



**Our ref:** Q200150.EIA Screening.3.0.AHW  
**Email:** Aisling.webb@quod.com  
**Date:** 20<sup>th</sup> January 2023

Jennifer Walsh  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

By email

Dear Jennifer,

## **St. Pancras Hospital, 4 St. Pancras Way, London, NW1 0PE**

### **Request for an EIA Screening Opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) – Regulation 6**

Kings Cross Central Limited Partnership (KCCLP) and the Camden & Islington NHS Foundation Trust (C&I), together referred to as the 'Applicant', intend to submit a detailed planning application to redevelop the St. Pancras Hospital site, 4 St. Pancras Way, London, NW1 0PE ('Site') to deliver a mixed-use development. On behalf of the Applicant, we write to request that an Environmental Impact Assessment (EIA) Screening Opinion is adopted by the London Borough of Camden ('LB Camden') in accordance with Regulation 6(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017<sup>1</sup> (as amended<sup>2</sup>) ('EIA Regulations').

To assist LB Camden in its adoption of a Screening Opinion, we enclose figures at Annex 1 and an EIA Screening Appraisal at Annex 2 which satisfy Regulation 6(2) as follows:

- A plan sufficient to identify the Site;
- A description of the development, including the physical characteristics of the development and, where relevant, of demolition works;
- A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- A description of the aspects of the environment likely to be significantly affected by the development;

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<sup>1</sup> Her Majesty's Stationary Office (HMSO), 2017. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. May 2017.

<sup>2</sup> HMSO, 2018. The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018. November 2018.



- A description of the likely significant effects of the development on the environment resulting from the expected residues and emissions and the production of waste, where relevant; and the use of natural resources, in particular soil, land, water and biodiversity; and
- Measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

## Existing Site and Setting

The Site comprises the eastern and southern extents of St. Pancras Hospital. It covers an area of approximately 1.46 hectares (ha) and is centred at National Grid Reference TQ 29697 83631. The Site comprises thirteen buildings of various ages, internal circulation roads, 64 car parking spaces with limited amenity landscaping and occasional trees. A brick wall, approximately 2m in height, encloses most of St. Pancras Hospital with occasional sections of wrought iron fence with planting. The existing buildings on the Site vary in height, ranging from 2 - 7 storeys above ground, with a small basement present within the South Wing, and a limited area of lower ground floor present within the East and West Wing. Vehicles access the Site from the A5202 St. Pancras Way (A5202).

A Site location plan is provided in Annex 1 (Figure 1). Annex 2 provides a more detailed description of the Site and the surrounding area.

## Planning Context

The Site forms part of an allocated site for development ('Site 6 – St. Pancras Hospital') in LB Camden's Local Plan 2017<sup>3</sup> ('Local Plan') as set out in LB Camden's Site Allocations Plan (2013)<sup>4</sup>. LB Camden is currently reviewing the Site Allocations Plan. The draft Site Allocations Local Plan<sup>5</sup> includes the St. Pancras Hospital site and will be known as CSP5. Policy CSP5 proposes uses for healthcare, self-contained homes and employment uses, whilst retaining and reusing the buildings of significant heritage or townscape value.

The Site is located within an area of significant development. The remainder of the St. Pancras Hospital site to the north benefits from planning permission for a new facility for the Moorfields Eye Hospital, UCL Institute of Ophthalmology and Moorfields Eye Charity (the 'Oriol Scheme', planning ref: 2020/4825/P). Other developments in the area include the Ugly Brown Building development beyond Granary Street to the north, the 101 Camley Street development and Onyx Apartments. Gasholders London, the Tapestry Building and the Plimsoll Building are all located further to the north east.

## Description of Development

The Applicant is seeking detailed planning permission for a mixed-use development to provide up to 120 residential units and in the region of 6,000 sqm of healthcare floorspace, approximately

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<sup>3</sup> LB Camden, 2017. Camden Local Plan.

<sup>4</sup> LB Camden, 2013. Camden Site Allocations. Local Development Document.

<sup>5</sup> LB Camden, 2020. Draft Site Allocation Review. 10: Individual Development Sites.



43,000 sqm of workspace, approximately 2,500 sqm of retail and food and drink uses (Use Classes C3 and E) ('Development'). The Development will provide a new headquarters building for C&I.

There are no proposed healthcare service closures because of the Development: the number of inpatient beds would be maintained through re-provision in new off-site facilities. Outpatient services are proposed to be relocated to an appropriate facility such as the new C&I building on the Site or one of the integrated community mental health centres across the London Boroughs of Camden and Islington. This re-provision will be undertaken in accordance with a Decanting Strategy<sup>6</sup>.

The Development proposes the retention of seven heritage buildings, including the East, West and South Wing buildings, the gatehouse, the two chapels and the 'Residence' building, which all contribute to a rich historic character. The removal of several structures will be required to enable the development to come forward. The Development will deliver three new buildings (Plots A, C and D). The massing will be highest in the north-west of the Site (Plot D), furthest from St. Pancras Gardens to the south, a Grade II Registered Park and Garden ('RPG'). The Plot D will be the tallest building on-site and will extend up to a maximum of 16 storeys in height. There will be further excavation of existing basements to facilitate the Development. An indicative block layout plan is provided in Annex 1, Figure 3.

The design development is ongoing in collaboration with LB Camden and has involved a masterplanning exercise which has been presented to the Greater London Authority (GLA). A detailed description of the Development is provided in Annex 2.

## EIA Context

The Development does not fall within any of the descriptions of development listed in Schedule 1 of the EIA Regulations, and is therefore not a 'Schedule 1 development'. The proposals do fall within Category 10(b) of Schedule 2 of the EIA Regulations, which is applicable to 'urban development projects'. Schedule 2 development means development of a description referred to in Column 1 of the table in Schedule 2 where:

- "a) Any part of that development is to be carried out in a sensitive area; or*  
*b) Any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development."*

No part of the Development is to be carried out in a 'sensitive area' as defined in the EIA Regulations (i.e. a Site of Special Scientific Interest, National Park, the Broads, Area of Outstanding Natural Beauty, World Heritage Site, Scheduled Monument or European Site<sup>7</sup>). The thresholds for Category 10(b) projects is:

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<sup>6</sup> Camden and Islington NHS Foundation Trust, 2021. St. Pancras Transformation Programme: Summary of Plans.

<sup>7</sup> Now known as the national site network (NSN), as defined by the Conservation of Habitats and Species Regulations 2017 (as amended).



- “(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or*
- (ii) the development includes more than 150 dwellings; or*
- (iii) the overall area of the development exceeds 5 hectares.”*

The Development **does** exceed the first threshold. However, EIA is only required where Schedule 2 development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

### Potential for Likely Significant Effects

The Government’s online EIA guidance<sup>8</sup> for considering Schedule 2 development and the need for EIA states, *“Only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment”* (Paragraph 018). The key stage in the screening process is to consider whether the Development is *‘likely to have significant effects on the environment by virtue of factors such as nature, size or location’*. As required by Regulation 5(4)(c), where a relevant planning authority has to decide whether Schedule 2 development is EIA development, they must take into account (inter alia) the relevant selection criteria set out in Schedule 3, which include factors related to the characteristics and location of the development and the types and characteristics of the potential impact of the development on those factors.

Schedule 3 of the EIA Regulations states that the likely significant effects of the development on the environment must be considered in relation to specified criteria and taking into account (inter alia) the *“cumulation of the impact with the impact of other existing and/or approved development”*. The Screening Appraisal (Annex 2) considers the characteristics of the Development, including the potential for cumulative effects with other existing and approved developments.

Based on the findings of our Screening Appraisal, we find that the Development is unlikely to have significant effects on the environment and, as such, does not constitute EIA development. However, we request that LB Camden adopts a Screening Opinion to confirm this.

### Mitigation Measures

The EIA Regulations allow mitigation measures that would avoid or prevent what might otherwise have been significant adverse environmental effects to be taken into account by the decision maker when considering whether a development is EIA development. A summary of standard mitigation measures considered appropriate to mitigate effects with respect to this Development, as well as additional documents to be submitted to accompany the application, is provided below.

#### Construction

- Outline Construction Logistics Plan;

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<sup>8</sup> Ministry of Housing, Communities and Local Government, 2020. Planning Practice Guidance, Environmental Impact Assessment. Available at: <https://www.gov.uk/guidance/environmental-impact-assessment>



- Outline Demolition/Construction Management Plan, including a phasing strategy which will be sympathetic to the development of the Oriel Scheme to the north, to ensure that potential nuisance effects are avoided or reduced, where practicable;
- Construction Environmental Management Plan ('CEMP') (which would capture all construction mitigation measures discussed in Annex 2);
- Decanting Strategy proposes to ensure no reduction in existing services for the C&I NHS Trust; and
- Construction Traffic Management Plan ('CTMP').

### Design

- Massing and location of buildings which improves the setting of buildings within the Site and immediately adjacent within the Conservation Area;
- Design which positively contributes to the townscape and street scene;
- Acoustic attenuation (e.g. high specification glazing) for proposed residential uses and plant – to be detailed in Noise Assessment;
- Framework Travel Plan (to be submitted with planning application);
- Delivery and Servicing Management Plan;
- Surface Water Drainage Strategy including Sustainable Urban Drainage features (SuDS); and
- Landscape Strategy to achieve biodiversity net gain.

### Conclusion and Screening Opinion Request

Based on the findings of our Screening Appraisal, we have concluded that the Development is unlikely to give rise to significant environmental effects and, as such, does not constitute EIA development. However, we request that LB Camden adopts a Screening Opinion to confirm this.

As you will be aware, Regulation 5(5) requires that in their screening opinion, the local authority must (inter alia) state: *'the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3'*. We would be grateful if you could confirm receipt of this request and therefore the start date for the 21-day decision period and that you are satisfied you have sufficient information to adopt a screening opinion. Should you require any further information to prepare your screening opinion and reasons for your decision, please do not hesitate to contact me.

Yours sincerely,

Aisling Webb

Encl. Annexes 1 and 2

cc. Alexandra Woolmore, Argent  
Matthew Sherwood, Quod



## ANNEX 1

### Figures

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Figure 1: Site Location Plan

Figure 2: Environmental Sensitivities

Figure 3: Indicative Development Layout

Figure 4: Cumulative Schemes



Figure 1: Site Location Plan

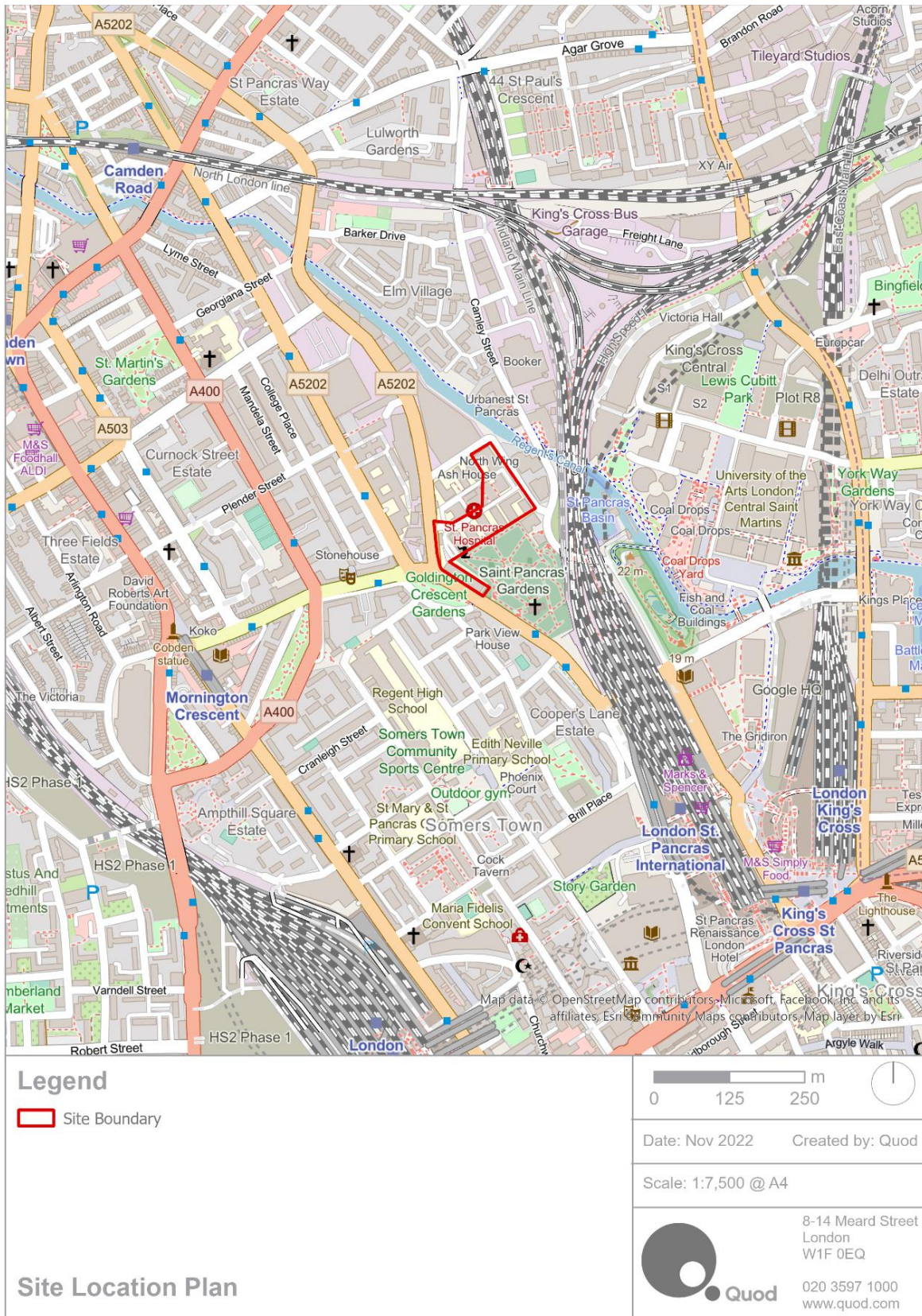
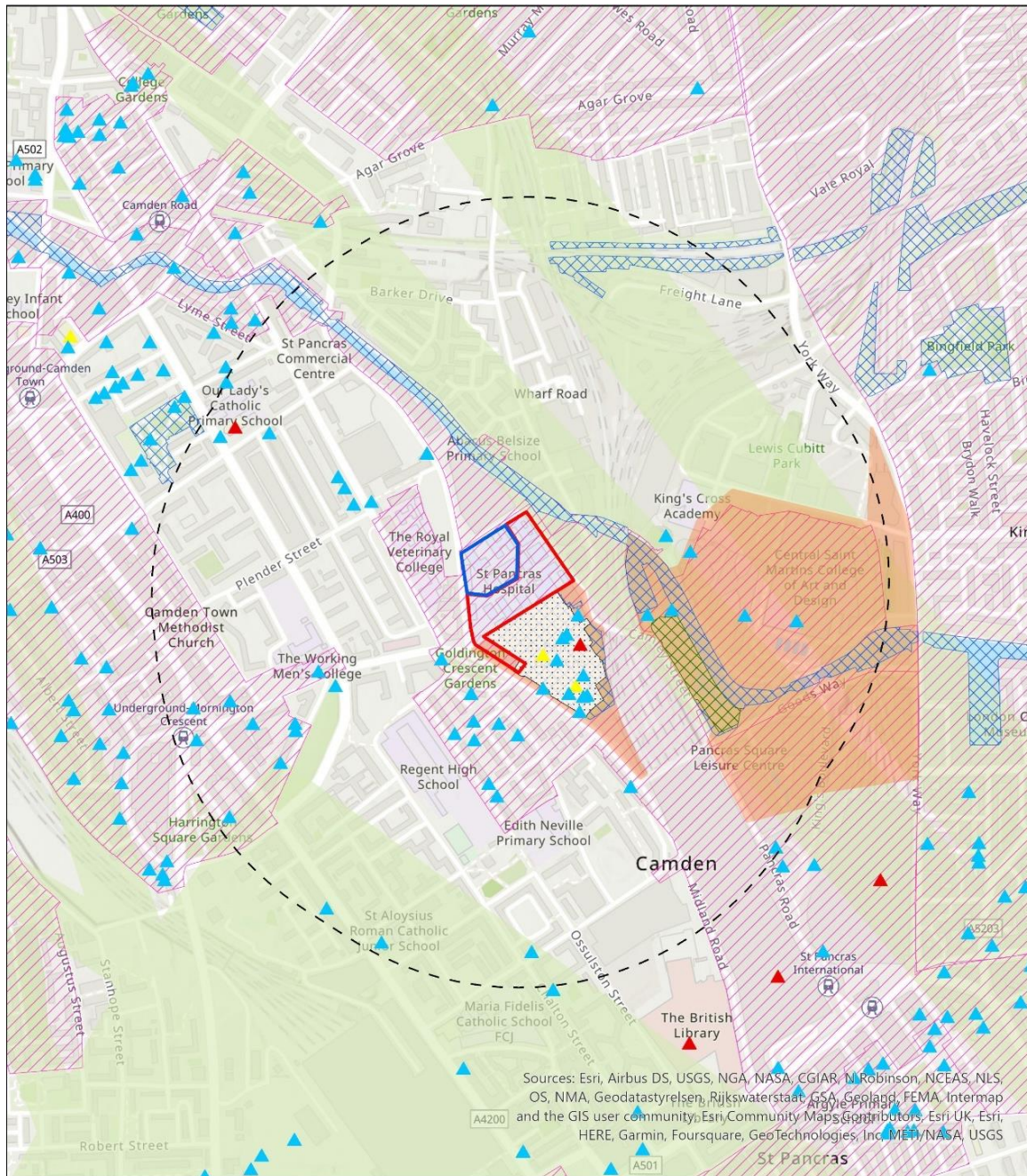




Figure 2: Environmental Sensitivities



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, M Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community, Esri, Community Maps Contributors, Esri UK, Esri, HERE, Garmin, Foursquare, GeoTechnologies, Inc, METI/NASA, USGS

**Legend**

- 500m Buffer Zone
- Site Red Line Boundary
- Oriel development site
- Sites of Importance for Nature Conservation
- Local Nature Reserves
- Protected Vistas
- Registered Parks and Gardens
- Archaeological Priority Areas
- Conservation Areas

**Listed Buildings**

- Grade**
- I
  - II\*
  - II

\* Entire extent of Site is within the Camden AQMA

**Environmental Sensitivities**



Date: Oct 2022 Created by: Quod

Scale: 1:8,000 @ A4



8-14 Meard Street  
London  
W1F 0EQ

020 3597 1000  
www.quod.com





Figure 3: Indicative Development Layout

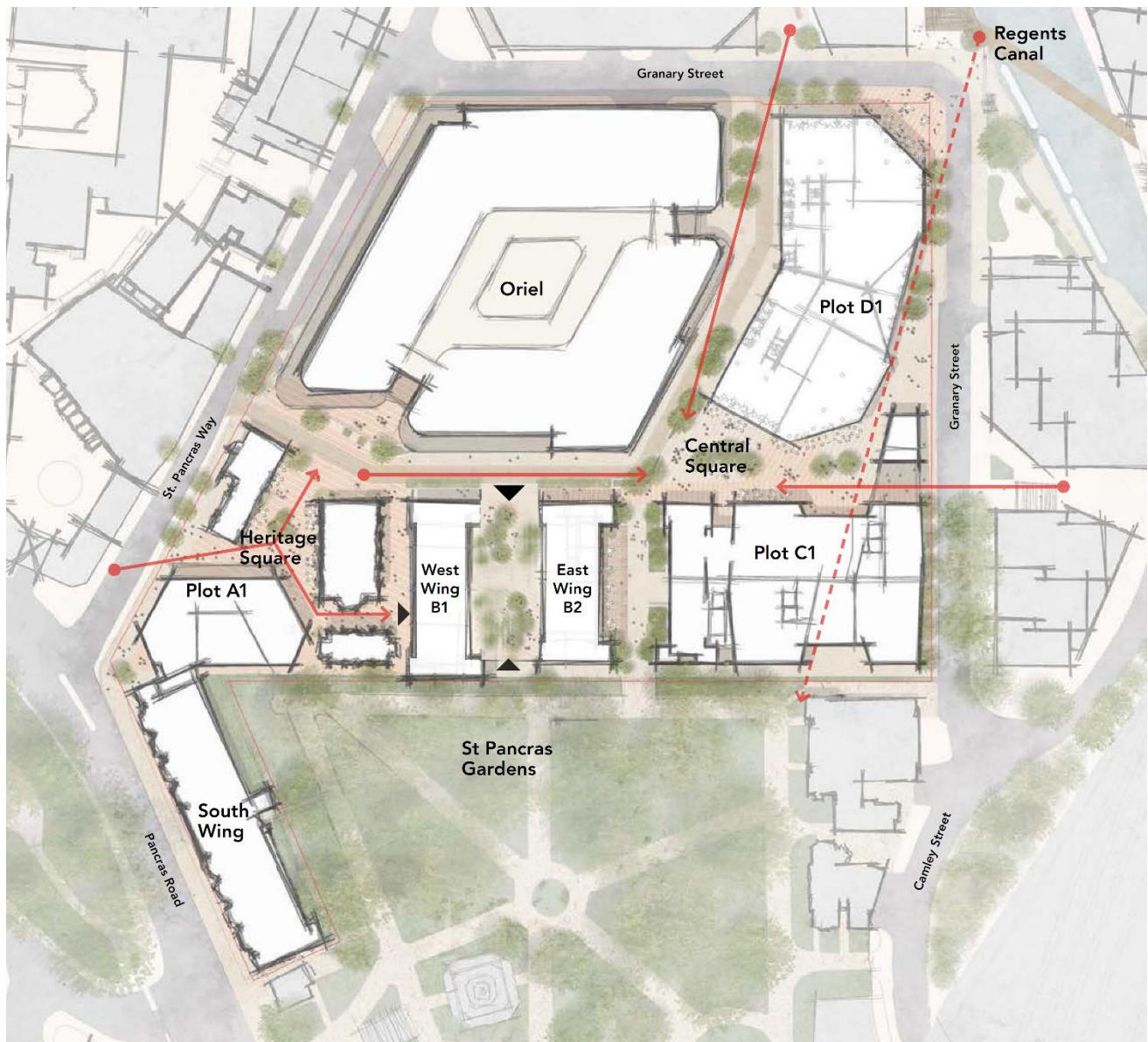
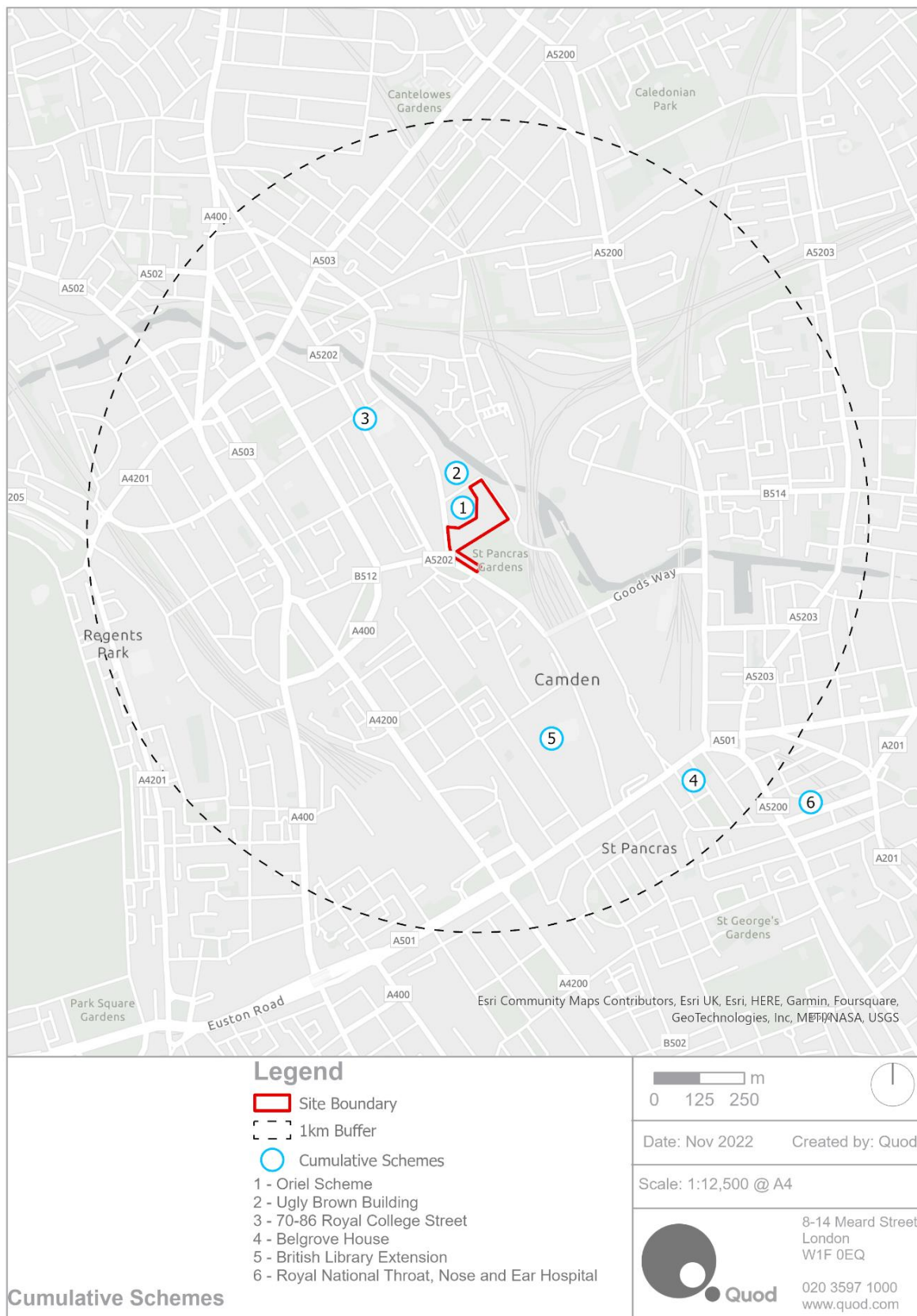




Figure 4: Cumulative Schemes





## ANNEX 2

### EIA Screening Appraisal: St. Pancras Hospital

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Schedule 3 of the EIA Regulations sets out selection criteria for screening Schedule 2 development, comprising the characteristics of the development, its location and the types and characteristics of the potential impact, including the possibility of effectively reducing the impact. This Annex provides an appraisal of the Development with reference to these criteria.

#### a. Site Location and Description

The Site comprises the eastern and southern extents of St. Pancras Hospital. It covers an area of 1.46ha and is centred at National Grid Reference TQ 29697 83631. The Site lies wholly within the administrative boundary of LB Camden. The extent of the Site is shown in Figure 1, Annex 1<sup>9</sup>.

St. Pancras Hospital is owned by the C&I NHS Foundation Trust (C&I) and the buildings on-site are currently in use, providing a number of services including but not limited to the St. Pancras Hospital Kidney, Diabetes and Eye Centre, rehabilitation services following illness, traumatic stress clinic, mental health crisis and non-clinical wellbeing services. The Site comprises thirteen buildings of various ages, internal circulation roads, 64 car parking spaces with limited amenity landscaping and occasional trees. There are some perimeter trees and planting along the St. Pancras Way (A5202) boundary which provide some screening to the car park area in the eastern portion of the Site. The thirteen buildings on-site are the North Wing, South Wing, the East Wing, the West Wing, the Gatehouse, the Residence Building, the Huntley Centre, the River Crisis Centre, the Well, the Post Room, the Kitchen, the North East Building and the Boiler House. Between the East and West Wing there is a small, landscaped courtyard garden with seating available. A brick wall, approximately in 2m height, encloses most of St. Pancras Hospital with occasional sections of wrought iron fence with planting. The existing buildings on-site vary in height, ranging from 2 - 7 storeys above ground, with a small basement present within the South Wing, and a limited area of lower ground floor present within the East and West Wing. Vehicles access the Site from the A5202 St. Pancras Way (A5202).

The Site wraps around the St. Pancras Hospital buildings which form the Oriel Scheme boundary to the north-west (planning permission granted on 5 August 2022 with reference 2020/4825/P). Granary Street is located to the north and east of the Site. The Regent's Canal is located beyond Granary Street to the north-east, with National Rail railway lines connecting to St. Pancras International Station beyond. St. Pancras Gardens are located directly to the south of the Site. St. Pancras Way (A5202) lies adjacent to the west of the Site. The Site surrounds are characterised by a mix of uses within a predominantly residential area, with schools, colleges and community centres. The Site, as well as the surrounding local area, is recognised as the 'Knowledge Quarter'; a focal point for one of the

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<sup>9</sup> All distances presented are from the Site Boundary at the closest point, unless otherwise stated.



greatest knowledge clusters in the world. The Knowledge Quarter is a consortium of partner organisations of over 100 academic, cultural, research, scientific and media organisations.

The Site is well served by public transport, with a Public Transport Activity Level (PTAL) rating of 5-6b. St. Pancras Station is located approximately 300m south-east of the Site at the closest point, providing access to the London Underground, National Rail and International Rail services. There are two bus stops within walking-distance of the Site; on Pancras Road and Eversholt Road approximately 210m south and 590m south-west of the Site, respectively. King's Cross Station, providing Network Rail services, is located approximately 860m from Site. Mornington Crescent is the next nearest London Underground Station approximately 570m west of the Site.

### Environmental Sensitivities

The Site is not located within a 'sensitive area' (as defined in Part 1 of the EIA Regulations) (i.e. a Site of Special Scientific Interest, National Park, Area of Outstanding Natural Beauty, World Heritage Site, Scheduled Monument or National Sites Network). The Site is not located within statutory or non-statutory designations for nature conservation.

The Site is located within the King's Cross / St. Pancras Conservation Area (CA), which is noted to have a great variety in character and appearance across the locale. There are seven non-designated heritage assets within the Site that make a positive contribution to the surrounding Conservation Area<sup>10</sup>. The Regent's Canal CA is located less than 10m at the closest point to the north and east of the Site. Within St. Pancras Gardens (a Grade II RPG), there are several listed buildings and structures including the Grade I listed Tomb of Sir John Soane, Grade II\* listed Burdett-Coutts Memorial Sundial and Old Church of St. Pancras, and several other Grade II listed structures. The Site is located within the St. Pancras Church and Burial Grounds Tier 2 Archaeological Priority Area (APA).

The Site falls within the Wider Setting Consultation Area of the Protected Vista from Assessment Point 2A.1 Parliament Hill to St. Paul's Cathedral as per the London View Management Framework (LVMF).

The closest ecologically designated sites are the Sites of Importance for Nature Conservation (SINCs) located immediately south of the site at St. Pancras Gardens and approximately 25m east of the Site along the Regent's Canal. There are several other SINCs within 1km of the Site (Figure 2, Annex 1). The Camley Street Natural Park is a Local Nature Reserve (LNR) managed by the London Wildlife Trust, located 200m south-east of the Site, beyond the railway tracks for St. Pancras International Station.

The Site is located entirely within Flood Zone 1 for risk of flood from rivers or sea. The Site is predominantly at a very low risk of surface water flooding, although there are some localised areas

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<sup>10</sup> LB Camden, 2004. Conservation Area Statement 22: King's Cross.



subject to a low to high risk of surface water flooding in the central part of the Site. The Site is also not located within an area at risk of reservoir flooding.

The Site is wholly situated within an Air Quality Management Area (AQMA), designated for exceedances in the annual mean nitrogen dioxide (NO<sub>2</sub>) objective and daily mean Particulate Matter (PM<sub>10</sub>) concentrations within the LB Camden.

The closest existing residential receptors are situated approximately 20m to the east along Granary Street at the 101 Camley Street Development, with additional properties to the east along St. Pancras Way. Future residential receptors will be relevant as new development comes forward within the surrounding area.

## **b. Size and Design of the Development**

The Applicant is seeking detailed planning permission for a mixed-use development to provide up to 120 residential units, up to 6,000 sqm of healthcare floorspace, up to 43,000 sqm of workspace, and up to 2,500 sqm of retail and food and drink uses (Use Classes C3 and E). The Development will provide a new headquarters building for C&I which will provide some outpatient services alongside related research and training facilities. A basement level is planned for this building. An indicative layout of the Development is shown in Figure 3, Annex 1.

The Development proposes the retention of seven heritage buildings (the South, East and West Wings, the Gate House, the Residence Building, the River Crisis Centre and the Well), with the design aiming to:

- Provide adequate spacing to improve the setting of heritage assets, activating them with new frontages and in turn activating the surrounding spaces;
- Create good lines of visibility to the buildings to recognize them as prominent features and define the character of the Development; and
- Provide good access to each building to facilitate new uses.

The Development would necessitate the removal of the following buildings:

- North East Building;
- Huntley Centre;
- Boiler House; and
- North Wing.

In addition, some small newer interventions to the River Crisis Centre and the East and West Wings will be removed.

A description of the Plots is as follows:

- **Plot A** – proposed for healthcare use as well as the new headquarters building for C&I and research/training facilities. Located in the south-western corner of the Site, this Plot will form a key edge to the Development and sits in the context of a number of heritage buildings and St.



Pancras Gardens. It will include a public facing, communally focused ground floor to support the healthcare uses across the building;

- **Plot B** – connecting the existing West and East wings of the existing St. Pancras Hospital, this Plot will involve the creative re-use of the buildings as flexible workspace with co-working/communal areas. It will deliver a new ‘greenhouse’ style space which will link the two existing buildings and provide a covered planted area for building occupiers and the public to enjoy. The ground floor will feature a mix of office related and retail/food and drink uses;
- **Plot C** – on the south-eastern edge of the Site, this pair of connected, new residential blocks will provide sensitively orientated buildings facing the adjacent Registered Park and Garden. The new building will link with the adjacent existing Residence Building, which will also be repurposed for residential use. As well as supporting residential uses, the ground floor would include a range of Class E uses;
- **Plot D** – on the north-eastern corner of the Site, next to the consented Oriel Scheme, Plot D is proposed as the tallest building, and provides the largest footprint for predominantly workspace use. The ground floor will feature back and front of house uses for the workspace above, as well as other active Class E uses. The Plot will also have a basement level; and
- **Plot E** – re-use of the existing South Wing building on St. Pancras Way to deliver a flexible workspace building with engaging ground floor uses.

The Development is expected to be constructed over a period of approximately 5 years.

### c. Use of Natural Resources and Production of Waste

Redevelopment of the Site would, by its very nature, require the use of a range of natural and man-made construction materials to complete the build and fit-out of the scheme. However, the retention and re-use of the existing West, East and South Wings will reduce the amount of construction waste generated compared to a scenario where all buildings on-site are demolished.

Opportunities to minimise volumes of waste going to landfill would be sought by the contractors in line with good site practice, so that demolition and construction materials are used efficiently on-site and wastes are recovered, re-used or recycled where practicable. Asbestos-containing materials are known to be present, having been used as an insulating material in some tunnels; these would be dealt with in accordance with the relevant legislation and guidance. The removal of wastes during the demolition and construction phase may lead to some indirect localised temporary effects, e.g. disruption on the road network for other road users, dust and noise, but these effects are not considered to be significant. The use of natural materials such as ply and timber will be kept to a minimum.

It is expected that the operational consumption of energy, water and other natural resources by the Development will be in keeping with similar mixed-use developments. Refurbishment of the historic buildings will introduce energy efficiency measures which would enhance their environmental performance compared to the existing condition. All buildings will comply with statutory requirements such as Building Regulations, reducing carbon emissions and fuel bills for the future use. The Development is not expected to result in significant energy usage or water intensive activities and will be managed appropriately through design and consultation with the statutory utility providers to avoid



any adverse impacts on their capacity to provide services. Therefore, it is considered unlikely that the Development will result in significant effects relating to the use of natural resources.

The completed Development would generate various waste streams including clinical waste within the healthcare floorspace. The management of clinical waste from the new C&I NHS Trust headquarters will be undertaken in accordance with relevant guidance<sup>11</sup> and disposed of in a similar method as currently managed by existing healthcare uses on-site.

The Development will provide the necessary waste storage and collection facilities, based on BS 5095: 2005 and LB Camden's waste and recycling storage guidance. The waste strategy for the Development will be described in the supporting documents to the planning application. An Operational Waste Management Plan will be secured subject to an appropriately worded planning condition.

Overall, it is expected that the operational consumption of energy, water and other natural resources by the Development will be in keeping with similar mixed-use developments and would not be significant.

#### **d. Socio-Economics and Human Health**

During construction, the Development is likely to result in employment opportunities, as well as spending by the construction workforce in the local area. Due to the mobile nature of the construction workforce, consideration of construction employment is best considered at the regional level. The likely effect of construction employment would be a temporary beneficial effect and is not considered significant. This is due to the relatively low magnitude of the potential effects in comparison with the scale of the broader regional construction workforce.

The Development will contribute towards LB Camden's aspirations by providing high quality residential development in line with the Local Plan (up to 120 homes). In the context of the region (London), the provision of new homes is beneficial in contributing towards meeting local housing requirements, although it is not considered to be significant in EIA terms.

The proposed workspace, retail and commercial uses will bring commercial opportunity to the Site, as well as affordable workspace. Based on the Business Register and Employment Survey (2021), there are nearly 400,000 jobs within the LB Camden, of which nearly 10% are based in the Local Area surrounding the Site (the ward of St Pancras and Somers Town). The employment on-site will be beneficial in socio-economic terms, but given the scale of employment within LB Camden, it is not considered to be significant in EIA terms.

Existing healthcare services currently delivered by the Site will be re-provided across several locations within the local area. There will be no pause in the delivery of the services because a Decanting Strategy is in place for the relocation of services. This will include some temporary moves and permanent moves, with some existing and new services to be provided on-site within Plot A as well

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<sup>11</sup> Department of Health, 2013. Environment and Sustainability. Health Technical Memorandum 07-01: Safe Management of Healthcare Waste.



as at new or refurbished facilities at Highgate East, Highgate West, Greenland Road, Lowther Road, Gray's Inn Road and Regis Road.

The Development will provide playspace having regard to the Mayor's Play and Informal Recreation SPG<sup>12</sup> and Policy S4 of the London Plan. Open spaces will be provided having regard to Policy A2 of the LB Camden Local Plan.

Any additional demand for healthcare and education services generated by the increase in population on-site would be mitigated, where necessary, through financial contributions made through Community Infrastructure Levy (CIL) payments and/or a Section 106 agreement if required.

A Health Impact Assessment will accompany the planning application. This will set out further details on the Decant Strategy relating to the existing services and the potential impacts associated.

## **e. Pollution and Nuisances**

### **Transport and Access**

Transport effects during construction are not expected to be significant. Construction traffic routes, movements and associated effects such as driver disruption, dust and dirt nuisances would be dealt with through standard and widely used management measures. These measures will be controlled via the CEMP. The net change in Heavy Goods Vehicles ('HGVs') and light vehicular traffic flows on the local road network during construction of the Development is not expected to be significant in the context of existing traffic flows on the surrounding highways. This is due to the likely phasing of the Development and ease of access onto the strategic road network via the A5202 St. Pancras Way. The programme of Development will be sympathetic to the development of the Oriel Scheme to the north-west, ensuring that the proposed construction phasing will avoid or reduce potential nuisance effects for new and future receptors. The Applicant and design team have regular co-ordination meetings with the Oriel Scheme development team to ensure construction and logistics of the two schemes are coordinated.

Transport effects once the Development is complete and operational are not considered to be significant. The Development is designed to promote and facilitate access to sustainable travel modes. Existing car parking on-site comprises 44 permit bays, 9 contractor bays, 7 disabled bays, 2 motorcycle bays and 2 carpool bays. As the Development has a PTAL rating of 5-6, it will be 'car-free' in line with the LB Camden Local Plan (Policy T2); only blue-badge disabled parking spaces for 3% of residential units and non-residential land uses will be provided. The Development will result in a reduction in the region of 60 car parking spaces on the Site.

An initial trip generation assessment has been undertaken as part of a Transport Scoping Note<sup>13</sup> submitted during the pre-application stage (presented in Annex 3). The Development will result in an

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<sup>12</sup> Greater London Authority, 2012. Shaping Neighbourhoods: Play and Informal Recreation. SPG.

<sup>13</sup> Caneparo Associates, 2022. Transport Scoping Report: St. Pancras Hospital Masterplan.





uplift in all associated trips, reflecting the proposed increase in floorspace. It is estimated that there will be a reduction in car trips by 32 cars in the AM peak hour and 31 in the PM peak hour.

There will be an increase in the number of trips associated with sustainable transport modes, although these are not expected to give rise to significant effects. It is considered that the excellent provision of existing public transport services in the area has sufficient capacity to support the number of trips associated with the Development. A Travel Plan will be prepared that promotes sustainable transport modes. The Travel Plan will include measures such as using the nearby bus stops and pedestrian facilities in / around the Site, as well as ensuring sufficient cycling facilities are provided to encourage active travel. As such, the effects on public transport are not considered to be significant in EIA terms.

The consented Oriel and Ugly Brown Building schemes also promote a sustainable travel approach for future users, avoiding significant increases in highway traffic and associated capacity effects. Therefore, no significant in-combination effects are expected.

For the reasons set out above, it is considered that the demolition, construction and operational effects of the Development would not be significant. The planning application will be supported by a Transport Assessment which will assess the existing conditions of the local area and the proposed changes to be brought forward by the Development.

### Noise and Vibration

The Site is in a mixed-use urban area of residential, commercial and retail uses. The ambient noise and vibration environment is primarily influenced by rail and road traffic sources, particularly the adjacent St. Pancras Way and the railway infrastructure to the east heading towards St. Pancras Station. The closest residential receptors are situated approximately 20m to the east at the 101 Camley Street Development. Future sensitive receptors include residential receptors within the consented scheme at the Ugly Brown Building site (north of Granary Street) and the healthcare uses associated with the Oriel Scheme.

The Development is expected to be constructed in approximately 5 years (following the grant of planning permission). Given the existing ambient noise environment and the proposed standard mitigation measures to be implemented (such as appropriate location and specification of plant), the Development is unlikely to result in significant construction noise or vibration effects on nearby sensitive receptors (including future receptors). There are likely to be temporary short-term increases in noise during the demolition and construction works, including noise resulting from construction plant and vehicles. Noise sources will be controlled by industry standard good practice measures including acoustic screening / site hoardings, the selection of appropriate construction techniques and the restricted operation of certain plant and activities to agreed hours. These measures will be controlled via the CEMP. HGVs accessing / egressing the Site have the potential to cause highly localised vibration effects; however, these effects are not expected to be significant at the sensitive receptors.

Where a receptor is affected by continuous traffic flow, significant increases in traffic flows are required to generate a 'just perceptible' change of 3dB. The volumes of road traffic to be generated by construction and the completed Development would not lead to a perceptible increase in overall traffic noise. Traffic relating to the Development will be minimised through good practice measures, including



the Travel Plan. It is therefore considered unlikely that traffic associated with the Development would give rise to any significant effects on nearby noise- or vibration-sensitive receptors.

The Oriel and Ugly Brown Building schemes will also implement industry standard good practice measures to reduce the effect of noisy or vibration-generating activities. Regular liaison with the construction teams of these schemes will be maintained to coordinate noisy or vibration-generating activities taking place on the sites, to ensure associated effects are reduced, as much as practicable. Therefore, no significant in-combination effects are expected.

The Development will feature on-site plant associated with the healthcare and commercial uses. Where plant is required, noise will be limited to acceptable thresholds and located away from sensitive receptors as far as practicable. Mitigation measures may include plant enclosures, screens and / or attenuated ventilation systems. It is considered unlikely that the Development would give rise to significant effects from operational plant noise.

The Development will be subject to appropriate acoustic design and glazing and ventilation principles to protect future residents' amenity. These measures will be detailed in a Noise Assessment which will consider the impact of existing noise levels on future occupiers of the Development. The Development will be designed to meet internal noise level requirements of BS 8233:2014, as well as LB Camden's requirements.

As such, it is not considered that there will be significant noise and vibration effects as a result of construction works or operation of the Development.

### Air Quality and Odour

The Site is located within the LB Camden Borough-wide AQMA, declared due to exceedances in annual mean NO<sub>2</sub> and daily mean PM<sub>10</sub>. The principal air pollutants of concern with respect to the Development will be NO<sub>2</sub> and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>).

The closest sensitive receptors which may potentially be affected by the Development include residential receptors along Granary Street as well as the residential properties and student accommodation along St. Pancras Way. Future residential receptors introduced through emerging development within the surrounding area are also considered, as well as the future hospital patients and visitors to the Oriel Scheme to the north.

The greatest potential air quality effects relate to dust nuisance during construction of the Development. With the implementation of good practice measures set out in the CEMP to minimise and control dust at source during construction, effects are unlikely to be significant. Method statements will be provided and will include measures such as hoarding, water suppression and covering of transport vehicles. Method statements will be based on industry standard guidance published by the Institute of Air Quality Management. Construction plant and equipment used for construction works will be modern and compliant with current EU emissions standards and as such, exhaust emissions during construction works are not expected to give rise to significant adverse effects. These measures will be set out in the CEMP. Overall, no significant effects during the construction phase are expected.



Road traffic generated by the Development would result in emissions of NO<sub>x</sub> and particulates and may impact local air quality. However, as noted above, Development-generated car trips are expected to reduce by 32 trips in the AM peak and 31 trips in the PM peak. Emissions are therefore unlikely to be significant in the context of existing traffic flows. There are no sources of odour within or in close proximity to the Site that could affect future residents of the Development.

The Oriel and Ugly Brown Building schemes will also implement industry standard good practice measures to reduce the effect of dust or air emission generating activities. Regular liaison with the construction teams of these schemes will be maintained to coordinate dust or air emission generating activities taking place on the sites, to ensure associated effects are reduced, as much as practicable. Therefore, no significant in-combination effects are expected.

The Development will be for a mix of healthcare, workspace, residential and commercial uses. The energy strategy will be focussed on minimising emissions as far as possible, with no provision of gas supplies within residential units or retail, although there may be limited provision in kitchens for food and beverage uses. The nature of the Development is such that it would not be likely to release a significant level of pollutants or any hazardous, toxic or noxious substances into the air. Emissions from plant would be dealt with by standard measures and conditions.

Notwithstanding this, a standalone Air Quality Assessment will be undertaken and submitted with the planning application. The Air Quality Assessment will inform the design of the Development and appropriate design mitigation will be incorporated into the Development to ensure that residents are protected from poor air quality. These measures would be detailed in the planning application. As such, it is not considered that the construction or operational effects of the Development on air quality would be significant.

### Ground Conditions and Contamination

British Geological Survey (BGS) maps for the area show the Site is underlain by bedrock geology of the London Clay Formation at a depth of 30m, with a sequence of the Lambeth Group, Thanet Formation and the White Chalk subgroup beneath.

Historically, the Site was occupied by the St. Pancras Workhouse. This past use in addition to the current use as a hospital could have resulted in the presence of localised ground contamination. Industrial activities associated with railways in the vicinity of the Site and various offsite historical sources including an ale store/granary, gas works, St. Pancras Generating Station, a refuse treatment plant and the Metropolitan Cattle Market may also be potential sources of contamination.

A walkover survey will be undertaken, and a Phase 1 Land Contamination Assessment will be submitted to accompany the planning application. Subject to the results of the Phase 1 Land Contamination Assessment, remediation, validation and construction of the Development will be undertaken in line with standard practice and legislative requirements. This will ensure appropriate management of any contamination if present and minimise pollution risks to controlled waters and to human health of construction workers. These measures will be secured through the remediation strategy and CEMP. As such, significant environmental effects are not considered likely to occur during construction.



The Oriel and Ugly Brown Building schemes will also implement industry standard good practice measures to address risks from ground conditions. Therefore, no significant in-combination effects are expected.

On completion of the Development, much of the Site will be covered with new buildings, hardstanding and landscaping; as such, the risk to receptors (namely human health) will be low. There would be no likely significant effects related to ground conditions or contamination from the completed Development.

### Water Resources, Flood Risk and Drainage

The Regent's Canal runs adjacent to the eastern boundary of the Site. The Site is located entirely within Flood Zone 1 for risk of flooding from rivers and sea. The Site is predominantly at a very low risk of surface water flooding, although there are some localised areas subject to a low to high risk of surface water flooding in the central part of the Site. The Site is not located within an area at risk of reservoir flooding.

The planning application submission will set out the proposed SuDS measures to restrict surface water discharge to ensure the Development does not give rise to significant flood risk elsewhere. Due to the emerging nature of the proposals, details on the drainage strategy are not yet known. A Flood Risk Assessment (FRA) will be prepared in line with NPPF and LB Camden requirements and will accompany the planning application. A Surface Water Drainage Strategy will be developed based on the results of the FRA (which will include a climate change allowance) and will also accompany the planning application. In line with policy, the FRA and Surface Water Drainage Strategy will ensure that the proposals do not result in increased flood risk off-site and sufficient measures are incorporated into the design to achieve the required runoff rates. As a result, no significant effects on water resources, flood risk and drainage are anticipated.

Potential risks to water resources during construction will be controlled through standard measures agreed with LB Camden. These will form part of the CEMP and may include measures such as bunding of storage areas, petrol interceptors and good site management. In addition, a Basement Impact Assessment will be undertaken as further excavation will be undertaken to facilitate the Development. Potential pollution sources within the completed Development (e.g. oils from vehicles in surface water runoff) will be dealt with through standard design measures and the incorporation of a Surface Water Drainage Strategy. As such, the Development is not likely to result in any significant water quality effects.

The Oriel and Ugly Brown Building schemes will also implement industry standard good practice measures to reduce risk to water resources and flooding. Therefore, no significant in-combination effects are expected.

The completed Development will lead to an increased demand for potable water and foul water discharge as a consequence of the new residential and commercial uses, however it is not considered the effects would be significant. The Development would minimise the use of potable water in line with Operational Requirements of Building Regulations. The Development will also achieve the BREEAM excellent standard for the 'Wat 01' water category or equivalent for the non-residential elements of the Development.



Overall, no likely significant effects with respect to water resources, flood risk and drainage are expected.

#### **f. Archaeology**

There are no World Heritage Sites, Scheduled Monuments or registered battlefields within 1km of the Site. The nearest Scheduled Monument is the Benedictine Nunnery of St. Mary, Clerkenwell located approximately 2.25km south-east of the Site. The Site is in the St. Pancras Old Church and Burial Grounds APA (Tier 2), as defined in the Scheduled Ancient Monuments and Archaeological Areas Act (1979)<sup>14</sup>. The Site is also located approximately 75m west of the 'Kings Cross Basins, Granary Building, Market and Gas Works' area of the Regents Canal and Rail Infrastructure APA (Tier 2).

Basement levels are planned within Plots A and D as part of the Development and therefore could have potential for truncation of archaeological remains within the Site. Based on the submitted Archaeological Desk Based assessment<sup>15</sup> for the Oriel Scheme, existing buildings within the Oriel Site are located on top of the 19th century workhouse and there are several drainage systems likely to have impacted any remains on-site. The submitted Basement Impact Assessment<sup>16</sup> for the Oriel Scheme planning application highlights that the foundations for the existing mid-late 20th century buildings will likely have pad or pile foundations which are likely to have truncated or removed archaeological remains. Given the proximity of the Oriel Scheme Site, it is anticipated that the conclusions of this assessment will be relevant to the Site. To facilitate the delivery of the existing basement level of the South Wing and the lower ground levels of the East and West Wings, there will have been truncation of any existing below ground remains. Any future findings during excavation for future basements could therefore have been degraded to date.

A desk-based archaeological assessment will be undertaken as part of any future planning application to consider the archaeological potential of the Site and the potential for any impacts as a result of the Development. If required, a programme of archaeological works will be undertaken for the relevant parts of the Site prior to commencement on-Site. The scope of any such archaeological works would be agreed with LB Camden and GLAAS in advance and subject to an overarching WSI for approval. Overall, no likely significant effects with respect to archaeology are expected.

#### **g. Built Heritage**

The Site is located within the King Cross St. Pancras CA and forms a substantive part of Sub-Area 1: St. Pancras Gardens. The current conservation area statement ('CAS') was adopted in 2003, prior to substantial changes and significant development within the wider CA to the north of Kings Cross, changing the surrounding context and the CA's character and appearance. Sub-Area 1 will also change following the consent of the Oriel project and the Ugly Brown Building, and construction of the 101 Camley Street development. The Site contains several buildings forming St. Pancras Hospital, some of which were buildings of the former St. Pancras Workhouse. The earliest of these, the South Wing, dates from 1885-7; along with three pavilion blocks (known as the East and West Wings and

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<sup>14</sup> Scheduled Ancient Monuments and Archaeological Areas Act, 1979.

<sup>15</sup> AECOM, 2020. Oriel, Archaeological Desk Based Assessment, October 2020. File: File: ORL-INF-XX-XX-RP-PL-140.

<sup>16</sup> AECOM, 2020. Oriel, Basement Impact Assessment, October 2020. File: ORL-INF-XX-XX-RP-PL-330.



the Residence Building) (1891), the Gatehouse and two former chapels (1899). Other buildings date from 1930s-present.

Within a 500m radius of the Site, there are 56 designated listed buildings and Registered Parks and Gardens. On the immediate southern boundary of the Site lies the Grade II RPG of St. Pancras Gardens, which was laid out in 1875 on the site of St. Giles' Burial Ground and St. Pancras Burial Ground.

The gardens contain a number of funerary monuments and memorials. Of these, nine are listed. The most highly graded are the Tomb of Sir John Soane (Grade I) and the Burdett-Coutts Memorial Sundial (Grade II\*). The gardens also contain the Old Church of St. Pancras (Grade II\*) and drinking fountain and boundary gates (Grade II). The St. Pancras Coroner's Court building (Grade II) sits 25m from the south-east boundary of the Site, also sharing a boundary with St. Pancras Gardens. In the wider area, listed buildings are a mix of residential, civic and entertainment buildings, and to the east, former railway related structures.

With regards to the Site's contribution to the setting of these designated heritage assets, the Site has a relatively contained nature and character, comprising a mix of buildings of different architectural styles and ages which make up a large part of the current St Pancras Hospital. To a great degree, the historical connection between the Site and its surroundings is limited, due to the contained character of the historical uses on the Site (workhouse then hospital) and strong physical boundary. Visually, the character of the buildings on the Site are experienced as part of a wider urban grain which has a robust visual character, including new development to the east, which will continue with the imminent construction of Oriel to the north. Consequently the contribution of the Site to the individual settings of these surrounding assets, either as part of a surrounding developed urban grain (visual), or of historic connection (use and legibility of former uses), is accordingly limited.

The emerging proposals for the Development include the refurbishment of the nineteenth century workhouse buildings (namely the East and West Wings, the Residence Building, the South Wing, the Gatehouse and the two Chapels), with additions sympathetic to their significance. These proposals are considered to have the potential to better reveal the heritage significance of the Site and result in positive enhancements to these buildings as non-designated heritage assets and the Site's contribution to the CA. The CAS identifies which buildings at St Pancras Hospital were considered to be positive contributors to the CA, in 2003. Within the Site, it is assessed that the East and West Wings, the Residence Building, the South Wing, the Gatehouse and the two Chapels all make a strong contribution to Sub-Area 1, and a lesser contribution to the wider CA as a whole. In addition, two of the twentieth century buildings (North Wing and the Boiler House) on-site have been identified as positive contributors to the CA within the CAS, although are of a lower degree of quality and interest. Both are assessed to be of a low contribution to the conservation area as a whole. The Development will result in the demolition of these two twentieth century buildings, along with some structures of no architectural or historical interest, such as later twentieth century accretions. Some harm (of a very low, less than substantial, nature) is likely to arise from the Development from the demolition of the identified positive contributors to the CA, as a result of their identified positive contribution within LB Camden adopted guidance. This will not constitute a significant environmental effect in EIA terms due to the minimal overall effect of the loss of these buildings on the CA, as a whole, as the designated asset.



Other parts of the proposals will result in a greater degree of change on the Site, through the introduction of buildings of greater height and mass. These new buildings will undergo rigorous design testing with consideration of the surrounding sensitivities in relation to the setting of surrounding listed buildings, in particular St. Pancras Gardens and its collection of listed monuments to the south. As such, the new proposed buildings are expected to be of very well-considered design and with distribution of scale sensitively positioned, with the greatest scale and height stepping up to the north of the Site away from the most sensitive heritage assets.

With regards to construction, it is expected that best-practice mitigation measures will be put in place to minimise any short-term impact on surrounding heritage assets, the ability to appreciate these assets and the non-designated heritage assets on the Site, during the construction process. These will be set out in the CEMP. Some minor effect on the ability to appreciate the setting of very close heritage assets may arise for a short duration of time, with no significant effects anticipated.

It is anticipated that the Development will not result in any significant environmental effects in relation to built heritage due to (1) the embedded mitigations such as refurbishment and restoration of the workhouse buildings; (2) aspects of the design which will better reveal the significance of the Site's history of use and aspects of workhouse design; and (3) the limited contribution the Site makes to the setting of identified heritage assets outside of the Site's boundary.

With regards to significant built heritage in-combination effects, the effects of the Oriel scheme were not considered to be significant in EIA terms during the Oriel planning determination process. Proposals for the Development are not anticipated to result in any significant environmental effects and no significant in-combination effects are expected with regards to built heritage.

A detailed Heritage Statement assessing the significance and setting of heritage assets will be prepared and submitted as part of the planning application. This will set out an assessment of the impact and effects of the Development using recognised methodology in accordance with relevant legislation, national and local planning policy, and Historic England guidance and advice.

## **h. Townscape and Visual Impact**

The Site has a mixed townscape context of development of varying ages, heights and architectural styles. There are a number of emerging and recently completed schemes, including close to the Site the Oriel scheme on the corner of Granary Street and St Pancras Way; the Ugly Brown Building to the north; and on Camley Street to the north and east. Most of the recent schemes, particularly those mentioned above, are of a greater scale than much of the earlier development in the area. Based on the current testing of the Development, with a maximum height of 16 storeys for the tallest building on Plot D (likely 4m floor to floor heights for workspace use), with other Plot heights stepping down from this, the Development is likely to be seen conjunction with these schemes in views. The railway lines to the east and the canal to the north-east create both visual and physical barriers in the area. The wider area includes the Kings Cross masterplan area to the east and, to the south-east, St Pancras and Kings Cross stations (both Grade I listed).

The Site lies within the wider setting consultation area for LVMF 2A.1 from Parliament Hill: the summit – looking towards St. Paul's Cathedral. Based on a maximum height of 16 storeys for Plot D it is expected that part of the Development will be visible within the viewing corridor, at the very edge. It is



not anticipated that the Development will affect the viewer's ability to recognise and appreciate St. Paul's Cathedral within this viewing corridor.

The Site at present is closed off from the local area, with a boundary wall which creates a visual and physical barrier. The proposed scheme seeks to open up the Site, creating routes through it and providing new public spaces. The scheme will increase permeability in the area, improve access to the canal, and animate and enhance the street frontages. The Development therefore has the opportunity to enhance the townscape of the Site and the local area.

The Development will be seen in a number of views from the local and wider area. The Site is located in a largely built up part of London, with a relatively flat topography in the immediate area which results in more limited visibility than one might imagine from some parts of the surrounding townscape. The possible visual effects of the scheme at a range of heights and up to the tallest at 16 storeys on Plot D have been tested throughout the design development process, with the intention of mitigating any harmful effects that may arise as a result. The massing has been adjusted as a result of this process, taking into account the most sensitive areas within the Site's context.

The Development comprises three new buildings that have been developed to be mindful that they will be read within the townscape of the existing buildings on-site and with the neighbouring Oriel scheme. By virtue of providing the taller building in the north-west of the Site, the overall skyline composition to the emerging cluster of buildings appears balanced.

The overall height has been tested through design development. The external edges of buildings are faceted to relate to the existing context, space and routes to allow for a positive visual connection from Regent's Canal to St. Pancras Gardens.

In addition, the step down in height from the north-east (the tallest proposed building), to the lower scale buildings in the south and west provides a transition in scale. Again, the overall composition has been informed by views testing. The massing and orientation of the buildings within the plots is considered balanced.

Subject to the final detailed design, the effects of the Development will be beneficial on the immediate townscape. The Development will provide an appropriate and high-quality response to the existing architectural character of the area with a consistent high level of architectural and urban design quality. It is therefore anticipated that there will be no significant adverse effects on townscape and visual receptors as a result of the Development; and no significant effects to Townscape Character Areas as receptors.

With regards to construction, it is expected that best-practice mitigation measures will be put in place to minimise any short-term impact on the townscape and views during the construction process. These will be set out in the CEMP. Whilst some effect will occur, this is likely to be of a minor nature for a short duration of time, with no significant effects anticipated.

With regards to significant in-combination effects, the townscape and visual impact effects of the adjacent Oriel scheme, which is comparable in scale with the Development, were not considered to be significant in EIA terms, as determined during the Oriel planning process. Proposals for the





Development will be designed in accordance with good design principles, taking into account existing and emerging context including the Oriel scheme. Significant in-combination effects are not expected.

A Townscape and Visual Impact Assessment will be prepared and submitted as part of the planning application. This will set out an assessment of the impact and the effects of the Development using recognised methodology and in accordance with relevant planning policy and guidance.

## **i. Biodiversity and Arboriculture**

An extended Phase 1 Habitat Survey has been undertaken to review the current ecological conditions of the Site and undertake an external assessment of the buildings and trees present on-site. The results of the survey are provided within a Preliminary Ecological Appraisal (PEA) presented in Annex 4.

There are no ecological designations on the Site. The nearest statutory or non-statutory ecologically designated site is the St. Pancras Gardens SINC directly to the south of the Site boundary and the Regent's Canal SINC located approximately 25m east of the Site boundary at its closest point. London Canals Local Nature Reserve (St. Pancras Lock) is located 100m north-east of the Site. Camley Street Local Nature Reserve, known to support bats, is located 230m south-east of the Site and connects to the Regent's Canal. The Site is surrounded by urban development, with mature trees and vegetation within the RPG to the south. The nearest LNRs are designated for their educational value and are managed to tolerate high levels of use and the Development is therefore not considered likely to significantly increase recreational pressure on designated sites.

The Site currently comprises predominantly buildings, hardstanding, introduced shrub and scattered trees along the east and west boundaries. A small landscaped amenity grassland is present between the East and West Wings. The amenity grassland is mown and managed for public use and has a lack of biodiversity.

As the Site is located in a dense urban context, it is subject to high levels of noise and light pollution which is a general deterrent for bats to forage and commute. Additionally, with the exception of mature trees, there are no habitats on-site of value for foraging and commuting bats and there is therefore a negligible potential to support foraging and commuting bats. However, the St. Pancras Gardens SINC has good mature tree cover and is unlit at night, providing an area of reasonable bat foraging habitat and therefore has low potential to support community and foraging bats.

An external buildings assessment was undertaken to determine the potential to support roosting bats. None of the potential roosting features identified are considered suitable for hibernation or maternity roosts and would only be used as summer feeding/transitional roosts by common crevice dwelling species. No ingress points into roof voids or significant cavities were observed. Accordingly, the Site is considered to have low/moderate potential to support roosting bats. Should works to the buildings identified as having potential to support roosting bats involve works within/to the roof, there is a risk of disturbing or destroying a bat roost or killing/injuring bats. Should works be undertaken to these



features, emergence/re-entry surveys will be undertaken in accordance with CIEEM Guidance<sup>17</sup> to confirm the presence/likely absence of roosting bats and identify an approach to mitigation.

Works to trees/shrubs on-site, the water tower, chimney and clock tower all have potential to impact nesting birds. Works to these areas, if required, should be undertaken outside of the nesting season (the nesting season being generally March to August inclusive) or after an ecologist confirms the likely absence of nesting birds immediately prior to works.

Appropriate measures will be adopted during the construction phase to limit the occurrence of adverse effects on any sensitive ecological receptors, including noise, dust and lighting effects. These will be set out in the CEMP. An Ecological Management Plan (EMP) will be produced and implemented for the Site which will be secured through an appropriately worded planning condition. An Arboriculture Impact Assessment will be prepared and submitted to accompany the planning application and an Arboricultural Method Statement will be secured through an appropriately worded planning condition. A Lighting Strategy will be submitted to accompany the planning application and will incorporate measures to protect bat species in line with Institute of Lighting Professionals Guidance<sup>18</sup>. This involves minimising the duration of lighting through control measures such as sensors, use of appropriate luminaires in the warm-white colour spectrum and use of the lowest suitable level of illumination possible,

The landscape design of the development will incorporate features that will encourage bringing nature back to the Site and contribute to a biodiversity net gain of over 10%. The landscape masterplan will focus on a number of green public spaces across the Site; these will be influenced by the Site's heritage context and the neighbouring Regent's Canal. Biodiversity measures could include features such as vertical planting, diverse planting palettes, installation of artificial nesting sites and living roofs.

The Oriel and Ugly Brown Building schemes will also implement industry standard good practice measures for protection and enhancement of ecology and biodiversity. However, this is not considered to be significant in EIA terms. Therefore, no significant in-combination effects are expected.

Consequently, it is not anticipated that the Development will result in significant ecological effects.

## **j. Microclimate: Wind**

The Site is currently occupied by existing buildings of the St. Pancras Hospital which are approximately seven storeys in height. The Site is surrounded by minor roads and St. Pancras Way (A5202), a busy strategic road. The Site is relatively exposed to westerly winds due to the nature of the surrounds in that direction, which consist of generally low-rise buildings and areas of open space for several hundred metres.

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<sup>17</sup> Collins, J. (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines. 3rd edition. Bat Conservation Trust, London.

<sup>18</sup> Institute of Lighting Professionals and the Bat Conservation Trust, 2018. Guidance Note 08/18. Bats and Artificial Lighting in the UK.



The Development will likely bring an increase in pedestrians walking in and around the Site. The Development will extend to approximately 16 storeys at its tallest point, and will be in keeping with the existing and emerging development within the surroundings of the Site. Introduction of additional height, however, may lead to wind impacts including potential for downdraughting of faster-moving and high-level winds. There would also be an increased sensitivity to wind in some areas of the Development due to the provision of outdoor amenity space and entrances and walkways to new Plots delivering healthcare uses. This increases the number of receptors where calmer winds are required for the intended use of the space.

A wind assessment using computational fluid dynamics (CFD) will be carried out to establish the likely wind conditions. Mitigation measures will be incorporated into the design as required, and could include landscaping measures derived via desk-based assessment or modifications to the scheme design derived by further mitigation testing (such measures potentially could include canopies, fins, screens, massing changes etc). The design of the Development will have input from a wind engineer to ensure that the wind conditions are predicted to be safe and comfortable for pedestrians and residents. This process will take into consideration nearby emerging development schemes. On this basis, it is not anticipated that the Development is likely to give rise to significant effects either standalone or in-combination.

#### **k. Microclimate: Daylight, Sunlight, Overshadowing, Light Pollution and Glare**

The potentially sensitive receptors to daylight, sunlight and overshadowing effects are the surrounding residential receptors at 101 Camley Street to the east, future receptors associated with the redevelopment of the Ugly Brown Building to the north and residences and student accommodation to the west on St. Pancras Way.

The scheme design is being informed by daylight, sunlight and overshadowing studies, having particular regard to the guidance and recommendations set out in the BRE guide to minimise the level of potential effect upon existing and future residential dwellings.

Careful layout design has been explored to ensure a good level of daylight and sunlight compliance across the scheme. A 3D model will be constructed to examine the levels of achievable daylight and sunlight within the neighbouring habitable rooms at the first residential floor of the proposal.

Facade details for the design proposals are currently unconfirmed, but Plots will not have a significant reflective value and consideration of solar glare will be incorporated within ongoing design development to ensure that road users along the St. Pancras Way and Granary Street remain unaffected by the completed Development. While Plot B may include reflective materials due to the 'greenhouse' nature of the design, this Plot will be surrounded by the East and West Wing and will not be visible from St. Pancras Way or Granary Street. Significant solar glare effects are anticipated to be unlikely. A summary of solar glare effects and design response will be provided within the planning application.

The Lighting Strategy has been designed to ensure good quality artificial lighting, with specialist feature lighting in key areas. The impact of any light spill on the neighbouring RPG has been minimised in line with best practice guidance set out by the Bat Conservation Trust and Institute of Lighting Professionals.



The effects of the Development are considered to be limited and not significant in EIA terms. Further assessment will be carried out for daylight, sunlight and overshadowing and a standalone Daylight, Sunlight and Overshadowing Report will be submitted with the planning application. A Lighting Strategy will also be submitted. This process of further assessment will consider nearby emerging development schemes. On this basis, it is anticipated that the Development is not likely to give rise to significant effects either standalone or in-combination.

## **I. Risk of Major Accidents and Disasters**

There are no Control of Major Accidents Hazards (COMAH) registered activities within or close to the Site. Construction of the Development will be undertaken in accordance with current health and safety regulations and guidance, to minimise the risk of accidents. The operation of the Development will not include the use of particularly hazardous substances or technologies, other than some clinical waste. The management of clinical waste from the new C&I NHS Trust headquarters will be undertaken in accordance with relevant guidance<sup>19</sup> and disposed of in a similar method as currently managed by existing healthcare uses on-site. Therefore, the risk of a major accident or disaster is not considered to be significant.

## **m. Climate Change**

The Development will not give rise to significant emissions of greenhouse gases associated with an uplift in road traffic or with the operations of the Site or the operations of the Development. The Development will incorporate appropriate climate change adaptation measures designed to address the potential risks associated with climate change, including allowance for storm events in drainage design, use of durable materials, solar shading and glazing to avoid overheating.

The Development will retain and refurbish existing heritage assets on-site, including the South, East and West Wings, the Gate House, the Residence Building, the River Crisis Centre and the Well. There will be a saving in embodied carbon associated with a refurbishment scenario compared to a complete demolition and new build scenario. The Applicant will adopt a circular economy approach which follows the understanding that the longer a building and its components parts last, the less embodied carbon is expended over the life of the building.

The Development will seek a Net Zero Carbon approach which will minimise carbon as far as possible to meet ambitious targets for all new elements of the Development. The Applicant will minimise carbon emissions from any other parts of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions. The whole life-cycle carbon emissions will be calculated through a Whole Life-Cycle Carbon Assessment and will demonstrate actions to reduce carbon emissions. The Development will target an energy performance certificate (EPC) rating of 'A' (very efficient). The retail floorspace within the chapels of the Development will target a BREEAM 'Excellent' rating with the South, West and East Wing targeting a BREEAM 'Outstanding' rating.

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<sup>19</sup> Department of Health, 2013. Environment and Sustainability. Health Technical Memorandum 07-01: Safe Management of Healthcare Waste.



Overall, no significant increases in greenhouse gas emissions are anticipated as a result of the Development. An Energy Statement, Sustainability Assessment and Circular Economy Statement will be prepared to accompany the planning application.

## Cumulation with Other Development

Table 1 provides a schedule of other approved development schemes (known as 'Cumulative Schemes') which have been identified in proximity to the Site. The locations of the Cumulative Schemes are shown in Figure 4. This list was principally compiled based on the proximity of each scheme to the Site as well as each scheme's scale and massing in consideration of townscape, heritage, views and distance in relation to nearby public transport hubs beyond which material cumulative visual and transport effects (which have the greatest extent of potential cumulative effect) are not considered to occur.

Table 1: Schedule of Cumulative Schemes

Cumulative Scheme and Status	Distance / direction from Site
<p><b>Oriel Scheme (St. Pancras Hospital)</b> (ref: 2020/4825/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 &amp; 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> <p><i>Approved 5<sup>th</sup> August 2022. Construction not yet commenced.</i></p>	<p>Adjacent to the north</p>
<p><b>Ugly Brown Building (also referred to as 'Tribeca')</b> (ref: 2021/2671/P) – Demolition of existing building, and redevelopment to provide a mixed use development comprising a 9 storey building (Plot B) with two basement levels, for use as Class E and Drinking Establishment (Sui Generis), a two-storey Pavilion (Plot C4) for Class E and Drinking Establishment (Sui Generis), along with associated cycle parking, servicing, hard and soft landscaping, public realm, and other ancillary works, alongside amendments to Plot C within Planning Permission 2017/5497/P, namely increase of affordable housing provision in Plot C2.</p> <p><i>Approved November 2022. Construction not yet commenced</i></p>	<p>20m north</p>



Cumulative Scheme and Status	Distance / direction from Site
<p><b>70-86 Royal College Street</b> (ref: 2020/0728/P) – Demolition of existing buildings (Class B2) and erection of 5 storey building (plus rooftop pavilions/plant and basement) to provide a healthcare facility (mixed-use Sui Generis). <i>Approved 3 February 2021. Construction not yet commenced</i></p>	340m north west
<p><b>British Library Extension</b> (ref: ref: 220/1041/P)) – Alterations to existing British Library building including demolition of the existing British Library Centre for Conservation and construction of a new building of up to 12 above-ground storeys and one basement level for use as library, galleries, learning, business and events spaces (Class F1) and retail and commercial spaces (Class E); provision of internal and external public spaces, landscaping and a community garden; improvement works adjacent to Dangoor Walk; provision of cycle and car parking and servicing facilities; provision of Crossrail 2 infrastructure; means of access; and all associated works and infrastructure. <i>Awaiting determination.</i></p>	505m south
<p><b>Belgrove House</b> (ref: 2020/3881/P) – Redevelopment of Belgrove House as a part 5 part 10 storey building plus 2 basement levels for use as office and research and laboratory floorspace; with café, flexible retail and office floorspace at ground floor; an auditorium at basement; incorporating step free entrance to Kings Cross Underground station in place of two entrance boxes along Euston Road; together with terraces at fourth and fifth floor levels, servicing, cycle storage and facilities, refuse storage and other ancillary and associated works. <i>Approved 1<sup>st</sup> November 2021. Construction not yet commenced</i></p>	805m south east
<p><b>Royal National Throat, Nose and Ear Hospital Site</b> (ref. 2020/5593/P) - Redevelopment of the former Royal National Throat, Nose and Ear Hospital site, comprising: Retention of 330 Gray's Inn Road and a two storey extension above for use as hotel (5 above ground storeys in total), demolition of all other buildings, the erection of a part 13 part 9 storey building plus upper and lower ground floors (maximum height of 15 storeys) for use as a hotel (including a cafe and restaurant); covered courtyard; external terraces; erection of a 7 storey building plus upper and lower ground floors (maximum height of 9 storeys) for use as office together with terraces; erection of a 10 storey building plus upper and lower ground floors (maximum height of 12 storeys) for use as residential on Wicklow Street and office space at lower ground and basement floors; erection of a 5 storey building plus upper and lower ground floors (maximum height of 7 storeys) for use as residential on Swinton Street and associated residential amenity space; together with a gymnasium; new basement; rooftop and basement plant; servicing; cycle storage and facilities; refuse storage; landscaping and other ancillary and associated works.</p>	1.08km south east



## Cumulative Scheme and Status

Distance /  
direction  
from Site

*Approved 20<sup>th</sup> July 2022. Construction not yet commenced.*

The nature, scale and use of the Development is such that, when considered in cumulation with the other approved developments outlined in Table 1, the effects are unlikely to be significant. In the absence of mitigation there would otherwise be the potential for cumulative effects from construction works relating to traffic, air quality, noise, biodiversity, land quality and flood risk, should these works overlap. However, such effects would be of a temporary nature and will be managed to an acceptable level through standard widely applied good practice environmental management measures as part of a CEMP for each scheme. Significant cumulative effects related to construction would therefore not occur.

With respect to the potential for cumulative traffic effects, the Development and the cumulative schemes in Table 1 are well served by the existing local strategic road network, which is suitable for HGVs during construction. In addition, appropriate operational assessment of transport and access for the aforementioned schemes would have been undertaken in line with LB Camden's planning application requirements to ensure sufficient capacity on the existing local strategic road network and incorporate any mitigation measures, where required. A number of the emerging schemes, including the Oriel Scheme and Ugly Brown Building are 'car free' schemes with only blue badge parking provided. As part of the Ugly Brown Building scheme, a new pedestrian and cycle bridge is proposed over the Grand Union Canal just to the north of the Site ('Tribeca Bridge') which will link Granary Street and Camley Street. This will increase accessibility to the Site and encourage active travel. No significant in-combination effects with respect to traffic and transport are therefore anticipated.

The Development's massing and design is in keeping with typical urban city centre developments and the emerging development in the surrounding area. The Oriel Scheme's planning application considered the future development of the remainder of the St. Pancras Hospital Site, (i.e. the Development) within its design by submitting 'Illustrative Parameter Plans' which included the Development's Blocks, broadly in line with the design proposals. The assessments that accompanied the planning application for the Oriel Scheme considered the future development of the Site. Both developments are being brought forward collaboratively to ensure the designs are sympathetic to one another.

As such, it is considered unlikely that the completed Development will result in significant effects in cumulation with other developments.

In-combination, the planned development for the Site and surrounding area would bring beneficial cumulative effects with respect to housing and employment delivery. Whilst there is potential for adverse cumulative effects, these would be appropriately mitigated through strategies agreed as part of each application, where required. Overall, it is considered unlikely that there would be significant effects of the cumulative schemes in-combination with the Development.