DR-A-20242 rev P6, 01-DR-A-20243 rev P6, 02-DR-A-20244 rev P4, 03-DR-A-20245 rev P4, 04-DR-A-20246 rev P4, 05-DR-A-20247 rev P4, 06-DR-A-20248 rev P4, 07-DR-A-20249 rev P4, 08-DR-A-20250 rev P4, 09-DR-A-20251 rev P4, 10-</p>

DR-A-20252 rev P4, RF-DR-A-20253 rev P3;

Use Plans: Prefix: (ORL-PPA-XX-LG-DR-A-): 20260 rev P4, 20261 rev P3, 20262 rev P3, 20263 rev P2, 20264 rev P2, 20265 rev P2, 20266 rev P2, 20267 rev P2, 20268 rev P2, 20269 rev P2;

Proposed sections: Prefix: (ORL-PPA-XX-XX-DR-A-): 20300 rev P5, 20301 rev P5, 20302 rev P5, 20303 rev P5, 20304 rev P5, 20305 rev P5;

Proposed elevations, treatment and materials: Prefix: (ORL-PPA-XX-XX-DR-A-): 20400 rev P5, 20401 rev P6, 20402 rev P5, 20403 rev P5, 20404 rev P6, 20405 rev P5, 20700 rev P5, 20701 rev P4, 20702 rev P4, 20703 rev P1; ORL-WHA-ZZ-GF-DR-L-110010

Supporting documents: Air Quality Assessment ORL-INF-XX-XX-RP- PL- 120 dated October 2020; Arboricultural Impact Assessment ORL-INF-XX-XX-RP- PL-130 dated October 2020; Archaeological Desk Based Assessment ORL-INF-XX-XX-RP- PL-140 dated October 2020; Bat Survey ORL-INF-XX-XX-RP- PL-150-2019 dated October 2020; Basement Impact Assessment ORL-INF-XX-XX-RP-PL-330 Revision 5.0 dated May 2021; Desktop Ground Movement Assessment rev.2.0 dated May 2021; Basement Impact Assessment Proforma ORL-INF-XX-XX-RP- PL-335 dated October 2020; Biodiversity Net Gain Assessment ORL-INF-XX-XX-RP- PL-160- Metric 2.0 dated October 2020; Circular Economy Statement ORL-INF-XX-XX-RP- PL- 180 dated October 2020; Covering Letter ORL-INF-XX-XX-RP- PL-010 dated 16th October 2020; Daylight, Sunlight and Overshadowing Report ORL-INF-XX-XX-RP-PL-190 Revision 1.0 dated February 2021; Delivery and Servicing Plan ORL-INF-XX-XX-RP- PL-200 dated October 2020; Design and Access Statement ORL-INF-XX-XX-RP- PL- 100 Rev P04 dated 15.10.20; Designing Out Crime Statement ORL-INF-XX-XX-RP- PL- 105 dated November 2020; Energy Strategy ORL-INF-XX-XX-RP- PL- 220 dated October 2020; External Lighting Assessment ORL-INF-XX-XX-RP- PL-280 dated October 2020; Fire Safety Statement ORL-INF-XX-XX-RP- PL- 230 dated October 2020; Flood Risk Assessment and Drainage Strategy ORL-INF-XX-XX-RP- PL- 240 dated May 2021 rev 1.0; Illustrative Parameters Plan for remaining site (1906_P_0001, 1906_P_0002, 1906_P_0003 Rev A); Landscape Design Report ORL-INF-XX-XX-RP- PL- 270 dated October 2020; Noise and Vibration Assessment ORL-INF-XX-XX-RP- PL-290 dated October 2020; Operational Recycling and Waste Management Plan ORL-INF-XX-XX-RP- PL- 370 dated October 2020; Outline Construction Management Plan ORL-INF-XX-XX-RP- PL-170 dated May 2021 rev 1.0; Phase 1 Geotechnical and Geoenvironmental Desk Study Report ORL-INF-XX-XX-RP- PL- 260 dated October 2020; Planning Statement ORL-INF-XX-XX-RP- PL-110 dated October 2020; Preliminary Ecological Appraisal Report ORL-INF-XX-XX-RP- PL-320 dated October 2020; Social, Economic and Health Impact Report ORL-INF-XX-XX-RP- PL-210 dated October 2020; Statement of Community Involvement ORL-INF-XX-XX-RP- PL-310 dated October 2020; St Pancras Hospital Operational Strategy (Camden & Islington NHS Foundation Trust supporting letter); Sustainability Statement ORL-INF-XX-XX-RP- PL- 340 dated October 2020; Townscape, Heritage and Visual Impact Assessment ORL-INF-XX-XX-RP- PL- 250 dated November 2020; Transport Assessment ORL-INF-XX-XX-RP- PL- 350 dated October 2020; Travel Plan ORL-INF-XX-XX-RP- PL- 360 dated October 2020; Tree Survey Report ORL-INF-XX-

	<p>XX-RP- PL-135 dated October 2020; Wind Microclimate Assessment ORL-INF-XX-XX-RP- PL dated October 2020; Whole life carbon assessment Report dated March 2021; Updated areas schedule 210312 Rev J. Post submission technical queries and notes: Air Quality Responses via Email at 13:04 on 09/02/2021; Archaeology Reponses via Email at 16:06 on 09/02/2021; Biodiversity technical note dated February 2021; City Road Floorspace via Email at 16:09 on 07/12/2020; Energy and sustainability technical note dated March 2021; Flood Risk Assessment and Drainage Strategy technical note #1 dated February 2021; Green Line Route A1_1 Figure: 60588325-GL-001_Rev A dated 13/04/2021; Green Line Route A1_2 Figure: 60588325-GL-001_Rev A dated 13/04/2021; Proposed Highway to be Stopped Up (Ref: 60588325-SU-001); 29.04.21 Response Note to TfL; Design and Access Statement Addendum ORL-INF-XX-XX-RP-PL-100-AD Rev P01 dated 30.04.21; CMS Summary of the Collaboration Agreement between C&I, KC (SPH) Limited Partnership and Moorfields Eye Hospital NHS Foundation Trust – ‘Letter to Guy Bransby – 20.04.2021; Oriel – Building Decant Possession Strategy 210505; Landscape Design (Arboriculture) technical note dated March 2021; Thames Water Comments – TW reference 2020/4825/P via Email at 17:14 on 23/02/2021; Thames Water Comments via Email at 15:08 on 09/02/2021; Thames Water letter DS6081542_Pre Dev Capacity letter_red dated 26 February 2021; Townscape, Heritage and Visual Impact Assessment Addendum dated February 2021; Transport Last Half Mile – Green Line Proposals 0046801-3608 Revision P01 dated 1 March 2021; Transport note TN001: Responses to LB Camden Comments dated 5 February 2021; Transport note TN002: Response to LB Camden Comments – Mode Share dated 18 Feb 2021; Transport note TN003: Patient Travel Behaviour dated February 2021; Transport note TN004: Travel Behaviour Survey Results dated 22 March 2021; Transport Technical Queries on Cycle Provision dated March 2021; Transport: Outline Construction Management Plan ORL-INF-XX-XX-RP-PL-170 Revision 1.0 dated March 2021.</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p><i>Composite use</i></p> <p>The proportion and quantum of health care, research and education areas within the composite use shall, as a minimum, remain in accordance with the areas schedule hereby approved (ref. areas schedule 210312 Rev J.).</p> <p>Reason: To ensure that the strategic public benefits of the scheme are delivered and that the building does not adversely affect the adjoining premises/occupiers/immediate area by reason of an intensification via the use of a higher proportion of internal areas for activities (such as commercial) that generate higher trips numbers and employment density and therefore cause excessive pressure on the local open spaces, transport network and cycle parking provision in accordance with policies G1, C1, CC1, D1, A1, A2, TC1, T1, T3 and DM1 of the London Borough of Camden Local Plan 2017</p>
	<p>Design and conservation</p>
4	<p><i>Detailed drawings/samples</i></p> <p>Prior to commencement of the relevant part of works, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:</p>

	<p>Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:</p> <ul style="list-style-type: none"> a) Typical details including sections at 1:10 of all windows (including jambs, head and cill), ventilation grills and external doors types and soffit/undercroft detailing; b) Typical details including sections at 1:10 of cornice line details, to include reveals; c) Plan, elevation and section drawings, of all ground floor facades at a scale of 1:10, to include details of areas reserved for external wayfinding and building signage; d) Typical plan, elevation and section drawings of balustrading to terraces and balconies; e) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and sample panels at a minimum of 1mx1m of those materials (to be provided on site). f) A typical sample elevation panel (minimum 2m x 2m in size) including section of glazed opening, terracotta panel and fins, showing reveal and header detail and showing the colour and texture of facing materials (to be provided on site) g) Typical details of external louvres h) Details of all bollards and ram barriers (including moveable ones and their means of control /management), gates, fences or other means of enclosure which form part of the public realm. i) Details of the roller shutter to the deliveries and servicing bay entrance j) Details of vision glass where proposed to the exterior façade at ground and lower ground floor levels k) Typical plan, elevation and section drawings of terracotta panels; <p>The sample panels require above should be erected on-site and approved by the Council before the relevant parts of the work are commenced. The relevant part of the works shall then be carried in accordance with the approved details</p> <p>Reason: To safeguard the the character and appearance of the proposed building and wider area in accordance with the requirements of Policies D1, D2 and D3 of the Camden Local Plan 2017.</p>
5	<p><i>Accessibility</i></p> <p>The development hereby approved shall achieve high standards of accessible and inclusive design in accordance with the details outlined within the hereby approved Design and Access Statement, taking into account the requirements of Part M of the Building Regulations. The principles for designing the scheme for people living with visual impairment / eye diseases and inclusive design principles shall be carried through to the detailed design stage for the building and the public realm, and retained</p>

	<p>in perpetuity.</p> <p>Reason: To promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities in accordance with the requirements of policy C6 of the London Borough of Camden Local Plan 2017.</p>
	<p><i>External lighting strategy</i></p> <p>Prior to first use of the new facility, a lighting strategy for all areas of external artificial lighting shall be submitted to and approved in writing by the local planning authority. Lighting contours shall be submitted to demonstrate that the vertical illumination of neighbouring premises is in accordance with the recommendations of the Institution of Lighting Professionals in the 'Guidance Notes for the Reduction of Obtrusive Light'. Details should also be submitted for approval of measures to minimise use of lighting and prevent glare and sky glow by correctly using, locating, aiming and shielding luminaires. Such strategy shall be developed with input from a specialist lighting engineer accredited by the Institute of Lighting Engineers and shall incorporate (inter alia) consideration of the impact of the lighting design on the needs of wildlife (including bats), contributing to reducing crime, residential properties, maintainability, whole life cost and energy use and impact on the adjacent Sites of Important Nature Conservation</p> <p>The development shall not be carried out otherwise than in accordance with the details thus approved and shall be fully implemented before the premises are first occupied.</p> <p>Reason: To maintain a high quality of amenity and a safe environment and to minimise disruption to adjoining occupiers and for nature conservation, in accordance with Policies D1, D2, A1 and A3 of the Camden Local Plan 2017</p>
6	<p><i>Refuse and recycling areas</i></p> <p>Prior to first use of the facility, the refuse and recycling storage areas and facilities shown on plans hereby approved shall be completed and made available. The development shall not be implemented other than in accordance with such measures as approved. All such measures shall be in place prior to the first use of the building and shall be retained thereafter.</p> <p>Reason: To safeguard the amenities of the future occupiers and adjoining neighbours in accordance with the requirements of policies A1, T1 and CC5 of the Camden Local Plan.</p>
7	<p><i>Archaeology</i></p> <p>Prior to the commencement of development (other than site preparation or investigation works) a stage 1 written scheme of investigation (WSI) shall be submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works. If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:</p>

	<p>A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</p> <p>B. Where appropriate, details of a programme for delivering related positive public benefits.</p> <p>C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.</p> <p>Reason: to safeguard the archaeological and historical interest on this site in accordance with policy D2 of the Camden Local Plan</p>
8	<p><i>GLAAS – Historical building records</i></p> <p>No demolition (other than site preparation or investigation works) shall take place until a written scheme of historic building investigation (HBI) has been submitted to and approved by the local planning authority in writing. For buildings that are included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and</p> <p>A. The programme and methodology of historic building investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</p> <p>B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI</p> <p>Reason: to safeguard the archaeological and historical interest on this site in accordance with policy D2 of the Camden Local Plan</p>
9	<p><i>Fire statement</i></p> <p>No above ground construction shall commence until a Fire Statement has been submitted to and approved in writing by the Local Planning Authority. The Fire Statement shall be produced by an independent third party suitably qualified assessor which shall detail the building's construction, methods, products and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring and how provision will be made within the site to enable fire appliances to gain access to the building. The relevant Phase of the development shall be carried out in accordance with the approved details.</p> <p>Reason: In order to provide a safe and secure development in accordance with policy CP3 of the Core Strategy and policy D11 of the Draft London Plan.</p>
10	<p><i>Basement construction oversight</i></p> <p>None of the basement excavation works hereby approved shall commence until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, approve and monitor the critical elements of both permanent and temporary basement construction works throughout</p>

	<p>their duration to ensure compliance with the design which has been checked and approved by a building control body. Details of the appointment and the appointee's responsibilities shall be submitted to and approved in writing by the local planning authority prior to the commencement of development. Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.</p> <p>Reason: To safeguard the appearance and structural stability of neighbouring buildings, local water environment and the character of the immediate area in accordance with the requirements of policies D1, D2 and A5 of the London Borough of Camden Local Plan 2017</p>
	<p>Landscaping, trees and nature conservation</p>
11	<p><i>Landscape</i></p> <p>Full details of hard and soft landscaping shall be submitted to and approved in writing by the local planning authority before the relevant part of the development commences.</p> <p>The submission to include details of:</p> <ul style="list-style-type: none"> a) full details of all public realm, terraces and routes b) locations of external CCTV and security monitors/fixtures c) public realm planters including sections, materials and finishes and planting schedules d) final location details of all trees, with accompanying evidence that all locations have been investigated to ensure planting is viable and takes sufficient account of the proximity of local highway and underground infrastructure; e) permanent works, including samples of ground surface materials, to all areas of public open space including details of materials and finishes f) details of the planting species and soil type g) a maintenance plan h) irrigation i) rain water harvesting to serve the roof garden j) sectional drawings of all planting areas <p>The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.</p> <p>Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area, the safety of patients and visitors as well as securing bio-diversity net gains in accordance with the requirements of policies A2, A3, A5, D1 and D2 of the London Borough of Camden Local Plan 2017</p>
12	<p><i>Landscape timing and replacements</i></p> <p>All hard and soft landscaping works shall be carried out in accordance with the approved landscape details by not later than the end of the planting season following completion of the development or any phase of the development or prior to the first use of the development, whichever is the sooner. Any trees or areas of planting (including trees existing at the outset of the development other than those indicated to be removed) which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as</p>

	<p>soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.</p> <p>Reason: To ensure that the landscaping is carried out within a reasonable period and contributes to the visual amenity and character of the area, the safety of patients and visitors as well as securing bio-diversity net gains in accordance with the requirements of policies A2, A3, A5, D1 and D2 of the London Borough of Camden Local Plan 2017</p>
13	<p><i>Tree replanting</i></p> <p>Before the relevant part of the development commences full details of the tree planting shall be submitted to and approved in writing by the local planning authority.</p> <p>Such details shall include:</p> <ul style="list-style-type: none"> - a schedule detailing species, sizes and locations of trees (and tree pits where applicable), taking into account the standards set out in BS8545:2014 - details of any proposed earthworks including grading, mounding and other changes in ground levels. - a tree management plan including a scheme of maintenance and details of irrigation methods and measures <p>Any trees which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the Council gives written consent to any variation.</p> <p>The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.</p> <p>Reason: To enable the Council to ensure a reasonable standard of amenity in the scheme in accordance with the requirements of Policies D1, A1, A2 and A3 of the Camden Local Plan 2017.</p>
14	<p><i>Living <u>roof</u> details and installation</i></p> <p>Full details in respect of the <u>green/brown roofs</u> in the area indicated on the approved roof plans shall be submitted to and approved by the local planning authority before the relevant part of the development commences. The details shall include species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long term viability of the green/brown roof, and a programme for a scheme of maintenance shall be submitted to and approved in writing by the local planning authority. Areas of green/brown roof shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme of maintenance.</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies A3, CC1, CC2 and CC3 of the Camden Local Plan.</p>
15	<p><i>Biodiversity enhancement plan</i></p>

	<p>A) Prior to commencement of demolition works (other than site preparation and investigation), an ecological enhancement plan shall be submitted to and approved in writing by the local planning authority. Details shall include a methods statement for the demolition of buildings and removal of vegetation that have are potentially suitable as bird or bat habitat;</p> <p>B) Prior to commencement of above ground construction, further details shall be submitted to include specification and locations of the biodiversity enhancements on the proposed buildings (including bird and bat boxes) appropriate to the development's location, scale and design.</p> <p>The works shall be implemented in accordance with the approved plan and measures shall be installed prior to the occupation of the development and thereafter retained.</p> <p>Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of policies D1 and A3 of the Camden Local Plan.</p>
	<p>Residential amenity / enviro health</p>
<p>16</p>	<p><i>Roof terraces</i></p> <p>Other than the rooftop terrace provided to the roof of the lower wing in the south west of the development (as shown on drawing no.ORL-PPA-XX-06-DR-A-20248 Rev P4 hereby approved), all areas of flat roofs within the development shall not be used as terraces without the prior express approval in writing of the Local Planning Authority.</p> <p>Reason: To safeguard the amenities of adjoining and future neighbours in accordance with the requirements of policy A1 and D1 of the Camden Local Plan.</p>
<p>17</p>	<p><i>Land Contamination</i></p> <p>Prior to the commencement of the works other than site preparation and investigation, a scheme including the following components to address the risk associated with site contamination shall be submitted to and approved in writing by the local planning authority:</p> <p>a. The results of the site investigations and, based on these, if remediation measures are identified necessary, a remediation strategy giving full details of the remediation measures required and how they are to be undertaken;</p> <p>b. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy are complete and identifying any requirements for the longer monitoring of pollution linkages, maintenance and arrangements for contingency action.</p> <p>Any investigation must be undertaken in accordance with the requirements of the Environment Agency's Model Procedures for the Management of Contamination (CLR11 / now LCRM). If additional significant contamination is found at any time when carrying out the approved development, it must be reported in writing immediately to the LPA. For the avoidance of doubt, this condition can be discharged on a section by section basis.</p> <p>Reason: To ensure the risks from land contamination to the future users of the land</p>

	<p>and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.</p>
18	<p><i>Land contamination - Gas and vapour post development:</i></p> <p>Prior to first use of the basement areas an appropriate radon gas and vapour investigation (incorporating the results of environmental and historical searches and detailed assessment of the risks to all receptors that may be affected) is undertaken and a ground gas and vapour assessment report (GVAR) [where necessary incorporating a Remediation Strategy (RS)], is submitted to, and approved in writing by, the local planning authority.</p> <p>The condition will not be discharged until the approved RS is implemented and a Verification Report (VR) is submitted to, and approved in writing by, the local planning authority. Where remedial measures are implemented to protect end-users of the development they shall be retained in perpetuity.</p> <p>Reason: To ensure the risks to the future users of the site can be carried out safely without unacceptable risks in accordance with policies G1, D1, A1, CC4 and DM1 of the London Borough of Camden Local Plan 2017.</p>
19	<p><i>Plant noise emissions</i></p> <p>The external noise level emitted from plant, machinery or equipment at the development hereby approved shall be lower than the typical background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity.</p> <p>Reason: To safeguard the amenities of neighbouring noise sensitive receptors in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
20	<p><i>Plant vibration</i></p> <p>Plant or equipment and ducting at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017</p>
21	<p><i>Emergency Plant</i></p> <p>Noise emitted from the emergency plant and generators hereby permitted shall not increase the minimum assessed background noise level (expressed as the lowest 24 hour LA90, 15 mins) by more than 10dB one metre outside any premises. The emergency plant and generators hereby permitted may be operated only for essential testing, except when required by an emergency loss of power. Testing of emergency</p>

	<p>plant and generators hereby permitted may be carried out only for up to one hour in a calendar month, and only during the hours 09.00 to 17.00 hrs Monday to Friday and not at all on public holidays.</p> <p>Reason: To ensure that the amenity of occupiers of the surrounding premises are not adversely affected by noise from mechanical installations/ equipment, in accordance with Policies A1 and A4 of the Camden Local Plan 2017.</p>
	<p>Water, sustainability, AQA</p>
22	<p><i>SuDS</i></p> <p>Prior to any above ground construction, full details of the sustainable urban drainage system and permeable paving shall be submitted to and approved in writing by the local planning authority. Such system shall be based on the details set out within the Flood Risk and Drainage assessment hereby approved. Details shall include a maintenance plan. The system shall be implemented as part of the development and thereafter retained and maintained.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with Policies CC1, CC2, CC3 of the London Borough of Camden Local Plan 2017.</p>
23	<p><i>Thames water - Waste water:</i></p> <p>The development shall not be occupied until confirmation (including from Thames Water) has been provided that either: Capacity exists off site to serve the development; or all wastewater network upgrades required to accommodate the additional flows from the development have been completed; or, a housing and infrastructure phasing plan has been agreed with Thames Water to allow the use of the building to commence. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed infrastructure phasing plan.</p> <p>Reason: The development may lead to sewage flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents, in accordance with the requirements of policies A5 and CC3 of the Camden Local Plan 2017</p>
24	<p><i>Thames Water - Water infrastructure</i></p> <p>The development shall not be occupied until confirmation has been provided that either: all surface water network upgrades required to accommodate the additional flows from the development have been completed; or, a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.</p> <p>Reason: The development may lead to network capacity issues and reinforcement works may be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any necessary</p>

	<p>reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents, in accordance with the requirements of policies A5 and CC3 of the Camden Local Plan 2017.</p>
25	<p><i>Thames Water – piling methods statement</i></p> <p>Prior to commencement of any impact piling, a piling method statement shall be submitted to and approved in writing by the local planning authority. The Method Statement shall be prepared in consultation with Thames Water or the relevant statutory undertaker, and shall detail the depth and type of piling to be undertaken and the methodology by which such piling will be carried out including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works. Any piling must be undertaken in accordance with the terms of the approved piling method statement.</p> <p>Reason: To safeguard existing below ground public utility infrastructure and controlled waters in accordance with the requirements of Policy CC3 of the London Borough of Camden Local Plan 2017</p>
26	<p><i>Air quality - Mechanical Ventilation</i></p> <p>Prior to commencement of above-ground development, full details of the mechanical ventilation system including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads and the generator exhaust stack, catering exhausts or any other emission sources and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.</p> <p>Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1.</p>
27	<p><i>Air quality - Back up generators</i></p> <p>Prior to commencement of above ground works consideration of alternative technology options for back up generation should be considered and details of any proposed Emergency Diesel/oil Generator Plant and associated abatement technologies including make, model and emission details shall have been submitted to and approved by the Local Planning Authority in writing. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications and details of emission certificates by an accredited MCERTS organisation shall be provided following installation and thereafter on an annual basis to verify compliance with regulations made by the Secretary of State.</p> <p>Reason: To safeguard the amenity of occupants, adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan Policies.</p>
28	<p><i>Air quality - Construction related impacts – Monitoring</i></p> <p>No development, other than site preparation, clearance and investigation works shall take place until air quality monitoring has been implemented on-site, and until the submission of the following:</p> <ol style="list-style-type: none"> a. air quality monitors have been installed;

	<p>b. prior to installing monitors, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they have been installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;</p> <p>c. evidence has been submitted demonstrating that the monitors have been in place for at least 3 months prior to the proposed implementation date.</p> <p>The monitors shall be retained and maintained on site for the duration of the development in accordance with the details thus approved.</p> <p>Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan Policies</p>
29	<p><i>Air quality - Non-road mobile machinery</i></p> <p>All non-Road mobile Machinery (any mobile machine, item of transportable industrial equipment, or vehicle – with or without bodywork) of net power between 37kW and 560kW used on the site for the entirety of the [demolition and/construction] phase of the development hereby approved shall be required to meet Stage IIIA of EU Directive 97/68/EC. The site shall be registered on the NRMM register for the [demolition and/construction] phase of the development.</p> <p>Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements policies A1 and CC4 of the Camden Local Plan.</p>
30	<p><i>Energy – PV cells</i></p> <p>Prior to first occupation of the buildings, detailed plans showing the location and extent of photovoltaic cells to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of Policy G1, CC1 and CC2 of the London Borough of Camden Local Plan 2017</p>
	<p>Transport</p>
31	<p><i>Cycle parking</i></p> <p>Prior to first use of the development commences, details of secure and covered cycle storage, changing, shower and locker area for cycles shall be submitted to and approved by the local planning authority. The approved facilities shall thereafter be provided in its entirety prior to the first use of the building, and permanently retained thereafter.</p> <p>Reason: To ensure the development provides adequate cycle parking facilities in</p>

	accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.
32	<p><i>Onsite servicing</i></p> <p>No loading or unloading of goods, (other than deliveries of oil/diesel) including fuel, by vehicles arriving at or departing from the premises shall be carried out otherwise than within the curtilage of the building.</p> <p>Reason: To avoid obstruction of the surrounding streets and to safeguard amenities of adjacent premises in accordance with the requirements of policies A1 and T4 of the London Borough of Camden Local Plan 2017.</p>
33	<p><i>Blue badge parking</i></p> <p>The development shall not be occupied until the blue badge car parking provision shown on the approved drawings is provided. Thereafter the whole of the car parking provision shall be retained and used for no purpose other than for the parking of vehicles of the occupiers and users of the development.</p> <p>Reason: To ensure that the use of the premises does not add to parking pressures in surrounding streets which would be contrary to policy T2 of the London Borough of Camden Local Plan 2017.</p>

36 Informatives – planning application

1	<p><i>Construction management</i></p> <p>You are advised the developer and appointed / potential contractors should take the Council's guidance on Construction Management Plans (CMP) into consideration prior to finalising work programmes and must submit the plan using the Council's CMP pro-forma; this is available on the Council's website at https://beta.camden.gov.uk/web/guest/construction-management-plans or contact the Council's Planning Obligations Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444). No development works can start on site until the CMP obligation has been discharged by the Council and failure to supply the relevant information may mean the council cannot accept the submission as valid, causing delays to scheme implementation. Sufficient time should be afforded in work plans to allow for public liaison, revisions of CMPs and approval by the Council.</p>
2	<p><i>CIL</i></p> <p>This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice. Camden adopted new CIL rates in October 2020 which can be viewed at the above link.</p>
3	<p><i>Archaeological WSI</i></p>

	<p>Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015</p> <p><i>Building Record</i></p> <p>The written scheme of investigation will need to include a level 4 archaeological recording of the existing site and its buildings and to be prepared and implemented by a suitably professionally accredited heritage practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. Guidance for historic building recording best practice on our website. https://historicengland.org.uk/images-books/publications/understanding-historic-buildings/heaq099-understanding-historic-buildings/</p>
4	<p><i>Thames Water - Waste water assets:</i></p> <p>"The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB. The developer can also request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning.</p>
5	<p><i>Thames Water – water assets:</i></p> <p>The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk</p>
6	<p><i>Thames Water - Trade effluent consent</i></p> <p>A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment,</p>

	<p>separate metering, sampling access etc may be required before the Company can give its consent. Applications should be made at https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Trade-effluent</p> <p>or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.</p>
7	<p><i>Thames Water - Grease separates</i></p> <p>As per Building regulations part H paragraph 2.21, Drainage serving kitchens in commercial hot food premises should be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825-2:2002 or other effective means of grease removal. Thames Water further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Please refer to our website for further information: www.thameswater.co.uk/help</p>
8	<p><i>Construction related air quality impacts</i></p> <p>Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.</p>
9	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at www.camden.gov.uk) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
10	<p>This permission is granted without prejudice to the necessity of obtaining consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Application forms may be obtained from the Council's website, www.camden.gov.uk/planning or the Camden Contact Centre on Tel: 020 7974 4444 or email env.devcon@camden.gov.uk.</p>
11	<p>Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.</p>
12	<p>You are advised that the biodiversity information/ecological assessment provided as part of this application will be made available to Greenspace Information for Greater</p>

	<p>London [GIGL], the capital's environmental records centre. This will assist in a key principle of PPS9 (Biodiversity and Geological Conservation) by building up the data base of up-to-date ecological information and this will help in future decision making.</p>
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