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Camden Council
Planning - Development Control
Camden Council
Camden Town Hall
London
WC1H 8ND

13 October 2022

F.A.O. Jennifer Walsh

Dear Sir/Madam,

**ST. PANCRAS HOSPITAL, 4 ST PANCRAS WAY, LONDON, NW1 0PE
TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**

APPLICATIONS FOR PLANNING PERMISSION FOR RELEVANT DEMOLITION IN A CONSERVATION AREA

On behalf of our client, Bouygues UK ("the Applicant"), please find enclosed an application ("the / this Application") for planning permission for relevant demolition in a conservation area (Ref: PP-11584654) in relation to 'Project Oriel' at St Pancras Hospital, 4 St Pancras Way, London, NW1 0PE ("the Site / the Building") for ("the Proposals / Proposed Works"):

"Partial demolition of western perimeter wall on St Pancras Way to facilitate the installation of two temporary sub-stations; and temporary installation of Durasteel to infill west and south facing fenestration at ground floor level of the existing gatehouse building"

THE SITE

The Site is located within the administrative authority of the London Borough of Camden ("LB Camden").

The Site forms part of the wider St Pancras Hospital Site and lies on the eastern site of St Pancras Way. The Site is bound by access roads to the north and east, and car parking to the south which all form part of the hospital site.

The Site comprises a three-storey building (referred to as "the Gatehouse building"), areas of hardstanding and part of the existing perimeter wall on St Pancras Way.

The Site lies within the Kings Cross / St Pancras Conservation Area.

BACKGROUND

On 5 August 2022, planning permission was granted (ref. 2020/4825/P) for the partial redevelopment of the St. Pancras Hospital site, also known as 'Project Oriel'. The proposals included demolition of seven existing buildings across the site, and the 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.

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Montagu Evans LLP is a limited liability partnership registered in England and Wales with registered number OC312072. Registered office 70 St Mary Axe, London EC3A 8BE. A list of members' names is available at the above address.

As part of the enabling works for the new Moorfields Eye Hospital, the existing substation is required to be relocated so to facilitate construction activity/works on the site. Following consultation with key stakeholders, including UKPN, it has been identified through an extensive options study (submitted as part of this Application) that the most suitable location for the substations is between the existing Gatehouse building and the existing western perimeter wall on St. Pancras Way, with the parts of the existing boundary wall temporarily dismantled so to enable 24/7 unrestricted UKPN access to the substation along St. Pancras Road.

Furthermore, Durasteel panels are proposed to be installed on a temporary basis to infill west and south facing fenestration at ground floor level of the existing Gatehouse building, so to protect the interior of the building and windows from the unlikely event of fire/ damage.

It is understood that the King's Cross Central Limited Partnership ('KCCLP'), the development partner of the landowners – the Camden and Islington Trust, are in the process of bringing forward redevelopment proposals for the Gatehouse and southern / eastern areas of the St. Pancras Hospital site (currently understood to be at pre-application stage with engagement from Officers at the Council). The location of the substations and temporary installation of the Durasteel have also been informed by these forthcoming proposals.

A pre-application meeting took place on 10 August 2022, with LB Camden, to discuss the proposals for the temporary location of the sub-stations. LB Camden provided pre-application advice on 25 August 2022 on the scope of this Application. This Application has been prepared in accordance with the advice given.

PROPOSED DEVELOPMENT

This Application seeks planning permission for relevant demolition in a conservation area for the:

- partial demolition of the western perimeter wall on St Pancras Way to facilitate the installation of two temporary sub-stations; and
- temporary installation of Durasteel to infill west and south facing fenestration at ground floor level of the existing gatehouse building.

The sub-station enclosures would be clad in mid-brown (08-B-25) to match the existing perimeter wall. The Durasteel specification is provided as part of this Application.

Once the sub-stations are operational, the doors would need to be opened onto the pavement for routine maintenance. The opening of the doors would be limited to once every 12 months, or in the event of emergencies, in order to minimise any disruption to the highway. The existing pavement depth is 1966mm, when the doors of the sub-station are open this would be reduced to 1267mm, however, this reduced depth will not impact significantly on pedestrian flows.

The relocation of the substations and the introduction of Durasteel panels to the Gatehouse are a temporary measure during the construction stage of the Moorfields Eye Hospital, with the substations to be removed in 2025/2026.

Long-term it is envisaged that the KCCLP development will seek permanent removal of the perimeter wall in this location (see Illustrative Parameter Plan 1 ref. 1906_P_001 contained within Appendix 1). However, in the event that the KCCLP development does not come forward or no longer seeks to remove the wall, once the construction of Moorfields Eye Hospital is complete the perimeter wall subject to this application will be reinstated.

Great care will be taken in the removal of bricks from both locations identified, so to ensure brickwork can be set aside. Following the removal of the substations, the sections of perimeter wall to be demolished as part of these proposals will be re-built using the existing set aside brick work.

Furthermore, the client/contractor for the Moorfields Eye Hospital works will undertake a brick salvaging exercise during demolition/ construction works to the northern wall in association with the Moorfields Eye Hospital redevelopment,



identifying where bricks match those removed at the substation site, so only the best, most intact bricks are reused following the substations removal in 2025/ 2026.

Full details of the proposed works are provided on the Application Drawings submitted as part of this Application.

PLANNING POLICY

National Guidance

Statutory Framework

Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise and Section 16 (2) of the Planning (Listed Building and Conservation Areas) Act 1990.

The Development Plan

The statutory development plan for the Site comprises:

- The London Plan (2021);
- Camden Local Plan (July 2017); including
 - Camden Policies Map (August 2021).

The Site is subject the following designations under the LB Camden (2021), within the:

- Site Allocation Site 6: 4 St Pancras Way (St Pancras Hospital) for mixed-use development; and
- Kings Cross / St Pancras Conservation Area.

Planning (Listed Buildings and Conservation Areas) Act 1990

The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory provisions for conservation areas at Section 72(1).

Section 72 (1) states:

In the exercise, with respect to any buildings or other land in a conservation area, of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

PLANNING POLICY ASSESSMENT

Principle of Development

With regard to the proposal, consideration should be given to the wider redevelopment of the Moorfields Eye Hospital (ref. 2020/4825/P) and the temporary nature of the proposed works for which permission is sought.

The proposal is a temporary measure only, to facilitate the construction stage of the Moorfields Eye Hospital (as approved under planning permission ref. 2020/4825/P) and bring about the public-health benefits associated with the provision of a new medical and research facility of international importance.



The substations are proposed to be removed from the Site in 2025/2026, with the Durasteel panels also proposed to be removed. The existing situation will be re-instated following the removal of the sub-stations, using the existing brickwork where possible, as detailed above.

With regard to the above, the Application should be supported in principle.

Design and Heritage

Camden Local Plan Policy D1 states that the Council will seek to secure high quality design in development. The Council will require that development respects local context and character, preserves or enhances the historic environment and heritage assets, amongst other criteria.

The proposed sub-stations would be clad in mid-brown (08-B-25) to match the existing perimeter wall.

Camden Local Plan Policy D2 (Heritage) states that the Council will preserve and, where possible, enhance the borough's rich and diverse heritage assets and their settings, including conservation areas. The Council will not permit the loss of or substantial harm to a designated heritage asset, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Furthermore, the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset, unless the public benefits of the proposal convincingly outweigh that harm.

In specific relation to conservation areas, Camden Local Plan Policy D2 (Heritage) states that the Council will take account of conservation area statements, and management strategies when assessing applications which fall within a conservation area. In doing so, the Council will require development to preserve, or where possible, enhance the character and appearance of a conservation area.

A Heritage Statement has been prepared by Montagu Evans which is submitted as part of this Application which provides an assessment of the proposed development.

The assessment concludes that owing to the height of the existing wall / proposed substations, visibility of the Durasteel from the street of St. Pancras Way will be extremely limited. It is considered that when taken in the round, the limited harm caused by the removal of brickwork to the boundary wall and the temporary installation of Durasteel to southern and western ground floor windows of the existing Gatehouse, will be outweighed by the improvements to the setting of the identified heritage assets following the construction of Moorfields Eye Hospital. The proposed works are required to facilitate the construction of the new medical and research building, which is considered to be of major importance both nationally and internationally in relation to medical research, development and treatment.

Furthermore, the significance of the identified heritage assets will be fully restored following the completion of Project Oriel in circa. 2025/2026, with the reconstruction of the boundary wall and removal of Durasteel panels.

Based on the above basis, it is considered that the Proposed Development complies with Camden Local Plan Policy D1 and D2 and is acceptable in heritage terms given the significant benefits that will be delivered by the construction of the Moorfields Eye Hospital.

Highways

Camden Local Plan Policy T3 (Transport Infrastructure) states that the Council will protect existing transport infrastructure, particularly routes and facilities for walking from removal or severance.

Whilst the proposed sub-station doors would open onto the adjacent pavement, this would be limited to once every 12 months, or in the event of emergencies, in order to minimise any disruption to the highway. Moreover, it is considered that sufficient pavement depth will remain so as to not impede pedestrian flows.

It is therefore considered that the Proposed Development is acceptable from a highways perspective.



SUMMARY

In light of the above, it can be concluded that the Proposed Development for the partial demolition of the western perimeter wall on St Pancras Way to facilitate the installation of two temporary substations and temporary installation of Durasteel to infill west and south facing fenestration at ground floor level of the existing gatehouse building is considered acceptable.

The Proposals are a temporary measure which is necessary to facilitate the construction stage of the Moorfields Eye Hospital (as consented under planning permission ref. 2020/4825/P) and bring about the public-health benefits associated with the provision of a new medical building and research facility for London.

Following the removal of the substations, the sections of perimeter wall to be demolished as part of the Proposed Development will be re-instated using the existing brickwork.

We therefore respectfully request that LB Camden grant planning permission for relevant demolition in a conservation area for the proposals.

APPLICATION MATERIAL

The Application is submitted via the Planning Portal (Ref: PP-11584654) and comprises the following documentation:

1. Schedule of Application Documents prepared by Montagu Evans LLP;
2. Application Cover Letter (including Planning Statement) prepared by Montagu Evans LLP;
3. Completed Application Form (Planning Permission) (Relevant Demolition in a Conservation Area) (with Ownership Certificates) prepared by Montagu Evans LLP;
4. Site Location Plan (1:1250) prepared by IBI Group;
5. Drawing Schedule prepared by Montagu Evans LLP;
6. Application Drawings prepared by IBI Group;
7. Heritage Statement prepared by Montagu Evans LLP;
8. St Pancras Hospital and Local Network Substation – Relocation Option Analysis Report prepared by BYUK;
9. Durasteel Specification Details; and
10. Community Infrastructure Levy Form prepared by Montagu Evans LLP.

APPLICATION PROCEDURE

This Application for planning permission for relevant demolition of an unlisted building in a conservation area (ref. PP-11584654) has been submitted via the Planning Portal.

The Application fee has been calculated in accordance with the Town and Country Planning (Fees for Applications and Deemed Applications) (Amendment) (England) 2012 (as amended). The fee amounting to £234.00 (+ £32.20 service charge) will be paid via the Planning Portal upon submission. In accordance with regulations, no fee is applicable to applications for listed building consent.



We would be grateful if LB Camden could confirm that our application is complete and will be validated shortly. In the interim, please contact [REDACTED] or [REDACTED] of this office.

Yours sincerely

[REDACTED]

MONTAGU EVANS LLP

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