



70 St Mary Axe  
London  
EC3A 8BE

PD14309/GB/JC/ED/NP

email: [REDACTED]

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

25 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)**

**APPLICATION 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-11637668) 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 two sections of north-eastern perimeter wall on Granary Street to facilitate two new temporary vehicular accesses and crossovers, to enable new patient drop-off zone; and widening of the existing access point on Granary Street. Installation of three gates to temporary access points."*

#### THE SITE

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

The Site comprises the perimeter wall which forms part of the wider St Pancras Hospital Site along the western side of Granary Street. The Site is bound by Granary Street to the north and east, and the wider hospital site to the west.

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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A list of members' names is available at the above address.



As part of the enabling works for the new Moorfields Eye Hospital, the footprint of the new Hospital building (known as 'Oriol') requires the relocation and reprovision of the patient drop off area for the North Wing, as well as the widening of the existing vehicular access for material deliveries and waste collection. Following consultation and the undertaking of an options study/appraisal (please see separate report prepared by 'Bouygues UK' submitted as part of this application), it has been identified that the owing to the proximity of basement excavations associated with the construction of Moorfields Eye Hospital, no new vehicular access can be introduced on the northern side of the wider complex, or indeed elsewhere across the wider hospital site, owing to various other constraints including existing and continued uses.

It is therefore proposed to temporarily dismantle two areas of the north-eastern boundary wall to the existing site, to enable a new patient drop-off zone accessed off Granary Street. Furthermore, an existing access point to the hospital site is proposed to be widened, so to allow for larger delivery and service vehicular access. This includes the temporary dismantling of a small area of brickwork on its northern edge.

It is understood that the landowner (Camden and Islington Trust), and their developer partner, King's Cross Central Limited Partnership ('KCCLIP') are in the process of bringing forward redevelopment proposals for the remaining 3 acres of the St. Pancras Hospital site with the intention of submitting a full-planning application in the short-medium term. It is envisaged that the KCCLP development will seek permanent removal of the perimeter wall in this location. 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 and/or the North Wing has been decanted to its new premises, the perimeter wall subject to this application will be reinstated with set aside bricks being reused so to reconstruct the boundary wall, where demolished.

A pre-application meeting took place on 10 August 2022, with LB Camden, to discuss the proposals for the temporary vehicular accesses and crossovers. 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 two sections of the north-eastern perimeter wall on Granary Street to facilitate two new temporary vehicular accesses and crossovers to enable new patient drop-off zone accessed off Granary Street;
- Widening of existing access point on Granary Street to allow for larger service and delivery access; and
- Installation of three manually operated metal gates to temporary access points.

The proposals are a temporary measure during the construction stages of the Moorfields Eye Hospital. It is anticipated that construction of the temporary access points and crossovers will commence in January 2023 and will be removed/reinstated in 2027, providing the KCCLP development does not come forward in the interim.

The gates to each of the access points would be in open between 6am and midnight, 7 days a week and would be operated manually.

Tracking drawings are provided as part of this Application which set out swept path analysis for an articulated lorry and emergency ambulance traffic. Full dimensions of the temporary accesses and crossovers 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, as due to the basement excavations associated with the construction of Moorfields Eye Hospital, no vehicular access can be introduced on the northern side of the wider complex, or indeed anywhere across the wider site. An options study/appraisal has been carried out by the Applicant which has identified that the most appropriate location for the temporary crossovers is along the north-eastern boundary wall to the existing site.

As set out above, it is envisaged that the KCCLP development will seek permanent removal of the perimeter wall in this location. In the event that the KCCLP development does not come forward or no longer seeks to remove the wall, the sections of the perimeter wall which will be removed under these proposals will be reinstated with set aside bricks being reused so to reconstruct the boundary wall, where demolished.

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 materials for the temporary crossovers are detailed on application drawing ref. 7858-OS-901 Rev 0.2 (Temporary Footway Crossovers 1, 2 & 3 for Planning Application General Arrangement). Primrose yellow road markings would mark each of the entrances to ensure that these are clearly visible to vehicles and pedestrians. The proposed access gates would be of a high-quality specification.

**Commented [ED1]:** I could see an email with CGI images of the spec - but couldn't see a standalone document - I can chase this up if not on our files.

**Commented [JC2R1]:** Lets proceed without the spec for now and ensure we seek a draft copy of the conditions before the decision notice is used. Once submitted we will need to stress to Jen that we need avoid any pre-commencement conditions to enable BYUK to start on site in January. I am hoping the gates wont actually be yellow, I am not convinced that will be acceptable in the conservation area.



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.

It is acknowledged within the assessment that the proposals will result in harm to the Kings Cross St. Pancras Conservation Area and the non-designated heritage asset of the boundary wall itself through the removal of historic, late-19th century building fabric associated with the former St. Pancras Hospital/ Workhouse site. The harm is considered to be less than substantial, and clearly would be relatively low given the small amount of fabric to be removed, as well as when considered in the context of the assets as a whole. Furthermore, such harm would be temporary, with the rebuilding of the boundary wall following completion of the Moorfield Eye Hospital building (in the event that KCCLP do not come forward with proposals to remove the perimeter wall in the interim). Nevertheless, this harm stands to be weighted in the balance against the benefits of the proposals, in accordance with both paragraphs 202 and 203 of the NPPF (2021).

The assessment concludes that, when taken in the round, the limited harm caused by the removal of brickwork to the boundary wall 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 an international and nationally important new hospital and medical research building and provide continued access to the existing hospital complex.

Furthermore, it is considered that the significance of the identified heritage assets will be fully restored following the completion of new hospital site in circa. 2027, with the reconstruction of the boundary wall.

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.

Tracking drawings are provided as part of this Application which demonstrate that the proposed crossovers are wide enough to accommodate both emergency and articulated vehicles. No visibility displays will be required. Moreover, the pedestrian crossovers will be clearly marked.

The pedestrian footpath will be reinstated following the removal of the temporary crossovers in Q1 2027.

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 two sections of north-eastern perimeter wall on Granary Street to facilitate two new temporary vehicular accesses and crossovers, to enable new patient drop-off zone accessed from Granary Street; and widening of existing access point on Granary Street 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 an Internationally important new medical building and research facility. An options study/appraisal has been carried out by the Applicant which has identified that the most appropriate location for the temporary crossovers is along the north-eastern boundary wall to the existing site.

Following the removal of the temporary crossovers, the sections of perimeter wall to be demolished as part of the Proposed Development will be re-instated using the existing brickwork (in the event that KCCLP do not come forward with proposals to remove the perimeter wall in the interim). The pedestrian footpath will be reinstated following the removal of the temporary crossovers in 2027.

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. Options Study/Appraisal for Temporary Access Points and Crossovers prepared by BYUK;
9. Community Infrastructure Levy Form prepared by Montagu Evans LLP.

#### APPLICATION PROCEDURE

This Application (ref. PP-11637668) 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.



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

Yours sincerely

*Montagu Evans*

MONTAGU EVANS LLP

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