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Dear Sir/Madam,

**Community Right to Build Order  
Site at Phoenix Place (South), London EC1**

Mount Pleasant Neighbourhood Forum submitted a proposed Community Right to Build Order (CRTBO) to the London Borough of Camden on 24<sup>th</sup> November 2016 under regulation 22 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The proposed Order seeks permission for the redevelopment of the above site (1.2 hectares in area) to provide a development of 5 linked building blocks (Blocks 1 to 5) ranging from 4 to 8 storeys in height (plus lower ground level) and including the following:

- 125 residential units including 19 x 1-bedroom, 69 x 2-bedroom and 37 x 3-bedroom units;
- 38 affordable dwellings (30.4% - housed within Block 1);
- Approximately 1,200sqm of commercial/retail/community space;
- Over 900sqm of communal open space;
- Widening of the western end of Mount Pleasant to create a new 'pocket' park adjacent to Christopher Hatton Primary School including traffic calming measures along the section of road fronting the site;
- The provision of 6 disabled car parking spaces located on Gough Street and Phoenix Place for residents and Mount Pleasant visitors; and
- A minimum of 242 long stay cycle parking spaces and 16 short stay cycle parking spaces.

The London Borough of Camden provides the following comments and suggested conditions to the Examiner in relation to the submitted CRTBO. The Council has considered the proposal against local, London wide and national planning policies. Where relevant, the Council has identified matters where a planning condition should be attached to the Order.

There are a number of matters which, for a planning application, the Council would secure through a Section 106 legal agreement to make a proposal acceptable. As is normal with legal agreements under s106, the Council would require all those with an interest, i.e. a

freehold or leasehold interest, in the land to be a party to the legal agreement with the Council as local planning authority. The Mount Pleasant Neighbourhood Forum (or any organisation linked to the Forum) does not currently hold such an interest in the site and it is therefore not clear to the Council how a s106 legal agreement can be delivered in practice. We have therefore identified this matter in our response to the Examiner for consideration.

The Council welcomes the submission of the proposed Community Right to Build Order by the Mount Pleasant Neighbourhood Forum.

### **Principle of land use**

The principle of replacing the existing sorting office car parking area with a mixed-use development comprising commercial/retail/community space on the ground floor and 125 new residential units on the upper floors is considered acceptable. The principle of commercial/retail/community space on the ground floor is considered to be acceptable and the provision of additional residential floorspace within the Borough is strongly supported by the NPPF, Policy 3.3 of the London Plan, Camden Core Strategy (CS) Policy CS6 and Camden Development Policies (DP) Policy DP2. Policies CS6 and DP2 identify housing as the priority land use for the Borough and highlight the need to maximise the supply of housing.

### **Affordable Housing**

Under London Plan Policies 3.10, 3.11 and 3.12, Camden Core Strategy Policy CS6, Policy DP3 in Camden Development Policies and Camden Planning Guidance (CPG) 2 - Housing, the Council seeks to maximise affordable housing provision with a contribution towards affordable housing being sought in development schemes providing 10 or more units. Policy DP3 states that the Council will negotiate the development of individual sites to seek the maximum reasonable amount of affordable housing and in doing so will take into account the economics and financial viability of the development including any particular costs associated with it.

Policy 3.12 of the London Plan seeks the maximum reasonable amount of affordable housing when negotiating on individual housing schemes but states that the objective is to encourage rather than restrain residential development. Paragraph 173 of the NPPF obliges councils to ensure viability when setting requirements for affordable housing.

#### Quantum of affordable housing

Policy DP3 states that the Council will negotiate the development of individual sites to seek the maximum reasonable amount of affordable housing on the basis of an affordable housing target of 50% of the total addition to housing floorspace, on sites of 50 units of more. The Council, in considering the contribution to affordable housing, will take into account the economics and financial viability of the development including any particular costs associated with it.

The Order is accompanied by a financial viability assessment, which has been submitted in connection with the proposed scheme to justify a lower affordable housing provision on-site. The appraisal provides for on-site delivery of two scenarios: one with 61 affordable housing units (49% affordable housing) and one with 38 affordable housing units (30%

affordable housing provision).

The 49% affordable housing scenario has been identified by the Forum as not being viable. The 30% scenario, however, generates a total profit of 17.49% thus is effectively viable as it is only marginally below the target of 17.50%. The assessment concludes that 30% is the maximum that can reasonably be delivered by the scheme. This appraisal includes a Benchmark Land Value deduction of £56.65m, which has been estimated by Create Streets.

The viability assessment has been independently assessed by a viability expert, BPS, on behalf of the Council. BPS have advised that the proposed construction costs appear reasonable when benchmarked using BCIS indices and are supported by a detail cost schedule, although they have not been provided with an elemental cost plan. Given the stage the scheme is at, it is considered reasonable that there are costs yet to be fully worked up. The cost estimate is lower than BCIS average tender prices for flatted developments, which indicates that these costs are not overstated.

With respect to the sales values applied to the private housing, limited information regarding these units and how their values have been generated has been provided. Only an overall revenue figure has been provided and no indication as to how this figure has been derived. A pricing schedule and a breakdown of the unit mix would have been expected.

Neither a copy of the advice provided by Carter Jonas, nor a pricing schedule has been received nor any discussion taken place regarding how the price estimates have been arrived at. BPS was therefore unable to undertake a more detailed review of these pricing estimates, which creates uncertainty. Nevertheless, based on the market evidence that BPS have researched themselves, it appears that the values applied in the appraisals are at the upper end of those achievable locally, although not fully at the top of the market. This is perhaps to be expected assuming a range of unit values within the scheme. Regarding the non-residential values, BPS confirm that proposed capitalisation yield of 6% is generally realistic given the stage of these proposals. Although this is not a prime location, BPS would expect higher rents to be achievable than £20 per sqft (Retail A1) and £25 per sqft (Restaurant A3). For example, increasing both of these to £30 per sq ft would add £1.30m of revenues (after deduction of additional purchaser's costs).

The site purchase costs are set at 5.5%. This includes Stamp Duty rate of 4%. However, BPS calculate that the latest changes would increase this rate to 4.98%, and increase the purchaser's costs to 6.48%. This would act to worsen the viability position by £700,000. The profit target of 17.5% is a blended rate. No justification or explanation is given for this figure. BPS calculate that by applying a typical profit rate of 22.50% on cost to the private housing, 20% to the retail and 5% to the affordable housing, the blended rate would be 18.0%. BPS is therefore satisfied that the profit target adopted is reasonable and in line with typical levels of return required to incentivise developers.

BPS have created a valuation of the affordable housing in the application, which indicates that the values adopted in the viability submission are reasonable. It is not, however, clear why the viability submission includes 100% of the affordable housing as rented units, when the Council's policy is for a 60:40 split between rented and shared ownership units respectively.

The land value of £57m of the site subject to the Order has been estimated by Create Streets based on comparable land transactions, but no details are provided to show how they have reached this conclusion. BPS are therefore unable to reach a view as to whether Create Streets' valuation approach has adequately reflected NPPG and planning policy in their use of market evidence although the implications of the scheme's proposed delivery suggest that this may not have been adequately complied with. BPS note that this land value is considerably higher (in terms of value per hectare and per residential unit) than the £75m figure that was adopted in Gerald Eve's 2014 viability assessment of the wider Mount Pleasant scheme, therefore this large increase requires further justification.

It should also be noted that both the Council and the Mayor have clearly expressed their preference for an EUV plus approach to establishing value. Given the site is currently in a low value use this should be reflected in the percentage of affordable housing considered deliverable.

In conclusion, BPS considered the costs and values to be broadly reasonable, as whilst they would anticipate purchase costs to be just over £600,000 higher, they would expect approximately £1.3m higher values for the retail unit. The overall change in viability is minimal for a scheme of this size. BPS do however have concerns about the approach adopted to establishing a realistic land value for this site and would expect further justification for this were this a regular planning application made to the Council.

BPS consider that the valuation approach has adequately reflected NPPG and planning policy in the use of market evidence although the implications of the scheme's proposed delivery suggest that this may not have been adequately complied with. BPS note that the land value used is considerably higher (in terms of value per hectare and per residential unit) than the £75m figure that was adopted in Gerald Eve's 2014 viability assessment of the wider Mount Pleasant scheme, and this large increase should be justified further. A copy of BPS' Independent Viability Review is appended to this letter.

### Tenure

Policy CS6 sets a target mix of 60% social-affordable rented and 40% intermediate tenure for affordable housing provision within the borough. The Order complies with this. In the social-affordable rented elements, the Council would like to see all units at target rents given the high land values here. As a minimum, larger units (3-bedroom+) at target rent levels would be sought with smaller units at no more than the Local Housing Allowance cap.

In the intermediate tenure, the Council has significant concerns with regard to the affordability of shared ownership in borough, particularly in a high value area such Mount Pleasant. The Council would therefore encourage alternative models of intermediate – e.g. intermediate rent set at levels that are affordable to those on incomes ideally at CPG2 target levels (£30,000 for 1-bedrooms/£40,000 for 2-bedrooms) but at the least well under the Mayor's Income Caps for intermediate housing. The Order proposes 100% affordable rent, which is welcomed in principle. This should be secured through a S106 legal agreement.

### Unit Mix

Policy DP5 of Camden Development Policies requires that all residential development

provide an appropriate mix of dwelling sizes, with a strong preference for 2-bedroom dwellings and a higher percentage of large (3 bedrooms or more) versus 1-bedroom units. For social-affordable rent, policy DP5 requires 50% larger units in this tenure which reflects housing needs. For intermediate units, the Council would ideally want only smaller unit sizes focused around 1-bedrooms but would also consider studio units and 2-bedroom units aimed at sharers.

The 125 unit proposal would provide an appropriate mix of units (19 x 1-bed units (15%), 69 x 2-bed units (55%) and 37 x 3-bedroom units (30%)) to meet a variety of demands across the Borough in accordance with London Plan Policy 3.8 and Camden Policies CS6 and DP5. In particular, it would respond to the Dwelling Size Priority Table accompanying Policy DP5, which identifies two bedroom market units as being of 'Very High Priority' (the aim is identified at 40% - the scheme meets this at 44.2% provision) and would provide a higher percentage of large family sized units rather than smaller 1-bedroom units.

### **Standard of accommodation and residential amenity**

New development should conform with the minimum space standards set out in Table 3.3 of the London Plan and Camden Planning Guidance 2 - Housing. Policy 3.8 of the London Plan further recognises that a genuine choice of homes should be provided in terms of both tenure and size and provision should also be made for affordable family housing, wheelchair accessible housing and ensure all new housing meets parts M4 (2) and (3) of the Building Regulations. This is reflected in Camden Core Strategy policy CS6 and policies DP6 and DP29 in Camden Development Policies, which seek a diverse range of housing products to provide a range of homes accessible across the spectrum of household incomes and the promotion of inclusive design.

Policy 3.5 of the London Plan also promotes high quality design of housing development that takes into account its physical context, local character, density, tenure, land use mix, and relationship with, and provision for, public, communal and open spaces taking into account the needs of children and older people.

Policies CS5, DP26 and Camden Planning Guidance (CPG) 6 - Amenity also require that the amenity impact on neighbouring properties be fully considered. Policy DP26 seeks to ensure that the amenity of occupiers of neighbouring properties is protected. It states that planning permission will not be granted for development that causes harm to the amenity of occupiers and neighbours in terms of loss of daylight, sunlight, outlook and privacy.

Dwellings should also be designed to provide satisfactory amenity space for future occupiers in accordance with CPG2 and the Mayor's Housing Supplementary Planning Guidance, which recommends that within all new housing developments, where site constraints do not prohibit it, units should have access to private amenity space, such as private landscaped courtyard, private roof terraces and balconies, with a minimum of 5sq.m of private outdoor space for each 1-2 person dwellings and an extra 1sq.m for each additional occupant being provided. This is to be secured as part of a landscaping condition.

Satisfactory outlook and privacy would also need to be provided for future residential occupiers with no undue loss of privacy or overlooking to the detriment of future occupiers of the development. At present, it would appear that in the absence of an area separating the ground floor residential units from the communal landscaped area, access pathways

and proposed commercial units, the proposal would not provide a satisfactory standard of accommodation for future occupiers, with a lack of privacy and potential for undue noise and disturbance from the use of these areas.

The drawings received show only indicative floor layouts. The proposed residential units should be designed to meet the London Plan minimum housing space standards. Further detail on the layout of the proposed residential units, in particular the positioning of all window openings, would be required to fully consider access to daylight and whether acceptable light levels would be provided for future occupiers. A condition requiring plans of all floors to be submitted is considered to be appropriate.

The proposal should maximise the number of dual aspect units on the site. At present, it appears from the floor plans submitted that many of the units would be single aspect. The Council would also seek to secure 10% of the units in the social-affordable rented tenure as wheelchair adapted. These would each require a dedicated parking bay. The Council would seek to secure these details through a s106 legal agreement.

## **Design and Heritage**

The NPPF (paragraphs 17, 56 and 57), the London Plan (Policies 7.1 to 7.8) and Camden's Core Strategy (policies CS14 and CS17), Development Policies (policy DP24) and Camden Planning Guidance 1 (CPG1) - Design place great emphasis on conserving heritage assets in a manner appropriate to their significance and the importance of good design. CS14 requires the highest standards of design. Policy at all levels require buildings, streets and spaces to respond in a manner which promotes inclusive and sustainable development and contributes positively to the relationship between urban and natural environments and the general character of the location.

The NPPF also states that, in determining planning applications where heritage assets are involved, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets, as well as the desirability of new development making a positive contribution to local character and distinctiveness. The London Plan also requires that development affecting heritage assets conserve their significance, by being sympathetic to their form, scale, materials and architectural detail (Policy 7.8). Camden policy DP25 also seeks to protect other heritage assets including Parks and Gardens of Special Historic Interest and London Squares.

Paragraph 129 of the NPPF advises that *“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.”*

Paragraph 132 of the NPPF also advises that: *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable,*

*any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”*

### Local Context

The immediate context is formed by a varied urban grain of larger plot sizes and a finer grain of Georgian terraces. Building heights around the site also vary between 4 and 10 storeys.

The site is not in a conservation area however it is bounded by Hatton Garden Conservation Area to the south and Bloomsbury Conservation Area to the west and north and Rosebery Avenue Conservation Area to the west over the Islington border. The terraces forming Calthorpe Street and Wren Street to the north are Grade II listed. To the south on the opposite side of Mount Pleasant the terrace formed by nos. 46-57 is Grade II listed. The cobbled setts along Gough St have been recommended for the Local List of Non-designated Heritage Assets. Levels differ significantly between the north and south of the site with Calthorpe Street being circa 6 metres above the level of Mount Pleasant Road.

### Site Plan and Layout

The CRTBO proposals adopt a 'U shaped' plan form providing active frontages onto Mount Pleasant, Phoenix Place and Gough Street, around a central courtyard space. The building line would align with the Sorting Office building line and set back at the south western most corner in order to enlarge an area of public open space. Changes to the building line at the south eastern corner are dealt with below under the heading Assessments of Impacts on Heritage Assets. At the south western corner, whilst the principle of the enlargement of the public open space is generally considered to be positive, there may be constraints from a Highway perspective. These are discussed in further detail below.

### Height and Massing

The proposals range from 4 to 6 storeys in height on the Mount Pleasant frontage rising to an 8 storey block on Gough Street and a 7 storey block on Phoenix Place. The overall scale of the development and disposition of height is considered acceptable in relation to the site and its surroundings.

### Architectural Detailing

The indication given through the sketches provided suggest a more traditional style of architecture than the approved scheme. In so far as the proposals are considered to be appropriate to the surrounding context, which has a mix of architectural styles and periods, this approach would be supported by policy DP24 (Securing High Quality Design) in Camden Development Policies which states that *“The Council seeks to encourage outstanding architecture and design, both in contemporary and more traditional styles”* (para. 24.6).

At present, the sketches provided do not appear to match with the plans submitted. In order to ensure that the proposals are developed to a sufficient level of architectural coherence and quality any permission granted should be conditional on the submission of

details of the elevational treatments of each of the facades. This could be secured by condition as suggested below.

### Assessment of Impact on Heritage Assets

The proposed development is in proximity to the grade II listed terrace which sits upon Mount Pleasant, the grade II listed public house which sits upon the corner of Mount Pleasant and Warner Street, and the Hatton Garden Conservation Area which sits opposite the site (and includes the listed buildings).

The public house (The Apple Tree) dates to the mid-19<sup>th</sup> century and is constructed of grey stock brick with stucco dressings, it is of three storeys and has a 3 window range to each roadside elevation, with a two storey projection extending down Warner Street. The cornice to the three storey element is topped by a tall parapet with pierced decoration. The grade II listed terrace (Nos.47-57 Mount Pleasant); is a group of 6 houses and dates to 1720 (although Nos.55 & 57 are believed to have been rebuilt). The terrace is of three storeys with attics and cellars and three window range, constructed from red brick with tiled roofs and dormers. Two have shopfronts to the northern end; and four have mansard roof extensions. Nos. 51, 53 and 55 are finished in white render along with the ground floor of No.57.

The proposed Block 3 (4 storeys) and Block 4 (6 storeys) sit opposite the listed terrace and public house and those blocks along with Block 2 (6 storeys) are being considered in terms of the impact on the Conservation Area.

The proposed development allows for the building height to drop down towards the eastern corner (opposite the listed buildings). The blocks have been designed with traditional character, form, material and detailing; with the top storeys appearing as mansard extensions. There is variance in materials and detailing between and within each block; such as brick, stucco, lead and slate; brick banding, pilasters, brick arched headers to windows, traditional window detailing and deep parapets.

The material change and variation in the architectural language and form are seen to decrease their overall bulk and mass and general dominance in this location. It is acknowledged that the building line of the blocks opposite the listed buildings have been brought forward in comparison to that previously granted under extant planning permission (LPA ref. 2013/3807/P for the wider Mount Pleasant site). However, in light of the other changes (to the height, material and design) it is considered that this change results in minimal harm.

Overall, it is considered that the proposed development submitted has minimal harm to the setting of the Hatton Garden Conservation Area and setting, character and appearance of the listed buildings.

### **Sustainability**

Policy DP22 in Camden Development Policies states that the Council will require development to incorporate sustainable design and construction measures. All developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy (be lean, be clean and be green) to reduce energy consumption. Energy efficient design requires an integrated approach to solar gain,

access to daylight, insulation, thermal materials, ventilation, heating and control systems. These should be considered in relation to each other when designing a scheme. The Council's approach to sustainability set out in Camden Planning Guidance 3 Sustainability should be complied with.

Details of sustainable design and construction measures showing how the development would reduce energy, water and materials have been submitted with the Order in accordance with Council policies CS13, DP22 and DP23. Whilst the information provided is perhaps less detailed than would normally be the case for a development of this nature submitted by way of a planning application, there are positives to the scheme with the following being achieved:

- A commitment to BREEAM 'Excellent' (Score of 70.54%) in the non-residential areas which is in line with current policy requirements and goes beyond the 'Very Good' level of the extant permission. However, the development does not achieve the minimum 60% of total available Water and Energy credits, as expected by policy.
- To demonstrate how sustainable design and construction principles have been followed within the energy and sustainability statement, some detail has been given (though not as detailed in some areas as what the Council would normally expect for a planning application):
  - Meeting water consumption policy requirements for 105 litres/person/day (with 5 litres for external use).
  - A commitment to minimising demolition and construction waste to landfill (90% to be diverted).
  - Meeting the GLA Sustainable Design and Construction SPG requirements for at least three of the main building elements to be A+ - D rated in the green guide to specification. 100% FSC timber and no ozone depleting substances will be used in the construction.
  - The development will be car free, with the exception of 6 on street disabled parking bays. There will be 242 secure cycle parking spaces and 16 short stay cycle parking spaces.
  - No overheating assessment is provided but there is a general commitment to following the cooling hierarchy. No mechanical cooling is proposed. More information needs to be provided on whether overheating is a risk – a dynamic overheating assessment should be undertaken following the CIBSE TM52 methodology in line with the GLA recommendations for current and future climate (CIBSE TM49). This should be secured by condition.

In relation to energy, no modelling has been undertaken so it is not possible to determine whether the Order proposal is meeting policy requirements or not. However there is a commitment to a minimum 35% reduction on site with the remainder (to zero carbon) offset, in line with current policies.

The building fabric specification could be better but it (just) meets building regulations. Air permeability levels are good.

The scheme proposes a 90kw CHP with high efficiency backup gas boilers and thermal stores. The plant room will be future proofed to enable connection to a future network. This is a small CHP system – CHP tends to be suitable only for large-scale mixed use developments (>500 units, or fewer where there's a large non-domestic component to the

plans). Mayor's guidance states *"Due to the small landlord electricity demand, CHP installed to meet the base heat load would require the export of electricity to the grid. However, the administrative burden of managing CHP electricity sales at this small scale where energy service companies (ESCOs) are generally not active, and the low unit price available for small volumes of exported CHP electricity, means it is generally uneconomic for developers to pursue. This can lead to CHP being installed but not operated."* The Council has a checklist of information it requires applicants to provide when CHP is proposed to demonstrate it is suitable for the scheme. It is unclear whether a site wide network has been considered.

No details are provided on renewables proposed. Policies require a 20% reduction from renewables. No modelling has been undertaken or SAP/BRUKL worksheets provided.

In accordance with the sustainability standards set out in Policies CS13 and DP22, it is considered appropriate to secure BREEAM 'Excellent' for the non-residential uses, together with the minimum sub-targets for Energy, Water and Materials through a S106 sustainability plan. It is also considered appropriate to secure an energy efficiency and renewable energy plan through a s106 legal agreement.

### **Air Quality**

Camden policies CS16 and DP32 are relevant with regards to air quality. Policy DP32 requires the submission of air quality assessments for developments that could cause harm to air quality. Mitigation measures are expected in developments located in areas of poor air quality.

The application site lies within an Air Quality Management Area. The Order proposal has not provided any specific modelling for the scheme but has said that the impacts should not differ from (or will be better than) the extant scheme. The scale of construction would be similar. The operational impacts are judged to be slightly better because of the focus on reducing traffic flows and parking, and promoting walking and cycling. There are no new street canyons.

An air quality assessment will need to be undertaken demonstrating that the development is air quality neutral. This would be secured by condition.

### **Flooding**

The proposal seeks to limit surface water run-off to 50% of existing peak 1:1 year storm (this is an 82% reduction of the 1:100 year storm) at 55 l/s, which is in line with policy. A sustainable urban drainage system is proposed together with green roof, attenuation tank and permeable paving. The storage volumes in table 5 of the submitted SuDS Pro-forma do not relate to the storage volumes in table 6. Modelling also does not show the proposed system so it has not really been demonstrated that the system can cope with all storm events up to and including the 1:100 year + CC 6 hour storm. This should be secured by condition.

## **Nature Conservation and Biodiversity**

The proposals do not have any more significant effect on ecology than the extant permission granted.

## **Transport**

Policies DP16, DP17, DP18 in Camden Development Policies and Camden Planning Guidance 7 - Transport are relevant with regards to transport and highways issues.

### Transport Statement

The transport statement submitted in support of the application is very brief and lacking in detail. For example, it provides no detail with regard to travel planning or a servicing strategy for the site. Camden would expect a full transport assessment to be prepared in accordance with policy DP16 and CPG7.

### Royal Mail Group Car Parking

The extant scheme would retain the existing staff car parking spaces in a large basement car park. The Order proposal suggests that the staff spaces would be relocated to the main Royal Mail Group site on the east side of Phoenix Place. It is unclear how this could be achieved without making significant changes to the extant planning permission for the site on the Islington side of the borough boundary. Further details on this issue should be provided.

### Car Parking

The proposed scheme would be car free in accordance with Core Strategy policy CS11, policy DP18 and DP19 in Camden Development Policies, and emerging Local Plan policy T2. This is welcomed as it would encourage and promote trips by sustainable and efficient modes of transport such as walking, cycling and public transport. Car free development should be secured through a S106 legal agreement.

The proposal would require the Council to provide 6 disabled parking spaces on the public highway, directly adjacent to the Gough Street frontage. Generally the Council's preference is to see disabled parking spaces located on-site. However, the proposal would not require the loss of any existing on-street parking spaces. It should therefore be acceptable. However, the Council would need to undertake a separate public consultation exercise if planning permission is granted. The Council would need to secure a financial contribution to cover all associated costs involved in amending traffic management orders and signs. This would be in the region of £5,000. The financial contribution should be secured through a s106 legal agreement.

### Cycle Parking

Policies CS11 and DP18 seek to promote cycling within the borough by improving cycling facilities and increasing the availability of cycle parking. Details of the minimum cycle parking provision expected are contained within Appendix 2 of the Council's Development Policies document.

The proposed scheme would provide high quality cycle parking facilities within the site. This would consist of 242 long stay and 16 short stay spaces. The proposed level of provision for long stay and short stay cycle parking facilities would meet the minimum

requirements of the London Plan. This is welcomed as it would encourage and promote cycling related trips. The proposed facilities also appear to be in accordance with CPG7.

It is unclear if the needs of disabled cyclists have been considered. The Council would look to secure sufficient space within the cycle stores for adaptive cycles in accordance with chapter 6 of the London Plan (refer to paragraph 6A.13 on page 278 of the Minor Alterations to the London Plan 2015). Full details of the cycle parking spaces to be provided would need to be secured by condition.

### Servicing

The proposal does not appear to discuss a strategy for servicing. The Council would generally expect a development of this scale to have on-site servicing facilities (e.g. loading bays within the site). It is assumed that all servicing activity would take place from the public highway directly adjacent to the Gough Street, Mount Pleasant and Phoenix Place frontages. A Delivery and Servicing Management Plan setting out these details should be secured by a s106 legal agreement.

### Travel Planning

Transport for London travel planning guidance indicates that a travel plan should be prepared for a development of this scale. This would encourage and promote trips by sustainable and efficient modes of transport such as walking, cycling and public transport. A Travel Plan and associated monitoring contribution of £6,122 would need to be secured through a s106 legal agreement.

### Construction Management

Policy DP20 in Camden Development Policies states that Construction Management Plans should be secured to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). Development Policy DP21 relates to how a development is connected to the highway network. For some developments this may require control over how the development is implemented (including demolition and construction) through a Construction Management Plan (CMP).

A draft CMP has been submitted in support of the Order. This provides some useful information and follows the Council's approved format. However, it lacks detail as a principal contractor has yet to be appointed.

The site is located on a Cycle Superhighway (Phoenix Place). In addition, various schools are located nearby. This part of the borough suffers from severe traffic congestion during peak periods. The Council's primary concern is public safety but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality, temporary loss of parking, etc.). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. A detailed CMP should therefore be secured via a s106 legal agreement.

In order to minimise traffic congestion and road safety issues during development works, construction vehicle movements would need to be scheduled to take place between 0930 and 1500 hours and between 0800 and 1300 hours on Saturday during school term

time. During school holidays, construction vehicle movements could be scheduled to take place between 0930 and 1630 hours and between 0800 and 1300 hours on Saturday. Specific details would need to be agreed with the Council during development of the CMP. The CMP would need to be approved by the Council prior to any works commencing on site.

The development should also be registered with the Considerate Constructors' Scheme. Details are available at <https://www.ccscheme.org.uk/>

The proposed development would require significant input from Council officers. This would relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the CMP during demolition and construction. A CMP Implementation Support Contribution of £50,000 would also need to be secured through a S106 legal agreement.

#### Basement Excavations Adjacent to the Public Highway

The proposal would involve basement excavations directly adjacent to the public highway. The Council has to ensure that the stability of the public highway adjacent to the site is not compromised by the proposed basement excavations. The applicant would be required to submit an 'Approval in Principle' (AIP) report to the Council's Highways Structures & Bridges Team within Engineering Services as a pre-commencement obligation. This is a requirement of British Standard BD2/12. The AIP would need to include structural details and calculations to demonstrate that the proposed development would not affect the stability of the public highway adjacent to the site. The AIP would also need to include an explanation of any mitigation measures which might be required. The AIP and an associated assessment fee of £1,800 would need to be secured by way of S106 legal agreement.

#### Highways and Public Realm Improvements

Policy DP21 states that '*The Council will expect works affecting Highways to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces following development*'.

The proposal would most likely lead to significant levels of damage to the public highway directly adjacent to the site on Gough Street, Mount Pleasant and Phoenix Place. The Council would need to repair any such damage. In addition, the Council would also need to undertake highway works in order to facilitate the proposal. The highway works would also ensure that the proposed development interfaces seamlessly with the adjacent public highway.

The highway works required to facilitate the proposal and to repair any damage caused to the public highway as a direct result of the proposal would include:

- Removal of the existing vehicular access and a redundant vehicular crossover;
- Enhancements to street furniture (e.g. lamp columns, sign posts and plates);
- Removal of any redundant street furniture (e.g. sign posts and plates, guard railing);  
and
- Repaving of the footway (and possibly the carriageway).

The highway works described above relate to land within the public highway and would be

designed and constructed by the Council. A cost estimate would be prepared by the Council's Transport Design Team. A highways contribution should therefore be secured by way of a S106 legal agreement or alternative mechanism.

The application proposes significant public realm improvements in the general vicinity of the site. This would include a major horizontal realignment of Mount Pleasant directly adjacent to the site which would then allow the construction of a pocket park on the south side of Mount Pleasant at the junction with Elm Street and Gough Street. These proposals would transform the public realm, making it more attractive for people who live and work in the local area.

The public realm proposals would require a significant amount of private land to be adopted by the Council (Section 38 of the Highways Act). This would then need to be maintained by the Council. A stopping up order would also need to be processed prior to any permanent works commencing on this part of the site (Section 247 of the Town and Country Planning Act). The applicant would need to submit the necessary application if and when permission is granted. It should be noted that the costs involved are in the region of £25,000 which would be payable by the applicant.

While the Council supports the principle of additional open space provision and public realm improvements, it has concerns about the implementation and ongoing maintenance of this element of the proposal. In particular:

- The Council would need to adopt a significant amount of land to facilitate the proposed realignment and widening of the public highway on Mount Pleasant. This would place a considerable ongoing maintenance liability on the Council. This would be unacceptable in the current climate of ongoing budget cuts.
- The proposed realignment and widening of the public highway on Mount Pleasant would require the relocation of public utilities and statutory undertakers plant located underneath the public highway. The costs of such works, not to mention the disruption to the local community, would most likely cost millions of pounds.
- The proposed realignment and widening of the public highway on Mount Pleasant would be detrimental to cyclists as it would introduce a staggered junction. This would mean the route would become less direct. This would be seen to be a backward step for cyclists (i.e. the Council wants to improve conditions for cyclists, not make them worse).

Further consideration of these aspects of the proposal is therefore needed. The Council would be happy to discuss this with the Forum.

### **Basement excavation**

The proposal includes the excavation of a lower ground floor under part of the site. The proposed excavation works and the impact on drainage, flooding, groundwater conditions and structural stability are assessed in respect of policy DP27 in Camden Development Policies and the guidance contained within CPG4 - Basements and Lightwells (but to an extent also Council policies CS5, CS14, DP23, DP25, DP26).

In accordance with policy DP27 and the guidance contained within CPG4 the application is accompanied by an addendum to the Basement Impact Assessment

(BIA) undertaken in connection with the extant planning permission scheme. The BIA has not indicated any concerns with regards to the effects of the proposed basement on the site or the surrounding area. The report concludes that there is no evidence that the basements of the Order proposals will have a negative impact, or a more negative impact than the extant planning permission proposals.

The proposed basement excavation would not cause harm to the built or natural environment or local amenity and does not result in flooding or ground instability, in line with the requirements of Policy DP27. A condition should be attached to ensure that a suitably qualified engineer supervises the site works.

## **Contamination**

The NPPF notes that the planning system should contribute to and enhance the local environment by remediating contaminated land, and that the responsibility for ensuring a safe development rests with the developer.

The application site does not fall within the definition of 'contaminated land' as described in part 2A of the Environmental Protection Act 1990, and consequently there are no significant contamination risks associated with the proposed development.

An investigation of the site has not been undertaken. As such, it is considered appropriate that there is a condition securing a ground investigation programme 28 days ahead of works starting on site.

## **Construction**

The proposed development is large enough to generate significant local economic benefits. Policy CS19 and Camden Planning Guidance 8 - Planning Obligations state that in the case of such developments the Council will seek to secure employment and training opportunities for local residents and opportunities for businesses based in the borough to secure contracts to provide goods and services.

In line with CPG8, a range of training and employment benefits should be secured in order to provide opportunities during and after the construction phase for local residents and businesses. This package of recruitment, apprenticeship and procurement measures should be secured by S106 legal agreement and would include the following elements:

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs as per clause 8.28 of CPG8.
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- The applicant should provide a specified number (to be agreed) of construction or non-construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre.
- If the build costs of the scheme exceed £3 million the applicant must recruit 1 construction or non-construction apprentice per £3million of build costs and pay the council a support fee of £1,700 per apprentice as per clause 8.25 of

CPG8. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre.

- The applicant must sign up to the Camden Local Procurement Code, as per section 8.30 of CPG8.
- The applicant provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site.

## **Conclusion**

The principle of a mixed use development comprising commercial/retail/community space on the ground floor and residential development on the site is strongly supported within this sustainable location close to local services and amenities. The development would provide an appropriate mix of dwelling sizes and should be designed to meet the minimum space standards set out in the national technical space standards. The units should also all benefit from external amenity space to meet the London Plan standards for amenity space.

The lower 30% affordable housing provision proposed as opposed to the 50% normally required by policy, has been justified in a financial appraisal accompanying the Order. The viability assessment has been independently assessed by a viability expert (BPS) for the Council.

The Order proposes 100% affordable rent and an appropriate mix of units to meet a variety of demands across the Borough in accordance with London Plan and Camden policy, which is welcomed in principle. In the social-affordable rented elements, the Council would like to see all units at target rents given the high land values here. As a minimum, larger units at target rent levels are sought with smaller units at no more than the Local Housing Allowance cap. In the intermediate tenure, the would encourage intermediate rent set at levels that are affordable to those on incomes ideally at CPG2 target levels (£30,000 for 1-bedrooms/£40,000 for 2-bedrooms) but at the least well under the Mayor's Income Caps for intermediate housing.

The dwellings should be designed to provide satisfactory amenity space for future occupiers in accordance with CPG2 and the Mayor's Housing Supplementary Planning Guidance. Satisfactory outlook and privacy would also need to be provided for future residential occupiers with no undue loss of privacy or overlooking to the detriment of future occupiers of the development. The proposed residential units should be designed to meet the London Plan minimum space standards. The proposal should also maximise the number of dual aspect units on the site and 10% of the units in the social-affordable rented tenure should be wheelchair adapted.

The proposed mass and design of the development would sit comfortably with nearby listed buildings. The overall scale and height of the proposal is considered to be acceptable and would not appear overly dominant within the street scene sitting comfortably with surrounding properties. Its design and the use of high quality materials and detailing to be secured by condition will allow the overall concept to be successfully achieved and overall the proposal would respect the character of the surrounding area.

In line with the Council's policies the development would be car free with the exception of 6 disabled parking spaces on the public highway, directly adjacent to the Gough Street frontage and an appropriate level of cycle parking would be provided.

The application proposes significant public realm improvements in the general vicinity of the site and a new pocket park. These proposals would transform the public realm, making it more attractive for people who live and work in the local area. However, the public realm proposals would require a significant amount of private land to be adopted and maintained by the Council, as well as the relocation of utilities and statutory undertakers' plant. While the Council supports the principle of additional open space provision and public realm improvements, it has concerns about the implementation and ongoing maintenance of this element of the proposal. Further consideration of these aspects is therefore needed and the Council would be happy to discuss this with the Forum.

### **Planning obligations**

This response has identified a number of matters that should be secured through a s106 legal agreement to secure the acceptability of the proposed scheme in policy terms. The 'Heads of Terms' for such agreements should include the following matters as per the detail set out above:

- Affordable housing, including a 60:40 social rent / intermediate tenure split and appropriate rent levels for intermediate housing
- Construction/Demolition Management Plan (CMP)
- CMP monitoring contribution of £7,620
- CMP Implementation Support Contribution of £50,000
- Car-free development for all uses.
- Provision of wheelchair accessible units (10%) in accordance with Building Regulations Part M4 (3) adaptable.
- Local employment, skills and local supply plan setting including apprentices and associated support fee
- BREEAM 'Excellent' for the non-residential units
- Energy efficiency and renewable energy plan
- Highways and public realm contribution (TBC) and levels plans
- Financial contribution of £5,000 for amendments to traffic management orders (for 6 disabled parking bays)
- Travel plan and associated monitoring fee of £6,122
- Approval in principle report and associated assessment fee of £1,800
- Hard and soft landscaping management plan
- Delivery & Service Management Plan
- Public Open Space contribution.
- A commitment to provide 250 square metres of non-residential floor space to a community group at less than market value.

### **Conditions**

The Council recommends that the Order includes the following conditions:

1. The development works hereby granted shall begin no later than four years from the date of the Decision Document issued following the referendum.

Reason: To ensure compliance with Schedule 9, Part 1, Paragraph 61L of the Localism Act 2011.

2. Before the development commences, full details of floorplans, elevations, including doors and windows and shopfronts shall be submitted to and approved in writing by the local planning authority.

Reason: In order to safeguard the character and appearance of the surrounding area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.

3. Sample panels of each of the following shall be provided on site or at an agreed location and shall be approved in writing by the local planning authority before the relevant parts of the works are commenced:
  - a) Typical brick panel (minimum 2m x 2m in size) of each brick type including window reveals showing the colour, texture, face-bond and pointingThe approved panels shall be retained on location until the work has been completed.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policies DP24 and DP25 of the London Borough of Camden Local Development Framework Development Policies.

4. Before the development (other than site clearance and preparation, relocation of services, utilities and public infrastructure and demolition) commences, details of secure and covered cycle storage area for 242 long stay and 16 short stay cycle parking spaces shall be submitted to and approved by the local planning authority. The approved storage areas shall be provided in their entirety prior to the first occupation of any of the new units, and permanently retained thereafter.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policy DP17 of the London Borough of Camden Local Development Framework Development Policies.

5. The development hereby approved shall not commence until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, approve and monitor the critical elements of both permanent and temporary basement construction works throughout their duration to ensure compliance with the design which has been checked and approved by a building control body. Details of the appointment and the appointee's responsibilities shall be submitted to and approved in writing by the Council prior to the commencement of development. Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.

Reason: To safeguard the appearance and structural stability of neighbouring buildings and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Development Policies and policy DP27 of the London Borough of Camden Local Development Framework Development Policies.

6. No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or man-safe rails shall be fixed or installed on the external face of any of the buildings.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.

7. No development (other than site clearance and preparation, relocation of services, utilities and public infrastructure and demolition), shall take place until full details of hard and soft landscaping and means of enclosure of all un-built, open areas (including terraces, balconies and green roofs) have been submitted to and approved by the local planning authority in writing. Details shall include a phased programme of works. The relevant part of the works shall not be carried out otherwise than in accordance with the details and programme thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policy CS14 and policy CS15 of the London Borough of Camden Local Development Framework Core Strategy and policies DP24 and DP25 of the London Borough of Camden Local Development Framework Development Policies.

8. All hard and soft landscaping works shall be carried out in accordance with the approved landscape details by not later than the end of the planting season following completion of the development or any phase of the development, prior to the occupation for the permitted use of the development or any phase of the development, whichever is the sooner. Any trees or areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.

Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policy CS14 & CS15 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.

9. Full details of the green roof hereby approved shall be provided prior to the first occupation of the development in accordance with the approved details and shall be permanently retained and maintained thereafter.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies CS13, CS15 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.

10. Noise levels at a point 1 metre external to sensitive facades shall be at least 5dB(A) less than the existing background measurement (LA90), expressed in dB(A) when all plant/equipment (or any part of it) is in operation unless the plant/equipment hereby permitted will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps), then the noise levels from that piece of plant/equipment at any sensitive façade shall be at least 10dB(A) below the LA90, expressed in dB(A).

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies.

11. At least 28 days before development commences (other than site clearance & preparation, relocation of services, utilities and public infrastructure, but prior to removal of any soil from the site):
- a) a written programme of ground investigation for the presence of soil and groundwater contamination and landfill gas shall be submitted to and approved by the local planning authority in writing; and
  - b) following the approval detailed in paragraph (a), an investigation shall be carried out in accordance with the approved programme and the results and a written scheme of remediation measures shall be submitted to and approved by the local planning authority in writing.

The remediation measures shall be implemented strictly in accordance with the approved scheme and a written report detailing the remediation shall be submitted to and approved by the local planning authority in writing prior to occupation.

Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.

12. Prior to occupation of the development the refuse and recycling storage facilities intended for its occupiers as shown on the drawings hereby approved shall be provided. All refuse and recycling storage facilities shall be permanently maintained and retained thereafter.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policy CS18 of the London Borough of Camden LDF Core Strategy and DP26 of the London Borough of Camden LDF Development Policies.

13. Prior to occupation of the development full details of the following shall be submitted to and approved in writing by the Local Planning Authority:
- a) Affordable Housing refuse store
  - b) Affordable Housing cycle store
  - c) Market units refuse stores
  - d) Market units cycle store

The relevant part of the development shall then be carried out only in accordance with the approved details and samples.

Reason: To ensure the development provides adequate refuse and cycle parking facilities in accordance with the requirements of policies CS11 and CS18 of the London Borough of Camden Local Development Framework Core Strategy and policies DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.

14. All units hereby approved shall be designed and constructed in accordance with Building Regulations Part M4 (2).

Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policy CS6 of the London Borough of Camden Local Development Framework Core Strategy and policy DP6 of the London Borough of Camden Local Development Framework Development Policies.

15. Prior to commencement, detailed plans showing the location and extent of any photovoltaic cells to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CS13 of the London Borough of Camden Local Development Framework Core Strategy and policy DP22 of the London Borough of Camden Local Development Framework Development Policies.

16. Prior to commencement of any development other than site clearance & preparation details of the feasibility of rainwater recycling proposals should be submitted to the local planning authority and approved in writing. The development shall thereafter be constructed in accordance with the approved details.

Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CS13 (Tackling climate change through promoting higher environmental standards), DP22 (Promoting sustainable design and construction) and DP23 (Water) of the London Borough of Camden Local Development Framework Core Strategy.

17. Air quality monitoring should be implemented on site. No development shall take place until full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they have been installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance and have been in place for 3 months prior to the proposed implementation date. The monitors shall be retained and maintained on site for the duration of the development in accordance with the details thus approved.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies CS5 (Managing the impact of growth and development) and CS16 (Improving Camden's health and wellbeing) of the London Borough of Camden Local Development Framework Core Strategy and policies DP32 (Air quality and Camden's Clear Zone)

18. Prior to commencement of the development, full details of the sustainable drainage system shall be submitted to and approved in writing by the local planning authority. Such a system should be designed to accommodate all storms up to and including a 1:100 year storm with a 30% provision for climate change, such that flooding does not occur in any part of a building or in any utility plant susceptible to water, and to achieve 50% reduction in run off (targeting a maximum of 14 l/s run-off in all storm events up to and including the 1 in 100 year 6 hour storm). The system shall thereafter be retained and maintained in accordance with the approved maintenance plan.

Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CS13 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.

19. Prior to occupation, evidence that the Sustainable Drainage Strategy has been implemented in accordance with the approved details as part of the development shall be submitted to the Local Authority and approved in writing. The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan.

Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CS13 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.

20. No demolition/development shall take place/commence until a programme of archaeological work including a Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing as recommended by the Archaeological Statement. The scheme shall include an assessment of significance and research questions; and:

- a) The programme and methodology of site investigation and recording;
- b) The programme for post investigation assessment;
- c) Provision to be made for analysis of the site investigation and recording;
- d) Provision to be made for publication and dissemination of the analysis and records of the site investigation;
- e) Provision to be made for archive deposition of the analysis and records of the site investigation; and
- f) Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

Reason: Important archaeological remains may exist on this site. Accordingly the Council wishes to secure the provision of archaeological investigation and the subsequent recording of the remains prior to development in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP25 of the London Borough of Camden Local Development Framework Development Policies.

21. Prior to the occupation of the non-residential floor space, full details of the location and specification of any extract ducting must be submitted and approved with the local planning authority and development must proceed in accordance with an approved strategy.

Reason: To safeguard the amenities of the future occupants of the development in accordance with the requirements of policy CS6 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies.

22. Prior to the installation of any plant and ventilation equipment hereby approved, full details of a scheme for acoustic isolation and anti-vibration measure, including manufacturer specifications, noise levels and attenuation, shall be submitted to and approved by the Local Planning Authority in writing. Installation shall not precede other than in complete accordance with such scheme as has been approved. All such measures shall be retained and maintained in accordance with the manufacturers' recommendations.

Reason: To safeguard the amenities of the future occupants of the development in accordance with the requirements of policy CS6 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies.

Should any further information or clarification of the above be required, please do not hesitate to contact me on 020 7974 1573 or my colleague Michael Cassidy (Principal Planning Officer) on tel: 020 7974 5666 and email: michael.cassidy@camden.gov.uk

Yours faithfully,

Ben Vickers  
Planning Policy Officer  
Regeneration and Planning  
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26 January 2017

Dear Sir/Madam,

### **Community Right to Build Order at Phoenix Place (South), EC1A 1BB**

The London Borough of Islington (LBI) provides the following comments to be considered by the Examiner in relation to the submitted Community Right to Build Order (CRtBO).

Although the site outline for the proposed Community Right to Build Order (CRtBO) is within the Borough of Camden, given its location on the border of Islington and that it makes up part of the wider Mount Pleasant Sorting Office site that crosses the borough boundary, Islington retains an interest in these proposals. Consistent with legislation any future development associated with the CRtBO should be in general conformity with local planning policies. We have therefore focused our response on the issues of greatest relevance to and impact on local policies taking into account the CRtBO and the relationship of this to future development on the rest of the site.

#### **Affordable housing and viability**

A key issue of strategic interest is affordable housing. Islington and Camden Council's objected to the affordable housing offer for the original Royal Mail application for whole of the sorting office site (LBI reference P2013/1423/FUL) on the basis that this was not deemed to be the maximum reasonable amount taking into account borough targets and that this was not adequately substantiated by viability evidence. The decision to approve the application was made by the previous Mayor of London (Boris Johnson) following the call-in of the application. Having reviewed the supporting documentation for the Community Right to Build Order LBI has a number of points to make about the approach taken to affordable housing and viability.

There is a lack of clarity about the affordable housing offer. Within the *Cover Letter* page 5 states that "The mix of affordable and market units is yet to be determined", however the *Basic Conditions Statement* suggests that the scheme includes the provision of 30% affordable units and that this is based on the maximum possible provision based on the developers commitments outlined in the *Viability Statement*. The assessment of the proposal against Camden's planning policies (Appendix G) however states that the affordable housing offer will be determined depending on the final sale price of the land and reviewed in a later viability appraisal following referendum. It would therefore appear that the affordable housing provision is yet to be determined. For a planning application this would be defined prior to the grant of planning permission and secured through a legal agreement. Whilst it is recognised that the circumstances of the CRtBO are different it will be important for the affordable housing offer to be defined and in some way secured prior to any permission associated with the CRtBO being granted.

The comment that the affordable housing level will be determined depending on the final sale price of the land is of particular concern. This is contrary to Mayoral<sup>1</sup> and borough<sup>2</sup> guidance which identifies the circularity that arises if the purchase price is used as a land value benchmark. Were this to be acceptable the level of proposed affordable housing could be pre-determined by the parties and significantly reduced or removed. Under this scenario the affordable housing would not be determined with reference to any genuine viability constraints, but by the aspirations of the land owner seeking to maximise the value of the site. As BPS, acting for Camden to review the proposal, note this is contrary to the requirement in Planning Practice Guidance that land value should reflect development plan policies, planning obligations and Community Infrastructure Levy charges in all cases.

Furthermore planning viability assessments ignore the specific circumstances of applicants and apply a different set of assumptions to those on which land transactions are based. The risks associated with the use of the purchase price of land have also been identified in guidance and research published by the RICS<sup>3</sup>. This is considered further below.

There is a lack of clarity around the type of affordable units that are to be delivered. The viability statement summarises the units as being rented units, based on Local Housing Allowance (LHA) rents, however it is not clear how this relates to policy requirements for social and intermediate housing. Target rents can be significantly less than LHA levels, particularly for larger units. In 2015-2016, for example, guideline Target Rents for Islington were approximately £142 to £167 per week depending on property size, whereas the LHA rents input into Viability Statement vary between £260-£254. The covering letter states that larger units would be sought at target rent levels although this would not appear to be reflected in the Viability Statement. The inputs into the viability assessment should reflect the costs of affordable housing as required by planning policy.

LBI have concerns about the approach used in the Viability Statement and the extent to which this can be used as robust evidence to inform a future planning permission related to the CRtBO and indeed any future planning applications for the wider site.

As a general point, the Viability Statement lacks a narrative about the information that it has included and how this has been used, including:

- Reference is made to a Create Streets assessment of land value which is used as a “target value”. No information appears to have been provided about the Create Streets assessment and the extent to which this can be considered a robust “target value”.
- It is stated that valuation advice has been provided by Carter Jonas and a separate viability assessment for the wider Royal Mail Group scheme dated August 2015 has been submitted as an appendix. It is not clear in what capacity this was produced and who it was produced for.
- There is limited information about how key assumptions such as sales values have been arrived at.

The Viability Statement models two affordable housing scenarios. One at 30% and one at 50%. The summary of providing 50% affordable housing suggests that a 17.49% developers profit can be delivered alongside a land value of £37,550,000 demonstrating this is technically viable. There has been no consideration of why this is not an acceptable land value particularly given that this is significantly higher than the land value adopted as part of the Mayor’s decision for the whole Mount Pleasant site when considered on a per unit basis. The viability assessment should set out the maximum viable amount; however it seems to place undue weight on achieving a “target land value” rather than assessing the extent to which a policy compliant scheme could be delivered, contrary to national, Mayoral and borough guidance.

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<sup>1</sup> See Mayor’s Housing SPG March 2016 and Draft Affordable Housing and Viability November SPG 2016

<sup>2</sup> See London Borough Viability Protocol November 2016

<sup>3</sup> RICS Guidance Financial Viability in Planning 2012 and

Within this context it is important to revisit the values of the site that were assumed as part of the different viability appraisals undertaken by different parties as part of the original Royal Mail sorting office application. Three main viability appraisals were undertaken which assumed different values as summarised below:

- BPS (on behalf of LBI) suggested a whole site value of £38.4 million
- Gerald Eve (on behalf of Royal Mail Group) suggested a whole site value of £75 million.
- GVA (on behalf of the GLA) suggested a whole site value of £67 million.

Whilst these different assessments varied in their assumptions the land values are all significantly less than those assumed in the *Viability Statement* submitted for the CRtBO given that this is for a small proportion of the wider site and has an estimated site value of £57m. On a per unit basis this is over 4 times the value of the Gerald Eve market value approach taken for the whole Mount Pleasant scheme which was disputed by both councils. The greatly inflated land value is confirmed by the supporting Carter Jonas appraisal for the whole site which suggests acquisition costs of £253 million for the whole site. The Carter Jonas appraisal shows that even taking into account a site value of £253m (which greatly exceeds the land values assumed in the whole site viability assessments) a profit of 38% on cost is generated.

In considering the viability of the CRtBO site it is important to consider the links to the wider sorting office site. The links between the different parts of the wider sorting office site were a key issue in the original application and s106 agreement. It was considered that the whole site viability was impacted by enabling works on Calthorpe Street which affected the affordable housing that was deemed viable across the site. Explicit links were therefore put in place to ensure that Phoenix Place did not come forward in isolation from Calthorpe Street and with lower affordable housing than would have been viable. The enabling works at Calthorpe Street were deemed to be a key element of the overall viability position. This is relevant as it appears the extant permission is relied on to support the assumed land value on the CRtBO site. However, this is now being considered separately and without consideration of Calthorpe Street.

£57 million for the CRtBO site is not considered to be an appropriate land value. It is not clear how this figure can be justified in the context of the previous application and the PPG requirement that land value should reflect policy requirements in all cases.

It is suggested that the Create Streets' estimate on land value was based on comparable schemes in a number of locations across London. However, no information has been provided on these schemes. Furthermore the viability statement acknowledges that due to the size and complexity of the site direct evidence is difficult to find. It would appear that the land value has been based solely on the sale of a site in Vauxhall Nine Elms in Wandsworth. No information has been provided in relation to this site relating to the proposal, transaction or assumptions which underpin this. Similarly, details regarding how this has been adjusted based on site specific circumstances, local policies and affordable housing requirements have not been provided.

The Government's Planning Practice Guidance is clear that in all cases, land values should reflect planning policy requirements, planning obligations and CIL (where applicable). Because the *Viability Statement* does not set out the residual or benchmark values it does not demonstrate that a policy compliant scheme would be unviable and, importantly it does not demonstrate at what amount of affordable housing delivery a scheme becomes unviable.

The London Borough of Islington cannot therefore support the current viability approach to the CRtBO. It sets a land value that is much higher than anything previously established for the site and fails to consider the land value approach endorsed nationally, regionally and locally. We would request that a revised viability appraisal that is consistent with PPG, the Mayor's guidance and the London Borough Viability Protocol is submitted to allow full consideration of the extent to which the CRtBO adequately meets policy requirements in relation to affordable housing. We would be

happy to work with the Mount Pleasant Neighbourhood Forum to ensure that the approach taken is consistent with relevant guidance.

## **Accessible housing**

The *Design and Access Statement* supporting the CRtBO suggests that the 10% wheelchair accessible units will be provided on affordable units, although it is not apparent on the schedule of accommodation which units this applies to or how this requirement applies to the market dwellings. There is however a clear policy requirement for the provision of wheelchair units across all tenures. London plan policy 3.8 (Housing Choice) states that the following approach should be taken towards accessible, adaptable and wheelchair accessible dwellings:

- ninety percent of new housing meets Building Regulation requirement M4 (2) 'accessible and adaptable dwellings'
- ten per cent of new housing meets Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users

Part M4 (3) of the Building Regulations regarding 'wheelchair user dwellings' distinguishes between 'wheelchair accessible' (where the local authority has nomination rights) and 'wheelchair adaptable' (elsewhere). The spatial requirements for each are identical and can be assumed to be roughly 30% greater than their M4(2) equivalents. These requirements should be clearly identified in plan form and in supporting documentation.

## **Wider development**

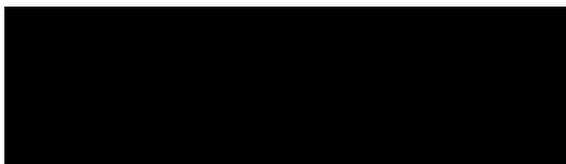
It will be important that any development on the CRtBO site does not compromise development on the site and will be complementary to it – both in land use and design terms, this should include respecting residential amenity.

## **Non-residential uses**

The proposal identifies the provision of 1200m<sup>2</sup> of commercial/retail/community space. It would be useful for this to be defined. The layout plans would appear to offer flexible space across the A1/A3/D1 uses across the ground floor. These uses can vary significantly in their impact and can differ in their design/layout requirements. It would be useful to understand the intended proportions of these uses and the units they are intended to operate in.

If you have any queries regarding the response please do not hesitate to contact me.

Karen Sullivan



Service Director  
Planning and Development

DP4099

24 January 2017

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Camden Council  
Strategic Planning and Implementation  
Regeneration and Planning  
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Dear Ben

## **MOUNT PLEASANT NEIGHBOURHOOD FORUM**

### **COMMUNITY RIGHT TO BUILD ORDER AT PHOENIX PLACE (SOUTH) EC1A 1BB**

We write on behalf of our client Royal Mail Group Limited (RMG) in respect of the above application for the Community Right to Build Order (CRTBO) submitted by the Mount Pleasant Association (MPA).

The site for the CRTBO is on part of the wider Mount Pleasant Sorting Mail Centre site. RMG obtained full planning permission for the comprehensive redevelopment of the Mount Pleasant site in March 2015. The relevant planning permissions are references: 2013/3807/P (London Borough of Camden) and P2013/1423/FUL (London Borough of Islington). The permissions are subject to a shared Section 106 Legal Agreement which links the two sites.

The planning permissions comprise five parcels of development: three on the Calthorpe Street site (London Borough of Islington), one of which comprises the Royal Mail Enabling Works to reengineer the existing mail centre facilities which are required to release land for development; and two on the Phoenix Place site (London Borough of Camden), one of which broadly forms the boundary for the CRTBO.

Over the past 18 months, RMG and its consultant team has worked with both Councils to prepare the site for development. A series of applications to discharge pre-construction conditions relating to the Enabling Works have been submitted to the London Borough of Islington. The intention is to commence the Enabling Works later this year. These are critical to the future redevelopment of the site.

The site is being marketed for sale.

RMG continues to support local involvement in the planning system and positive engagement with community stakeholders. RMG and its representatives have met with the MPA on a number of occasions, most recently on 12 January 2017. We have also previously commented

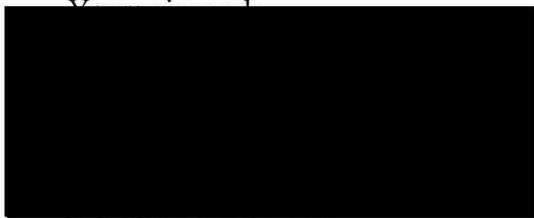
on the proposed Neighbourhood Plan area and the Screening Request for the CRTBO. We have been open and transparent in our aspirations to bring forward the site for development.

Consistent with our letter to the Council in respect of the Screening Request (enclosed), we ask that in assessing the CRTBO thought is given to the following:

- The implications of bringing forward the CRTBO on the planning permissions referred to above;
- The extent to which adequate linkages can be secured for the comprehensive delivery of the two sites;
- The deliverability of the CRTBO given the area concerned is used by RMG for vehicle parking which will need to be re-provided (this re-provision is allowed for in the consented RMG scheme);
- The extent to which the costs and benefits of the comprehensive delivery of the two sites can be secured through separate and standalone CRTBO; and
- The extent to which the CRTBO complies with the Development Plan and supplementary planning guidance, namely the Mount Pleasant SPD.

Please keep me informed on the progress of the CRTBO.

Should you require any further information please contact at the above office.



**HUGH SOWERBY**  
**Director**

Encl: Letter dated 22 November 2016 in respect of the Screening Request ref: 2016/5631/P

DP4099  
22 November 2016

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Dear Michael

**MOUNT PLEASANT SORTING OFFICE: REFERENCE 2016/5631/P**

I write on behalf of our client Royal Mail Group (RMG) in respect of the request for an EIA Screening Opinion in connection with the following development:

*“Provision of 125 residential units including one, two and three-bedroom flats in a series of five linked buildings ranging from four storeys to eight storeys (plus lower ground); approximately 1,200sqm of commercial space; a newly created communal open space over 900sqm in size that will be enclosed by the proposed block on three sides; communal roof terraces private to the residents and accessible by lift; widening of the western end of Mount Pleasant to create a new ‘pocket’ park adjacent to Christopher Hatton Primary School and with traffic calming measures along the section of road fronting the development site; parking, related to relevant accommodation, for disabled drivers to be located on Gough Street and Phoenix Place for residents and Mount Pleasant for visitors; and a minimum of 242 long stay cycle parking spaces and 16 short stay cycle parking spaces.”*

The request was submitted on behalf of the Mount Pleasant Neighbourhood Forum by Maddox Associates and has the following Council Reference: Reference: 2016/5631/P.

As you know, RMG own the principal part of the land subject to this request, in addition to the adjacent land to the north (within the London Borough of Camden) and the land to the east (within the London Borough of Islington).

RMG obtained planning permission for the comprehensive redevelopment of their landholdings in March 2015 references: 2013/3807/P (Camden) and 2013/1423/FUL (Islington). Planning permission was granted following extensive pre-application and post-submission discussions with both Camden and Islington Councils and the Greater London Authority in addition to consultation with the public. Whilst the Mount Pleasant Neighbourhood Forum was established following the grant of planning permission and the Mount Pleasant Association was formed following the submission of the applications, RMG has met with representatives of both groups on several occasions.

You will also be aware that during the course of our pre-application discussions, the Councils jointly adopted the Mount Pleasant SPD which formed the policy framework for the comprehensive delivery of the two sites.

It is important to note that in Page 4 of the letter submitted by Maddox Associates dated 23 September 2016, the penultimate paragraph states the following:

*“Phoenix Place clearly forms only a small part of the wider Royal Mail Sorting office landholding and the proposed development is not intended to be piecemeal development. **The development will be capable of coming forward independently from the Royal Mail Group application without compromising that development.** Alternatively, the long-term objective is to redesign the whole site befitting to the Mount Pleasant Association vision at Phoenix Place. The mechanism for delivering the wider site might be through a Neighbourhood Plan or Neighbourhood Development Order, or both. The comprehensive scheme will complement and incorporate the Phoenix Place development. These wider proposals will of course be so significant in scale that a detailed EIA will be prepared to accompany it. Within that EIA the Phoenix Place scheme will be tested for its environmental effects in the context of the whole scheme and any cumulative nearby developments.”* [My emphasis]

It is simply incorrect to state that the development is capable of coming forward independently from the permitted applications. This is something that we have discussed in detail with representatives from the Mount Pleasant Association and the Mount Pleasant Neighbourhood Forum.

There is an RMG operational need for the two sites to be considered together. The only way to unlock land for development is through the comprehensive redevelopment of both sites alongside extensive enabling works to re-engineer the current mail centre facilities.

These enabling works are located solely within Islington Council. The purpose of the Mount Pleasant SPD was to ensure that the costs of these works were borne across the two sites. Indeed, paragraphs 4.3.40 of the Mount Pleasant SPD states that the Councils are committed to a joint approach with regard to viability and planning obligations. It goes on to say:

*“As a principle, the comprehensive development of the Mount Pleasant site across the two boroughs would be considered as a whole, with costs, benefits and viability assessed accordingly.”*

Clearly this cannot be the case if development comes forward independently.

You will also be aware of the joint Section 106 Agreement for the two planning permissions, signed by both Councils and the GLA. This contains obligations linking the two sites. It was a point of principle to Camden Council that the two sites should not be delivered independently of each other.

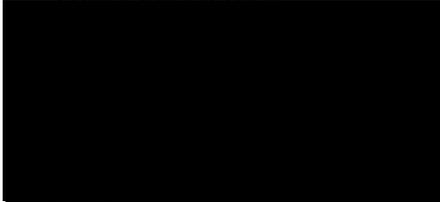
We are concerned that the Mount Pleasant Neighbourhood Forum’s plans do not address the fundamental issue of comprehensive development as set out above.

The Council will be aware of what is commonly called “salami slicing”, where the complete project is split into sub-projects with the results that the section in question is not subject to EIA, but the project as a whole would be. This appears to us to be such an approach.

The Council should consider this when forming a conclusion on the screening request.

Should you require any further information, please contact Hugh Sowerby of this office.

Yours sincerely



**HUGH SOWERBY**  
**Director**



Our ref: 16/3757

**Transport for London**  
Group Planning

Via email only  
[planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

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12th January 2016

Dear Sir / Madam,

## **Community Right to Build Order at Phoenix Place (South), EC1A 1BB**

This letter follows the recent submission of the above Community Right to Build Order, which proposes the development of five linked buildings containing 125 residential units and approximately 1,200 sqm of commercial space. It is understood that the land is in the ownership of Royal Mail Group (RMG), and is currently occupied by a surface level car park used for staff parking at the adjacent sorting office. The site also forms part of a wider development proposal previously submitted by RMG to Camden and Islington councils (LB Camden ref 2013/3807/P) and subsequently approved by the Mayor at a Stage 3 hearing. Broadly, the RMG proposals retained staff car parking on the site but moved it to a basement level, with 345 residential units and ancillary commercial space provided above. This application was supported by a Transport Assessment produced by SKM Colin Buchanan and dated April 2013.

The site is bounded to the east by Phoenix Place, to the west by Gough Street and to the north and south by existing development. Mount Pleasant runs east to west through the southern portion of the site. All these roads are ones for which Camden (and further to the east, Islington) are the highway authority, with the nearest part of the Transport for London Road Network (TLRN) being the A201 Farringdon Road 250m to the north-east. Cycle Superhighway 6 (CS6) currently runs from Elephant and Castle and up Farringdon Street to Stonecutter Street, but later this year will be extended to King's Cross via Phoenix Place.

The site is highly accessible by public transport, with national rail services and Metropolitan, Circle and Hammersmith and City line underground services accessible from Farringdon station 800m to the south-east. Further underground services are accessible at Chancery Lane station (Central line) 750m south of the site and Russell Square (Piccadilly line) 900m west. There are also nine bus routes within walking distance of the site on Grays Inn Road, Clerkenwell Road and Rosebery Square. As such, the site records the highest possible Public Transport Accessibility Level (PTAL) of 6b. There are cycle hire docking stations a short distance to the west of the site on Wren Street and Northington Street.

## **Parking**

The development is proposed to be car free with the exception of six blue badge bays to be provided on street in Gough Street. Given the excellent access to public transport of the site, this is welcomed, although residents should be prevented from applying for parking permits in the surrounding Controlled Parking Zone (CPZ). However, it is also noted that the proposals do not replace staff parking for the adjacent RMG operation. Although not considered a strategic transport issue, this may require further discussion between the applicant, RMG and Camden and Islington councils.

Cycle parking is proposed in accordance with London Plan standards, with long stay parking proposed at basement level. However, from the submitted plans the form of this parking is not clear. TfL would recommend that the cycle parking provision is reviewed against the London Cycle Design Standards, both in terms of access to it and the type of parking itself. Lifts to access cycle parking should be sized appropriately, and cycle parking should be provided in a way that means it is usable with a range of bikes.

### **Access and Servicing**

As no car parking is proposed on site, there is no vehicle access into the basement proposed as part of the development. However, it is therefore uncertain how it is intended to service the site. The Design Statement makes reference to loading bays being provided on Phoenix Place, Mount Pleasant and Gough Street but these are not shown on drawings and it is therefore unclear whether these could impact on the proposed cycle superhighway. This requires further clarification.

As discussed above, it is intended to extend CS6 along Phoenix Place. As highway authority, Camden are leading on the design work for this and should satisfy themselves that the development will not negatively impact on the proposals.

### **Trip Generation and Transport Impact**

The Transport Statement uses the same trip generation methodology as the consented scheme, and whilst TfL would normally expect this to be reviewed as part of a new application to ensure that the data is still relevant, it is accepted that the proposals will result in a lesser transport impact than the RMG consent.

However, a number of measures to mitigate the transport impact of the wider consented scheme were secured as part of the planning process, including a 25 point cycle hire docking station within the site, widening of footways on the western side of Phoenix Place through setting the development back and dedicating the space created as highway, footway reinstatement along Mount Pleasant, bus stop improvements and a financial contribution towards wider pedestrian, cycle and environmental enhancements payable to Camden council. The extent to which this mitigation is relevant to the current proposal needs further discussion, particularly in the context of Camden council adopting their CIL since the determination of the previous application. Any necessary mitigation should be secured via appropriate means.

The proposals are also of a size where any planning application should be supported by a Travel Plan. TfL would expect that a Travel Plan is secured as part of any consent to build on the site, and should include appropriate targets, measures and a monitoring strategy.

### **Construction**

Although a Framework Construction Management Plan has been provided, as no construction manager or contractor has been appointed there is little detail at this stage. As such, production of a detailed plan should be a condition of any consent to build on the site, and be agreed in consultation with TfL. However, it is noted that the preferred route for construction vehicles involves them entering the site from Phoenix Place. Given that this is the route of CS6, which will have been implemented by the time construction could start on site, we would strongly encourage the applicant to use an alternative route.

I hope this information is useful and please get in touch if you want to discuss any of the issues raised in this letter further.

Your sincerely

Mark Day  
**Principal Technical Planner**  
Email: [mark.day@tfl.gov.uk](mailto:mark.day@tfl.gov.uk)  
Phone: 020 3054 7025

Copy to:  
Anne Crane - TfL



Historic England

Planning Department  
Camden Council

Our ref: CLO20036

Your ref:

Telephone 0207- 9733215

Email [sandy.kidd@HistoricEngland.org.uk](mailto:sandy.kidd@HistoricEngland.org.uk)

19 January 2017

Dear Sir/Madam

**Phoenix Place (South), EC1A 1BB  
Proposed Community Right to Build Order**

I am writing with combined comments from Historic England's Development Management Team on built heritage and Greater London Archaeological Advisory Service on archaeology.

**Built Heritage**

In respect to the above ground development proposals, it is our view that this application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

It is not necessary for us to be consulted again on this application. However, if you would like further advice, please contact us to explain your request. We can then let you know if we are able to help further and agree a timetable with you.

**Archaeology**

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.

I have considered the applicant's archaeological statement and broadly agree with its assessment of archaeological interest and the impact of proposed development. Specifically, the construction of basements and installation of piled foundations could impact on:



Historic England, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST

Telephone 020 7973 3700 Facsimile 020 7973 3001

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Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



1. London's English Civil War Defences: map evidence indicates that the defensive ditch and rampart probably ran through the Mount Pleasant area although their precise location and survival is not known.
2. River Fleet: the river has been a managed watercourse for some two thousand years. This development site might contribute to understanding how a stretch of the river only 1km upstream of Roman Londinium and the medieval/post-medieval City of London was influenced by the nearby urban area.
3. Remains of an 18th/19th century brass foundry and cartridge works.

The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. If planning consent is granted paragraph 141 of the NPPF says that applicants should be required to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence publicly available. Whilst some uncertainties remain, on balance I have been satisfied that none of the potential heritage assets are likely to be of national importance and that there is sufficient information on archaeological interest to enable development to proceed with appropriate mitigation measures.

However, as I understand it the process for securing such mitigation under the Neighbourhood Planning (General) Regulations is different from the normal Town & Country Planning Act. Under section 22 of the Regulations there is a requirement in such cases to provide an archaeology statement and for this to establish what that means for the area covered by the order and how it has been taken into account in preparing the order.

The submitted archaeology statement suggests that archaeological work 'could be carried out under the terms of a standard archaeological planning condition' (Mola report paragraph 7.1.4) but this appears to be a misunderstanding of the Regulations which do not include provision for standard planning conditions. Instead this section should set out in sufficient detail what will be done to address matters which would normally be covered by a planning condition.

In this case, I am also in communication with archaeological consultants acting for the site owner (Royal Mail) on a separate planning application with a view to agreeing archaeological mitigation strategies for their Mount Pleasant sites. With respect to Phoenix Place (South) we envisage recording of visible remains of the foundry in addition to a targeted archaeological watching brief on ground reduction for the new basements. The impact of the pile design will also need to be assessed with reference to Historic England's published guidance on the matter to establish whether there is a need for additional mitigation. Provision will also be needed for post-excavation assessment, analysis, reporting and archiving. The details of these measures can be set out in a written scheme of investigation to be agreed by the local planning authority before development commences. However there does need to be a clear and binding undertaking from the scheme promoter to:



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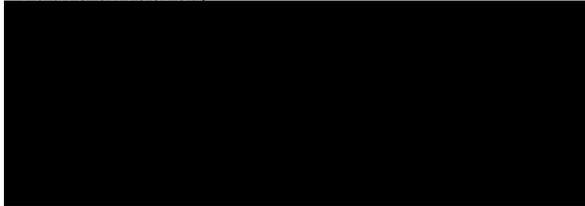
Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.

1. Agree an archaeological written scheme of investigation with the local planning authority before development commences and;
2. Undertake the development in accordance with the agreed written scheme of investigation, including a programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material.

With that safeguard we would have no objection to the Order being granted.

Please do not hesitate to contact me should you require further information. This response relates solely to archaeological issues.

Yours sincerely



Sandy Kidd MA MCIFA MRTPI  
Principal Archaeology Advisor (GLAAS)  
Planning Group: London



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**Department of the Built Environment**

Carolyn Dwyer BEng (Hons), DMS, CMILT, FCIHT  
Director of the Built Environment

Strategic Planning and Implementation  
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**Your ref** n/a

**Date** 13 December 2016

Dear Sir/Madam,

**Community Right to Build Order at Phoenix Place (South), EC1A 1BB**

Redevelopment comprising 125 residential units, 1200 sqm of commercial space and new public open space.

Thank you for consulting the City of London. This letter contains our response to the Community Right to Build Order.

Of relevance to the City is the potential impact of the proposed development on the London Panorama View 2A.1 from Parliament Hill towards St Paul's Cathedral, as identified in the London View Management Framework (LVMF) Supplementary Planning Guidance document and protected by Policies 7.11 and 7.12 of the London Plan. Part of the site falls in the Viewing Corridor (quantitative assessment) and partly in the Wider Setting Consultation Area (qualitative assessment). Our detailed comments are below.

Potential Impact on View 2A.1 of London View Management Framework (LVMF)

Our calculations confirm that the site has a threshold plane ranging between 61.631m (at the southern end of the site) – 62.131m (at the northern end) Above Ordinance Datum (AOD). The relevant heights across the site are not included as part of the submission documentation. The Heritage Assessment, at paragraph 12.6, states: “all Development Scenarios, where visible, would have a negligible likely effect on regional LVMF views”. It is unclear where in the submission documentation that this assessment is substantiated.

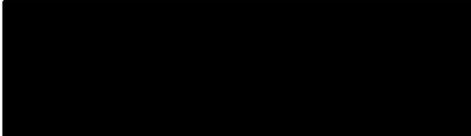
London Plan Policy 7.12 states:

*New development should not harm, and where possible should make a positive contribution to, the characteristics and composition of the strategic views and their landmark elements. It should also preserve or enhance viewers' ability to recognise and appreciate strategically important landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.*

Due consideration should be given to the potential impact on View 2A.1 in accordance with London Plan Policies 7.11 and 7.12 and guidance contained in the London View Management Framework SPG.

Please contact Ben Eley on the above extension if you wish to discuss the matters referred to above.

Yours sincerely,



**Ted Rayment**  
**Assistant Director (Development Management)**

[REDACTED]

---

January 13, 2017

Planning Committee  
London Borough of Camden

Dear Madam/Sir

**Community Right to Build Order at Phoenix Place (South) EC1A 1BB**

As a resident of Rosebery Avenue for the past 11 years, I have been following with close interest the evolving ideas for redevelopment of the Royal Mail's Mount Pleasant site.

Strong opposition from residents in both Camden and Islington to the original Royal Mail proposal for the site has led to creation of the Mount Pleasant Forum and Association and hence to the imaginative and community-friendly plans set out in the Community Right to Build Order application.

I believe the current application offers better provision of affordable housing than the Royal Mail proposal. This is one of London's most urgently-felt needs. This provision will be achieved without the crushing presence of huge tower blocks, out of scale with the surrounding neighbourhood. The proposed maximum height 8-storey maximum height of the proposed development avoids this risk, while the detailed architectural style of the proposal will fit in well with the character of the neighbourhood and its many historic buildings and streets.

No less important is the provision under these plans of more green open space accessible to residents. The Mount Pleasant neighbourhood has little green space at present and this plan will create a welcome addition. In particular, the pocket park will improve amenities for residents, notably children. It will also make a contribution of improving air quality, and will remove a notorious traffic rat-run. Well thought-out pedestrian links through the site will help reinforce the feeling of community and make the area more attractive and accessible to local people.

I welcome also the space allotted in the plan for new retail units. The existence of small, specialist businesses is one of the factors making this part of Camden and of Islington unique in 21st-century London. Not far away Hatton Garden is a thriving survivor from an earlier era, yet in the past decade the area has gained increasing strength from the concentration of newly developed "creative" businesses. The proposal offers a realistic path toward encouraging appropriate economic activity – and with it, social vitality -- back into the area. A healthy local economy, together with improved community facilities, will make our neighbourhood a better place to work, live or go to school.

I urge the Council to accept this application.

Yours sincerely,

Adrian Dicks

Tony & Ann Randall



January 13<sup>th</sup> 2017

To Whom It May Concern regarding:

**Community Right to Build Order at Phoenix Place (South) EC1A 1BB**

We are writing with regards to the above, and would like to make the following points as we are very local to the above and the site is very close to our property:

We are very concerned that there isn't enough community housing (i.e. affordable housing) that the Royal Mail are proposing. So we want better provision of good community housing for local residents.

We do not want to see tower blocks the minute we walk out of our front door or from our windows. The proposed 8-storey height of the development is acceptable and the traditional modern mansion block design will fit in with our neighbourhood.

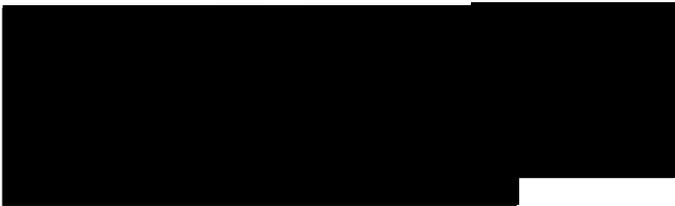
We would like more accessible green open spaces.

We don't think the Royal Mail need parking for employees. This would lead to a better environment and much less traffic congestion.

Retail units would bring life back to the area and help the local community.

Pedestrian links through walkways would bring all the community together and be more accessible.

Ann & Tony Randall



Re. **Community Right to Build Order  
at Phoenix Place (South) EC1A 1BB.**

January 26, 2017.

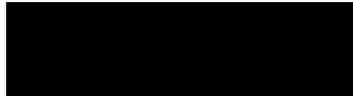
Dr. Miles Hansard

To whom it may concern

I am writing in support of the proposed Community Right to Build Order, at Phoenix Place. I have reviewed the plans, and I believe that the proposed scheme would be both viable and beneficial. In particular, the proposed **green space** and **pedestrian links** would greatly benefit the site. I also believe that the housing and retail provisions are appropriate.

This proposal seems to me to be superior, in all respects, to the existing Royal Mail Group proposal for the same site (which I have studied in detail). I have lived in the area for many years, and it is clear to me that the CRBO proposal is based on a careful understanding of the site, and on a vision of its potential to contribute to the neighbourhood.

Yours faithfully

A solid black rectangular box used to redact the signature of Dr. Miles Hansard.

Dr. Miles Hansard

## Vickers, Ben

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**From:** [REDACTED]  
**Sent:** 10 January 2017 12:48  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South) EC1A 1BB

To whom it may concern,

I am writing in support of the CRtB for Phoenix Place. I have been very impressed with the project, and the level of consultation undertaken to come up with a scheme that the community strongly backs. Even my children, who attend Christopher Hatton Primary School, have been involved in helping to design the public spaces.

The scheme offers many benefits including:

- functional public space
- permeable residential development, designed to encourage ownership and natural surveillance
- a good scale and mass of buildings
- calmed traffic
- locally contextual
- high-quality design

We are very enthusiastic about this project and hope to see it come to fruition in the near future.  
Best regards,  
Alexandra Steed

**Vickers, Ben**

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**From:** [REDACTED]  
**Sent:** [REDACTED]  
**To:** PlanningPolicy  
**Subject:** Royal Mail Mount Pleasant site build

Dear Sirs

Having compared the Royal Mail's proposal with the Mount Pleasant Community Forum's Community Right To Build Order proposal , I wholeheartedly support the MPCF proposal.

Kind regards,  
Andrew Stracey

[REDACTED]  
Sent from my iPad

## Vickers, Ben

---

**From:** Cameron, Andy [REDACTED]  
**Sent:** 11 January 2017 18:49  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South), EC1A 1BB

Dear Sir or Madam,

I am a local resident in Warner Street and I would like to add my comments to the planning proposals by the Community Right to Build Order at Phoenix Place (South), EC1A 1BB.

In particular I am in favour of

- The new public access routes across the site
- The communal open space
- The attempt to make sure the new development is in keeping with the surroundings
- The fact that there are no excessively tall tower blocks
- The mix of residential and commercial space

So I fully support the proposal.

Thank you for your attention.

Yours faithfully  
Andy Cameron

[REDACTED]

[REDACTED] by ABN AMRO Bank N.V., which has its seat at Gustav Mahlerlaan 10 (1082 PP) Amsterdam, the Netherlands, and is registered in the Commercial Register of Amsterdam under number 34334259.

## Vickers, Ben

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**From:** Angela Barrett [REDACTED]  
**Sent:** 24 January 2017 18:42  
**To:** PlanningPolicy  
**Subject:** Mount Pleasant Neighbourhood Forum's C.R.T.B.O.

I would like to express my enthusiastic support for the community plan. It is practical, just, and inclusive and most likely to inspire affection and create the kind of neighbourhood people really want to live in.

Angela Barrett

[REDACTED]

## Vickers, Ben

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**From:** Ann Winchester [REDACTED]  
**Sent:** 18 January 2017  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South) EC1A 1BB

To the Planning Officers for Mount Pleasant:

Dear Sirs,

As I feel that it's *very* important that we all do our best for the future of this area, I am writing to comment on the proposed Community Right to Build at Phoenix Place.

I'd like to register the fact that I am 100% in favour of this beautifully designed and planned proposal - and not at all for the high rise Royal Mail version.

This local design is much more community-friendly, with its retail areas, and much more *proper green space*. On top of that, though being lower-rise, it will actually house more people than the Royal Mail version!

I also really like the look of the mansion block designs, as they'll fit in well with the neighbourhood. The Circle looks like a nice place where you can get to know your neighbours if you wish. (I live in nearby Holsworthy Square, which is around its own large courtyard, and that makes for a friendly sort of community).

I do hope you'll see fit to give this the go-ahead: It is, in my opinion, a wonderful opportunity to make a real "place" of this neglected area - which is now a bleak nowhere land, and the Royal Mail designs would only make bleaker in a different way.

Yours sincerely

Ann Winchester

## Vickers, Ben

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**From:** Avigail Ochert [REDACTED]  
**Sent:** 01 December 2016 14:50  
**To:** PlanningPolicy  
**Subject:** IG acknowledged 2.12 Community Right to Build Order at Phoenix Place (South), EC1A 1BB

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I support the plans by the Mount Pleasant Association to redevelop the site above. I work in Christopher Hatton School and especially favour the development of a pocket park in this densely built up area. I would like cycle and pedestrian safety to be factored into the designs and in particular in relation to delivery to commercial buildings on the site.

Avigail Ochert  
[REDACTED]

**Vickers, Ben**

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**From:** Axel G. Rossberg [REDACTED]  
**Sent:** 20 January 2017  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South) EC1A 1BB

Re: Community Right to Build Order at Phoenix Place (South) EC1A 1BB

I support the Mount Pleasant Forum proposal for this site.

Axel Rossberg  
[REDACTED]

## Vickers, Ben

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**From:** bailey reed <[REDACTED]>  
**Sent:** 08 December 2016 21:46  
**To:** PlanningPolicy  
**Subject:** Community right to build order at Phoenix Place South EC1A 1BB

Dear Sirs,

I wish to register my support for the MPA and there alternative plans to develop the south side of the Mount Pleasant site.

Royal Mail have shown no interest in the local community and there proposal amounts to little more than a private community.

There disregard for the living conditions of current residents and Christopher Hatton School shows there only concern is making money.

The MPA have offered a viable alternative that is sympathetic to the local area whilst still paying a handsome profit to royal mail.

I hope that people can for once be put before profit.

Please grant the right to build order so local people can play an active role in developing our community.

Yours faithfully

Bailey Reed  
[REDACTED]

Sent from my Samsung Galaxy smartphone.

## Vickers, Ben

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**From:** Bridget Unwin [REDACTED]  
**Sent:** 16 January 2017 11:18  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South) EC1A 1BB

Dear Sir/ Madam,

I am a resident of [REDACTED] which leads to the Mount Pleasant site.

I'm writing to you to oppose the Royal Mail's planning proposal and instead support the alternative architectural proposal put forward by Creative Street and the Mount Pleasant Neighborhood Forum. My justification for this endorsement is endorsed below:

- Creative Street solution provides more community housing (including affordable housing) than Royal Mail proposal
- There are no looming tower blocks - the proposed 8-storey height of the development is far more acceptable for residents
- The "traditional" modern mansion block design fits in with neighbourhood and the history of Clerkenwell and the surrounding area
- There are more accessible green open space which is not only aesthetically pleasing, but proven to reduce crime rates
- The pocket park gives focus to SW corner and prevents rat-run. This gives a pleasant ambience to primary school area and helps reduce air pollution issues.
- The Creative Street proposal offers less car-parking than Royal Mail scheme which is better for environment and traffic congestion issues
- The proposed retail units add vitality back into area and community
- The pedestrian links through the site make the development part of the community and making the development site more accessible and more porous.

I hope you will take into account the view of the local people who, understanding the need for the site to be developed and for housing solutions to be offered, feel this can be done so with a greater respect for the community. The Creative Street proposal is more sensitive to the rich history and architecture of the area but still provides a successful solution to housing needs.

Yours sincerely,

Bridget Unwin

**Vickers, Ben**

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**From:** Caroline Roux <[REDACTED]>  
**Sent:** 24 January 2017 11:32  
**To:** PlanningPolicy  
**Subject:** Mount Pleasant/community right to build order.

Dear Planning department

I am writing in support of the Mount Pleasant Association's proposals for the southern portion of the Mount Pleasant Site made under the CRTBO.

I strongly feel that this scheme is appropriate and moreover offers a model for on-going planning decisions in London and the UK.

The scheme takes into account the urban context as well as the need to sustain and expand the community that already exists in this central part of the city.

I have been a resident of [REDACTED] for 17 years, and know the area well. I am also an architecture and design journalist for publications including the Financial times, the Telegraph and the Economist, and I am familiar with issues around urban planning.

I consider the Mount Pleasant Association proposal to be an example of urban development that could be celebrated going forward.

with regards

Caroline Roux

**Vickers, Ben**

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**From:** Jamie Dicks <[REDACTED]>  
**Sent:** 24 January 2017 17:45  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South) EC1A 1BB  
**Attachments:** Community.Right.to.Build letter 01-2017 - CKD.docx

Dear Sir/Madam,

23 January 2017

I am writing to support the proposal of the Community Right to Build plan by Create Streets/Mt Pleasant Forum for the Phoenix Place site.

I have lived in a flat in Rosebery Avenue for nearly 11 years and feel this is the most positive development proposal I have seen in all that time. It is an exciting plan which would contribute to a revitalisation of the area north and west of the existing Royal Mail buildings. In this area there is a shortage of green space and of genuinely affordable housing, both of which are addressed in the Create Streets/Mt Pleasant Forum plan. The proposed pocket park in Elm Street takes a step in the right direction, providing open space which is easily accessible, a lack of which I am sorely aware of when looking after my grandchildren. It would also provide a pleasant stopping place for those heading for the buses on Gray's Inn Road.

The proposed buildings are designed to fit into the architecture of the local neighbourhood, with a maximum height of 8 storeys which is in keeping with local buildings. Time and time again, developments fall into the trap of including high-rise buildings, clad in shiny materials which clash with the predominately brick buildings. Those sort of developments look dated within ten years, whereas the design set out in the Community Right to Build order would create buildings which will become a valued part of this traditional area.

The proposed development is also forward looking in that it discourages car parking and through roads for traffic. This is essential as those of us who live locally are already living in one of the most polluted parts of the country.

The fact that the Community Right to Build plan includes a relatively high proportion of community housing would be welcome to all Londoners. The boroughs of Camden and Islington should do as much as possible to halt developments for only for the highly paid.

The area south of Rosebery Avenue and East of Farringdon Road is already lively and attracts many Londoners on their way home from work as well as appealing to locals. With the right design, this vitality could be extended to the site north of the Royal Mail buildings. At the moment, it is impossible to cross the site where the post office vans are parked so it is effectively a no-go area for locals. The circus design of the broader proposal by Create Streets is very exciting. Having walkways from the corners of the site which cross in the centre of the site would create a cafe atmosphere for locals as well as for visitors. It would draw people into the area and perhaps enable residents to do more local shopping in small retail units.

In contrast, the proposal put forward by the Royal Mail is fortress like, with massive buildings towering above the existing neighbourhood. The design proposed by the Royal Mail would shut out locals and appears to cater only for a transient population.

The scale of the site provides an enormous opportunity for tying the neighbourhoods of Camden, Clerkenwell and King's Cross together. I urge the Council to accept the Community Right to Build application designed by Create Streets.

Yours sincerely,  
Carolyn Dicks



## Vickers, Ben

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**From:** Catherine Cinnamon [REDACTED]  
**Sent:** 10 January 2017 19:02  
**To:** PlanningPolicy  
**Subject:** Mount pleasant community proposal

Dear Sirs

I write as a resident of [REDACTED] and also as Secretary of Calthorpe Street Residents Association and Chair of Mount Pleasant Neighbourhood Forum.

I write to support this community led scheme as an excellent use of the site.

- The proposal provides much needed housing and commercial space in a sympathetic manner, and blends into the existing townscape.
- It fits in with the ethos, scale and tone of the existing ambience, history and architecture and will enhance the community spirit.
- The proposed housing shows a greater housing gain per square foot than does the existing Royal Mail Group proposal for this section of the Royal Mail development site.
- The "mansion block" style of design with inner courtyard and throughway pedestrian access is both modern in finish but traditional in concept, harking back to the design of Holsworthy Square, the Bourne Estate and the Margery Street Estate. This is a very welcome and thoughtful design solution which harmonises with local surroundings
- This design fits in with the local area - unlike the high-rise tower and bulky fortress-like blocks proposed for this spot by Royal Mailj.
- In contrast, this design does not dominate and enclose the area, it does not block light and views; and it allows through-way pedestrian access across the whole site, facilitating local journeys to and from the shops and services at Mount Pleasant and Gray's Inn Road. This project opens up a "dead" area into a human space where people can live, shop, work, walk and sit/hang out/see their friends, without a feeling of enclosure and noise/air pollution.
- The proposed pocket park provides a welcome addition of public open space for residents and school children alike.
- Not only is that proposed green space a much needed social asset; it also will provide help with air pollution (dangerously high in this locality with some recordings of 60+ NO2 pollution).
- The pocket park will also minimise the "rat-run" problems of the Laystall Street/Mount Pleasant/Gough Street junction, which at the moment is in need of traffic calming due to dangerous proximity to the local primary school Christopher Hatton.
- Minimising the "rat run" itself will also help minimise air pollution, as will the planting in the pocket park

Altogether I cannot recommend this project more highly - it is well designed, fit for purpose, and backed consistently by the majority of local residents.

I do hope that you will give this community-led development your unqualified approval.

With best regards

Yours faithfully  
Catherine Cinnamon

Sent from my iPad

## Vickers, Ben

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**From:** Gwenneth Lee [REDACTED]  
**Sent:** 24 January 2017 09:25  
**To:** PlanningPolicy  
**Subject:** Community Right to build order Mount Pleasant

I am writing in support of the Community Right to Build Order proposed by the Mount Pleasant Neighbourhood Forum.

This plan offers many benefits to the local area and its community. As head teacher of Christopher Hatton School, situated in the centre of the proposed planning area we have been fully consulted by the forum - as opposed to the lack of meaningful consultation from the royal Mail Group.

The benefits of the community proposal are:

The plan is lower and less intrusive - it would have a far smaller impact on the light and outlook from the school.

The scheme offers more, desperately needed homes

Most importantly it offers accessible green space, including a pocket park in front of the school.

Christopher Hatton is situated in one of the most polluted areas of London, an unhealthy environment for young children. This problem could be helped by the additional green space, the removal of roads and parking indicated in the community plan.

Finally the plan proposes safer pedestrian routes which are much needed in an area which currently contains a number of dangerous rat runs.

I hope this proposal is given the serious consideration and support it deserves

[REDACTED]  
Christopher Hatton School  
[www.chrishaatton.camden.sch.uk](http://www.chrishaatton.camden.sch.uk)

**Vickers, Ben**

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**From:** Craig Eric Riley [REDACTED]  
**Sent:** 26 January 2017 08:46  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South) EC1A 1BB

Dear Planning Department

As a local resident for many years, I would like to share my thoughts on the community right to buy order at Phoenix Place - for which I fully support.

I was horrified by the re-development proposals for the Mount Pleasant site passed by the Mayor of London back in 2014. They did not address any of the issues or opportunities I felt were important for a new development in our neighbourhood. But I was encouraged to learn of the proposals put forward at the Phoenix Place south site.

The Holiday Inn on the corner of the Farringdon Rd at the north east corner of Mount Pleasant does not represent the general nature and scale of the built environment in the area and seems a poor precedent for the height and quality of the buildings proposed. So it was very welcome to see the right to buy proposal reflecting the community I live in; sympathetic to the existing neighbourhood in many respects.

Best regards  
Craig Riley

## Vickers, Ben

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**From:** Denison, Edward <e.denison@ucl.ac.uk>  
**Sent:** 26 January 2017 15:50  
**To:** PlanningPolicy  
**Subject:** Mount Pleasant Community Right to Build Order - letter of support.

Dear Camden,

This is a short message to express my support for the Mount Pleasant Neighbourhood Forum's (MPNF) Community Right to Build Order (CRtBO).

The proposed Order is the result of nearly four years of extensive engagement with the local community – a process that has far surpassed the extant permission for the site by drawing on the knowledge and experience of those living and working in the local area. It is intrinsically based on the local community's needs and wants, while being grounded in the economic and practical realities confronting this complex site. The desire therefore to create a higher-density development on the site in order to increase the number of affordable homes is one of the basic principles of this scheme and needs to be applauded and supported by local, regional and national governments. This CRtBO is not only the country's largest ever, its underlying principle of delivering as many affordable homes as part of a new and highly desirable place to live and work is outstanding. The MPNF's proactive approach to addressing London's dire housing shortage is something the whole community should be very proud of.

The CRtBO is also attractive in the way it successfully utilises and transforms currently under-utilised public land identified by the local residents and users of the adjacent primary school to create a new pocket-park that will benefit all users, from the permanent and semi-permanent local residents and workers to the transient and ephemeral visitor and passerby. This new 'green' space specifically responds to the acute shortage of open public spaces in this part of south Camden and neighbouring Islington and creates a new and attractive 'destination' that will complement the more 'urban' equivalent of the circus proposed on the adjacent Islington portion of the site.

Our neighbourhood area suffers gravely from a lack of green and high-functioning public spaces and so any concerns the local authority has with respect to funding the maintenance of this space should be taken into context with and measured against the provision of public spaces in other parts of the borough. The landscaping of the park has been carefully considered to keep maintenance costs to a minimum with little need for ongoing maintenance beyond what is already provided by the council on the existing paved area currently used as rodent-infested pigeon lavatory. As a proportion of public expenditure, the high-density residential context of south Camden receives comparatively less benefit from the total cost of maintaining public spaces than residents living in and around the borough's major public spaces such as Regent's Park and Hampstead Heath. When you include also the levels of poverty, deprivation and social exclusion in our area compared with areas that have more than average provision of green spaces, the cost of maintaining this pocket park is not only trivial in comparison to larger spaces in the borough, but also delivers significant benefits that help mitigate other financial burdens in the form of health, happiness and well-being. In short, the actual additional cost of maintaining this proposed park should not be seen in isolation, but instead seen within the wider context of the benefits it will deliver.

The CRtBO must be applauded also for supporting sustainable urban strategies – principally zero-car ownership (except for disabled residents), promotion of walking through planning and architectural design, encouraging healthy lifestyles through the design and landscaping of high-functioning public spaces and pedestrian uses and routes, compatibility with and support of proposed major cycle networks,

the realignment of known rat-runs to reduce and eliminate the detrimental impact of motor-vehicles on the area, commitment to a zero carbon development and use of renewable energy in the long-term, and the intention to achieve the highest BREEAM ratings in design and construction of buildings.

The CRtBO respects and enhances the existing historical context of the area by responding positively to the characteristics of existing structures and streets. For example, the elevation facing the listed terrace containing the Apple Tree pub is deliberately designed to reflect the existing scale and massing. It also re-establishes the original street line that existed when the terrace was built in the 18<sup>th</sup> century. This line angles respectfully away from the listed terrace as it rises in height and elevation towards the newer and substantially larger buildings on Gough Street, namely the massive 'glass box' ITN building by Norman Foster. This very difficult balancing act between the competing requirements and settings of these two very different contexts is one of the CRtBO's special qualities that need to be considered carefully. It is harder to appreciate these qualities on plans or drawings than to observe them on site where the conditions created by the complex topography and existing urban landscape are much more evident.

If Camden Council wants to support its residents in creating attractive, healthy and active places to live and work for decades to come, which cater for all users including society's most vulnerable, then they must support this CRtBO. The extraordinary effort the residents and workers of this area and their supporters have gone to in order to deliver this proposal should be applauded and their proposal must be approved. This CRtBO is a beacon of hope in a world increasingly stripped of public assets and resources and all the things that are needed to create and sustain a civilized society. In its small way, this CRtBO is resisting the steady decline that is undermining our cities and society more broadly. It deserves all the support Camden can muster.

Kind regards,

Edward Denison

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Dr Edward Denison  
**Architectural History and Theory**  
**Director, MA Architecture and Historic Urban Environments (MAHUE)**  
Instagram: [BartlettMAHUE](#)

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Vimeo: [vimeo.com/bartlettarchucl](https://vimeo.com/bartlettarchucl)

## Vickers, Ben

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**From:** Elena Henson <[REDACTED]>  
**Sent:** 26 January 2017 15:31  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South) EC1A 1BB

Dear Sirs

I write in support of the Community Right to Build plans submitted by the Mount Pleasant Association.

I have lived in a flat overlooking this site for over 30 years, my children attended Christopher Hatton Primary school, adjacent to the site. The new plans appear well thought out after extensive consultation with the local community, and fit in well with the surrounding area - unlike the Royal Mail's proposal.

Building heights in the CRtB plans are far more acceptable, while still achieving the same, or more residential units, with a better ratio of affordable housing.  
In particular they spare us the horror of a 15 storey tower on the corner of Gough Street and Mount Pleasant looming over the neighbouring buildings and the school.

Useful pathways and green spaces accessible to the public create a better neighbourhood feel at street level, as opposed to the much commented on "fortress-like" blocks that Royal Mail proposes.

I very much hope that the CRtB plans are accepted

Best regards

Elena Henson

## Vickers, Ben

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**From:** Freddie Unwin [REDACTED]  
**Sent:** 15 January 2017 17:01  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South) EC1A 1BB

Dear Sir/ Madam,

I am a resident of the [REDACTED] which leads to the Mount Pleasant site.

I'm writing to you to oppose the Royal Mail's planning proposal and instead support the alternative architectural proposal put forward by Creative Street and the Mount Pleasant Neighborhood Forum. My justification for this endorsement is endorsed below:

- Creative Street solution provides more community housing (including affordable housing) than Royal Mail proposal
- There are no looming tower blocks - the proposed 8-storey height of the development is far more acceptable for residents
- The "traditional" modern mansion block design fits in with neighbourhood and the history of Clerkenwell and the surrounding area
- There are more accessible green open space which is not only aesthetically pleasing, but proven to reduce crime rates
- The pocket park gives focus to SW corner and prevents rat-run. This gives a pleasant ambience to primary school area and helps reduce air pollution issues.
- The Creative Street proposal offers less car-parking than Royal Mail scheme which is better for environment and traffic congestion issues
- The proposed retail units add vitality back into area and community
- The pedestrian links through the site make the development part of the community and making the development site more accessible and more porous.

I hope you will take into account the view of the local people who, understanding the need for the site to be developed and for housing solutions to be offered, feel this can be done so with a greater respect for the community. The Creative Street proposal is more sensitive to the rich history and architecture of the area but still provides a successful solution to housing needs.

Yours sincerely,

Elfrid

**Elfrid Unwin** | HR Business Partner, EMEA  
Human Resources | Macquarie Group Limited  
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T 44 20 3037 2432 | M +44 7917827968 | [freddie.unwin@macquarie.com](mailto:freddie.unwin@macquarie.com)  
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**Vickers, Ben**

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**From:** Emma [REDACTED]  
**Sent:** 10 January 2017 20:37  
**To:** PlanningPolicy  
**Subject:** Mount pleasant development

Dear planning

Having investigated the plans for the mount pleasant development and compared those proposed by the Royal Mail group and by the community, I would like to voice my strong support in favour of the community proposal. I live in the area and my child goes to Christopher Hatton Primary School so the pocket park, green spaces and pedestrianisation would make an enormous difference to us on a daily basis. If the community proposal were to be implemented it would change our lives significantly for the better. If the RMG proposal were to go ahead, sadly the opposite would happen.

Kind regards  
Emma Rivlin

Michael Cassidy  
London Borough of Camden  
Forward Planning & Projects  
Via Email:  
[planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

**Our ref:** NE/2016/126261/01-L01

**Date:** 20 December 2016

Dear Michael

**Phoenix Place (South), EC1A 1BB**

**Mount Pleasant Neighbourhood Forum. Community Right to Build Order at Phoenix Place (South).**

Thank you for referring the above Community Right to Build Order. We have no objections to proposed development as submitted and provide the following advice:

The site does not lie within an area of medium or high flood risk (flood zone 2 or 3) and lies in flood zone 1 (land assessed as having a less than 1 in 1000 year annual probability of fluvial flooding or low risk). Nor are there any main rivers within or in the vicinity of the site. The surface water drainage assessment submitted with the order will need to be reviewed by the Lead Local Flood Authority to assess the risks and mitigation proposed for any surface water flood risk.

The proposed development site appears to have been the subject of past industrial activity (waste storage) which can pose a high risk of pollution to controlled waters. We recommend that you consult with your Environmental Health / Environmental Protection Department for further advice. Where necessary we would advise that you seek appropriate planning conditions to manage both the risks to human health and controlled waters from contamination at the site. This approach is supported by Paragraph 109 of the National Planning Policy Framework.

We recommend that developers should:

1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
2. Refer to the [Environment Agency Guiding principles for land contamination](#) for the type of information that is required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
3. Refer to the [contaminated land](#) pages on GOV.UK for more information.
4. Refer to the Definition of Waste: Development Industry Code of Practice on the [CL:AIRE](#) website and;
5. The [Environmental regulations](#) page on GOV.UK.

Cont/d..



If you have any questions, please feel free to contact me at [HNL SustainablePlaces@environment-agency.gov.uk](mailto:HNL SustainablePlaces@environment-agency.gov.uk).

Yours sincerely

**Scott Hawkins**  
**Sustainable Places Planning Advisor**

Telephone: 0208 474 8339

E-mail: [HNL SustainablePlaces@environment-agency.gov.uk](mailto:HNL SustainablePlaces@environment-agency.gov.uk)

Address: Environment Agency, Ergon House, Horseferry Road, London SW1P 2AL

## Vickers, Ben

---

**From:** jonny jones [REDACTED]  
**Sent:** 24 January 2015  
**To:** PlanningPolicy  
**Subject:** Mount pleasant development

Good day

I am a resident whos flat backs the present post office site. Presently the museum is being built.

I am in favour of the residents forum plan.

A. The light distribution is greater ( even the small annex built onto the present post office museum has removed 10% or more of winter light) and thats just a single storey.

B. The openness lends itself to an inclusive residential surrounding all sides

C. The design is more fitting within the surrounding georgian and victorian properties

I will support the Mount Pleasant Forums design proposal.

Frances Hanlon  
[REDACTED]

Sent from Samsung tablet

## Vickers, Ben

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**From:** Francois Smit [REDACTED]  
**Sent:** 12 January 2017 21:21  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South) EC1A 1BB

Dear Planning Officer

I am writing as Chairman of Margery Street Tenants and Residents Association in support of the planning application made by the Mount Pleasant forum the development of part of the Mount Pleasant site.

We have been kept involved in this development and when consulted and informed by the forum on this estate there has been support for aims and objectives of the Forum in the redevelopment of this site. In particular we support:

- better provision of good community housing (ie affordable housing) than Royal Mail proposal
- no looming tower blocks - the proposed 8-storey height of the development is very acceptable
- pleasant "traditional" modern mansion block design fits in with neighbourhood
- more accessible green open space
- pocket park gives focus to SW corner and prevents rat-run - gives pleasant ambience to primary school area and helps air pollution issues.
- less car-parking than Royal Mail scheme - better for environment and traffic congestion issues
- useful retail units to bring vitality back into area
- pedestrian links through the site, making the development part of the community and making the development site more accessible and more porous.

We therefore hope that the planning committee will take into account the view of local people who, while understanding that this site needs to be developed, hopes that it will accord with our views and feelings

Yours sincerely

Francois Smit  
Chair

## Vickers, Ben

---

**From:** Gillian Darley [REDACTED]  
**Sent:** 22 January 2017 14:55  
**To:** PlanningPolicy  
**Subject:** Mount Pleasant CRBTO

Dear Planners and Councillors,

I would like to give warm support to a scheme that has been drawn up to translate the aims and counter the objections (both local and widespread) to the RMG proposals, and to process it into a potentially realisable form.

The advantages are manifestly obvious, including lowering maximum building height, improving massing, grain and texture of this corner of the overall scheme area, upgrading the amenities and open spaces and dealing with infrastructure and sustainability. It aims high, as the RMG plans failed to do.

Assuming that there will be a continued rigorous review of the design (the neo-traditionalist architecture and planning signalled in the visualisations are, I consider, disappointing) I hope that this project will flag up the practical possibilities for handing London neighbourhoods back to those who live and work there, and those who wish to join them. It could be seen as a kind of cooperative venture, of a sort familiar enough in northern Europe where the approach is not seen as hopelessly Utopian but eminently practical. It is a way to reconnect people to place, I hope not too late in the day. It must be properly communal, not cynically speculative.

We have lived just west of [REDACTED] for over thirty years. I was, for a while, chair of the Friends of St George's Garden, my husband (Michael Horowitz) is Treasurer of Coram's Fields. As a former architectural correspondent of the Observer, a biographer/author who continues to write, broadcast and speak in public about many aspects of architecture planning and landscape design, both contemporary and historic, I take a keen interest in this exercise.

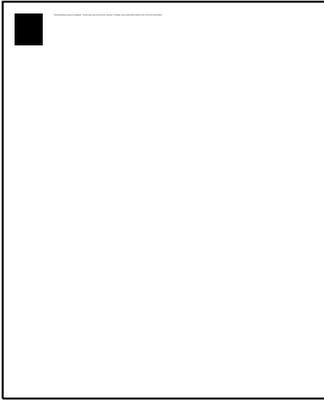
With no constraints in the form of existing protected buildings, with a ready, willing and long-term settled local population, with a dedicated group of professionals and volunteers, this CRBTO must be allowed to succeed and flourish. It could become a London-wide example as the overheated property market continues to batter the resilience of the city and undermine the planning system.

best wishes,

Gillian Darley OBE

[www.gilliarlarley.com](http://www.gilliarlarley.com)

■



## Home - Gillian Darley

[www.gilliandarley.com](http://www.gilliandarley.com)

"My interests focus on intriguing buildings, beguiling landscapes, inspiring people. One thing leads to another, unlikely connections emerge. Writing about the ..."

## Vickers, Ben

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**From:** Graeme Weston <[REDACTED]>  
**Sent:** 26 January 2017 23:15  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South), EC1A 1BB

I am writing in response to the consultation regarding the Community Right to Build Order at Phoenix Place (South), EC1A 1BB

Firstly, let me state very clearly, as a local resident I am absolutely and very strongly in favour of this proposal.

I applaud and welcome that this alternative plan to Royal Mail's awful scheme was made with true community participation. This is in stark contrast with Royal Mail's sham "consultations" and hollow promises.

I particularly like that the overall design is a lower profile than Royal Mail's proposal, with a maximum of eighth storeys instead of 16, and has better planned and more sensible access routes across the site as well as more, and better designed, green-spaces.

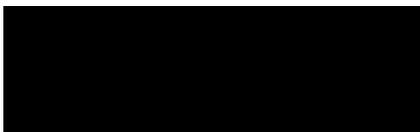
Whilst I appreciate the bar has already been set as to roughly how much affordable housing can be provided due to the former Mayor's misguided decision to approve the Royal Mail's plans against local wishes, I am nevertheless gladdened that this alternative plan manages to provide more and better community homes despite the difficulties imposed.

The pocket park is of course a welcome addition, and is particularly well placed as it is adjacent to the Christopher Hatton Primary School, which occupies a very cramped site.

Belonging to a non-car owning, cycling family, I welcome the much reduced car parking, which will help make the surrounding streets a safer place for my, and my neighbours', children to enjoy.

Please inform me of the final decision.

Graeme Weston



**Vickers, Ben**

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**From:** Gonet, Teresa <Teresa.Gonet2@highwaysengland.co.uk>  
**Sent:** 02 December 2016 14:03  
**To:** PlanningPolicy  
**Cc:** Planning SE; Burgess, Janice; Katesmark, Steve; Katesmark, Steve  
**Subject:** FAO Strategic Planning and Implementation Team - Highways England response re Mount Pleasant Community Right to Build Order - Consultation

**For the attention of:** Strategic Planning and Implementation Team

**Consultation: Community Right to Build Order at Phoenix Place (South), EC1A 1BB**

Dear Sirs,

Thank you for your email dated 30 November 2016, advising Highways England of the above consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN). In this case M1 and M4. Having examined the above document, we do not offer any comment to this proposal.

Kind regards

**Sent on behalf of Janice Burgess – Spatial Planning Manager at Highways England.**

**Teresa Gonet,**  
**OD SE Spatial Planning Team**  
Highways England | Bridge House | 1 Walnut Tree Close | Guildford | GU1 4LZ  
**Tel:** +44 (0) 300 470 1165

Web: [www.highways.gov.uk](http://www.highways.gov.uk), [www.highwaysengland.co.uk](http://www.highwaysengland.co.uk)



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## Vickers, Ben

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**From:** jpdelight . [REDACTED]  
**Sent:** 21 January 2017 14:31  
**To:** PlanningPolicy  
**Subject:** Fwd: Community Right to Build Order at Phoenix Place (South) EC1A 1BB

To planing  
re MPA new application

Please be advised that my self and neighbours fully support the MPA application and would much prefer and like to see **this** go ahead for many obvious reasons and benefits, and whole heatedly s many times better than the Royal Mail one that was approved by former Mayor Boris Johnson.

Many thanks  
J Paul Libard [REDACTED]  
Gloria Alberci [REDACTED]  
Gloria Mendoza [REDACTED]  
Olive ad Peter [REDACTED]

## Vickers, Ben

---

**From:** Evans, James [REDACTED]  
**Sent:** 24 January 2017 09:04  
**To:** PlanningPolicy  
**Subject:** Re:the Mount Pleasant Neighbourhood Forum's Community Right to Build Order

I would like to support the Mount Pleasant Neighbourhood Forum's Community Right to Build Order (CRTBO). This is a good local development which is far superior to that proposed by the Royal Mail Groups.

James Evans

[REDACTED]

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## Vickers, Ben

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**From:** Ian Stallard <ian@fredriksonstallard.com>  
**Sent:** 23 January 2017 22:47  
**To:** PlanningPolicy  
**Subject:** RE: Community Right to Build Order at Phoenix Place (South) EC1A 1BB

Dear Sir/Madam,

RE: Community Right to Build Order at Phoenix Place (South) EC1A 1BB

As director of James Hartnoll Estates Ltd, which owns 13 commercial units directly adjacent to the proposed development site at Phoenix Place, I am writing to express our fullest possible support for the proposal that has been put forward for this site by the Mount Pleasant Neighbourhood Forum. It is totally appropriate for our neighbourhood on so many levels: in terms of scale, provision of excellent levels of both housing and commercial space and, importantly, accessible communal green space. The proposal provides more homes, more commercial space, and more communal space, without the ridiculous proposal of a 15 story block which would turn our neighbourhood into a dark wind tunnel. The proposals design serves to enhance this historic neighbourhood with it's many surviving Georgian buildings, unlike the Royal Mail proposal which identified it's aesthetic with undoubtedly the most ugly building in the neighbourhood - the Holiday Inn on Kings Cross Road.

I was present at the meeting at City Hall where the Royal Mails proposals were put before Boris Johnson, and witnessed for myself how major concerns by everybody present (Camden Council, Islington Council, local residents and businesses) were summarily ignored in favour of the sole supporter, Royal mail. This was a travesty of justice and we are so pleased that the Mount Pleasant Neighbourhood Forum have created a proposal that we believe works for everyone, whilst still creating desperately needed housing and real communal spaces with real access for everyone.

Please, please accept this proposal. It offers a truly successful solution to our neighbourhood that will provide a lasting legacy and inspiration to other developments throughout the country.

Yours faithfully,

Ian Stallard  
James Hartnoll Estates

## JAMES HARTNOLL ESTATES LTD

10A WARNER STREET  
LONDON EC1R 5HA  
UK  
PHONE: +44 (0)20 7278 5000

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## Vickers, Ben

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**From:** John Chamberlain [REDACTED]  
**Sent:** 16 December 2016 14:19  
**To:** PlanningPolicy  
**Subject:** Mount Pleasant Community Right to Build Order - Consultation

I am writing in support of the application from the Mount Pleasant Association for a Right to Build Order. This application is exactly what is intended by the Localism Act and should be supported 100% by Camden. It is also an excellent plan, in my opinion.

--

Regards  
John Chamberlain

[REDACTED]

[REDACTED]



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## Vickers, Ben

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**From:** John Levitt [REDACTED]  
**Sent:** 25 January 2017 23:16  
**To:** PlanningPolicy  
**Subject:** Community Right to Build at Phoenix Place (South) EC1A 1BB

To the Planning Officers at Camden Council in charge of **the Mount Pleasant / Phoenix Place Housing proposals:**

I am writing in support of the proposal and plans put forward by the by the Mount Pleasant Neighbourhood Forum . and in opposition to the Royal Mail proposal.

I live in **Holsworthy Square** overlooking the above mentioned site and have done so for almost thirty years.

This well thought out proposal from the Mount Pleasant Community Forum has many advantages including -:

- good provision of affordable community housing
- the eight storey height of mansion blocks is ideal proposed retaining the human element
- more accessible green space
- the pocket park will help with issues of local air pollution
- less traffic congestion and safer for children and adults alike
- available car parking safer for the environment
- good pedestrian links through site
- good and safe alignment with the comings and goings at Christopher Hatton Scholl
- All the above are conducive to a pleasant communal and local environment ..

I strongly recommend that this proposal be accepted.

Yours faithfully,

John Levitt

[REDACTED]

## Vickers, Ben

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**From:** Jonathan Avis [REDACTED]  
**Sent:** 09 January 2017 11:46  
**To:** PlanningPolicy  
**Subject:** Mount Pleasant Neighbourhood Forum Community Right to Build Order at Phoenix Place (South), EC1A 1BB

Dear Camden Planning department,

I wish to express my strong support for the Mount Pleasant Neighbourhood Forum's Community Right to Build proposals at Phoenix Place, for the following reasons:

- The architectural designs are in keeping with the character of the surrounding area
- The scale and bulk of the buildings is more appropriate to the location than the Royal Mail's proposals
- The provision of green space is superior
- The integration into the public realm and surrounding streets is excellent
- The proposals consider sustainability strongly
- The proposals allow for affordable housing and community amenities

I am a local resident (45A Calthorpe Street) overlooking the Mount Pleasant site. I strongly object to the previous proposals put forward for the redevelopment of the site by Royal Mail and I am proud and supportive of the community right to build proposals, and urge you to approve them and do everything you can to support these efforts.

Kind regards

Jonathan

--

Jonathan Avis



## Vickers, Ben

---

**From:** judith dainton [REDACTED]  
**Sent:** 15 December 20[REDACTED]  
**To:** PlanningPolicy  
**Cc:** mpnf-exec@googlegroups.com; calthorpe.street@gmail.com; John Cryne  
**Subject:** Community Right to Build Order at Phoenix Place (South) EC1A 1BB

Dear Sirs

I write as a resident of [REDACTED] and also as Secretary of Calthorpe Street Residents Association and Chair of Mount Pleasant Neighbourhood Forum.

I write to support this community led scheme as an excellent use of that, at present, derelict site.

- The proposal provides much needed housing and commercial space in a sympathetic manner, and blends into the existing townscape.
- The proposed housing shows a greater housing gain per square foot than does the existing Royal Mail Group proposal for this section of the Royal Mail development site.
- The "mansion block" style of design with inner courtyard and throughway pedestrian access is both modern in finish but traditional in concept, harking back to the design of Holsworthy Square, the Bourne Estate and the Margery Street Estate. This is a very welcome and thoughtful design solution which harmonises with local surroundings
- This design fits in with the local area - unlike the high-rise tower and bulky fortress-like blocks proposed for this spot by Royal Mail and much hated by all local residents.
- In contrast, this design does not dominate and enclose the area, it does not block light and views; and it allows through-way pedestrian access across the whole site, facilitating local journeys to and from the shops and services at Mount Pleasant and Gray's Inn Road. This project opens up a "dead" area into a human space where people can live, shop, work, walk and sit/hang out/see their friends, without a feeling of enclosure and noise/air pollution.
- The proposed pocket park provides a welcome addition of public open space for residents and school children alike.
- Not only is that proposed green space a much needed social asset; it also will provide help with air pollution (dangerously high in this locality with some recordings of 60+ NO2 pollution).
- The pocket park will also minimise the "rat-run" problems of the Laystall Street/Mount Pleasant/Gough Street junction, which at the moment is in need of traffic calming due to dangerous proximity to the local primary school Christopher Hatton.
- Minimising the "rat run" itself will also help minimise air pollution, as will the planting in the pocket park

Altogether I cannot recommend this project more highly - it is well designed, fit for purpose, and backed consistently by the majority of local residents.

I do hope that you will give this community-led development your unqualified approval.

With best regards

Yours faithfully

Judy Dainton.

## Vickers, Ben

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**From:** Julie Riley [REDACTED]  
**Sent:** 25 January 2017 17:25  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South) EC1A 1BB

Dear Planning dept,

I am writing now to express my support for the above.

As a close neighbour I have been following the re-development proposals for the Mount Pleasant site and like yourselves I was not in agreement AT ALL with application passed by Boris Johnson as Mayor of London in October 2014.

This right to build order has properly assessed and addressed the issues presented by the area at Phoenix Place (South) and its environs and puts forward a proposal that is as pleasing as it is functional.

- Our area has huge need for more community housing and this offers more than the Royal Mail (RM) application and in my view, better quality.
- the modern take on the traditional mansion block is far more sympathetic to and fitting for the type of buildings/housing already there so what is proposed would fit in pleasantly and not stand in opposition to the existing neighbourhood.
- the Holiday Inn is enough of an eyesore in this area and yet the RM proposal used this as a precedent and suggested we should have more towering blocks of such a height. In fact I believe they would have actually been taller in that spot which would be devastating to the light quality for the school and the existing local residents. Not to mention how ominous it would be to sit in the shadow of such a beast. 8 storeys is far more acceptable and humane.
- the order proposes accessible green space, much needed in these parts, especially near the school
- air pollution is a major issue so less car parking and less incentive for cars generally can only be good.
- this application seems to me that it would open up the site in terms of pedestrian access which is a huge positive for everyone. It must feel like it belongs to the community. Achieve this and crime rates will go down and value will increase.

Best regards

Julie Riley

Chair New Calthorpe Estate TRA  
[REDACTED]

**Vickers, Ben**

---

**From:** Jules [REDACTED]  
**Sent:** 10 January 2017 16:09  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South) EC1A 1BB

Dear Sirs,

As a local resident living adjacent to this development site, I cannot iterate enough my support for a community-centric projected build such as this. The horrifying proposals for towering, light-reducing blocks turning surrounding streets into lightless canyons as put forward by the Post Office initially, would have cried a death knell to any kind of community cohesion in this very important small piece of London.

We need architecture sympathetic with the existing surrounds, safe and pleasant access, affordable accommodations and provision of accessible green spaces where possible. This already population dense area does not need more of a sense of overcrowding, or enclosure nor can it sustain the traffic 'rat-run' as originally proposed or the totally unsafe Farringdon Rd crossing point!

The Community Right to Build Order proposals, as far as I can see, will make Mount Pleasant a desirable living and working space, supporting rather than detracting from the community heritage.

Julie Williamson  
[REDACTED]

**Vickers, Ben**

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**From:** Juliet Liddell [REDACTED]  
**Sent:** 17 January 2017 15:15  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South) EC1A 1BB

To whom it may concern.

Re: Community Right to Build Order at Phoenix Place (South) EC1A 1BB

I would like to write to you today to confirm my preference of the Mount Pleasant Forum plan over that of the one current proposed by Royal Mail at Phoenix Place.

In particular I would like to mention that the Mount Pleasant Forum plan does the following:

- better provision of good community housing (ie affordable housing) than Royal Mail proposal
- no looming tower blocks - the proposed 8-storey height of the development is very acceptable
- pleasant "traditional" modern mansion block design fits in with neighbourhood
- more accessible green open space
- pocket park gives focus to SW corner and prevents rat-run - gives pleasant ambience to primary school area and helps air pollution issues.
- less car-parking than Royal Mail scheme - better for environment and traffic congestion issues
- useful retail units to bring vitality back into area
- pedestrian links through the site, making the development part of the community and making the development site more accessible and more porous.

I ask that the planning committee takes into account the view of local people like me who, while understanding that this site needs to be developed, hopes that it will accord with our views and feelings.

Kind Regards,

Juliet

Juliet Liddell  
[REDACTED]

**Vickers, Ben**

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**From:** Meg Howarth [REDACTED]  
**Sent:** 11 December [REDACTED]  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South), EC1A 1BB

## **Community Right to Build Order at Phoenix Place (South), EC1A 1BB**

I wish to register my full support for the above application.

Thank you.

Meg Howarth



**Vickers, Ben**

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**From:** Nancy Mayo [REDACTED]  
**Sent:** 07 December [REDACTED]  
**To:** PlanningPolicy  
**Subject:** Mount Pleasant Community Right to Build Order - Consultation - SUPPORT

Dear Sir / Madam,

I am writing to express my support and admiration for the Mount Pleasant Neighbourhood Forum scheme drawn up under the Community Right to Build Order. The designs are immeasurably superior to the earlier developer-led proposal for 15-storey brutalist tower blocks.

The Mount Pleasant mid-rise designs, by contrast, will deliver a very high-quality neighbourhood, offering a good quality of life and environment for local residents.

Kind regards,

Nancy Mayo  
[REDACTED]

**Vickers, Ben**

---

**From:** Natalie Denby [REDACTED]  
**Sent:** 08 December 2016 23:18  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South), EC1A 1BB

Dear Sir or Madam,  
I am a long time local resident and very much in favour of the proposed scheme.  
Yours sincerely,  
Natalie Denby

## Vickers, Ben

---

**From:** ALLEN, Sarah J <Sarah.ALLEN@nats.co.uk> on behalf of NATS Safeguarding <gmb-bdn-000913@nats.co.uk>  
**Sent:** 02 December 2016 13:24  
**To:** PlanningPolicy  
**Subject:** Your Ref: Phoenix Place South (Our Ref: SG24037)

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully,

Sarah Allen  
Technical Administrator  
On behalf of NERL Safeguarding Office

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## Vickers, Ben

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**From:** Harries, Sally (NE) <Sally.Harries@naturalengland.org.uk>  
**Sent:** 05 December 2016 15:54  
**To:** PlanningPolicy  
**Subject:** IG acknowledged 6.12.2016 202927 Mount Pleasant Community Right to Build Order - Consultation Mount Pleasant  
**Attachments:** NE Feedback Form June 2015.PDF

Dear Sir/Madan,

Thank you for your consultation on the Community Right to Build at Mount Pleasant.

Natural England has no substantive comments to make.

However, we would expect the ambition for the site to be to demonstrate net gain for biodiversity. There are many enhancements that could be included for example; designing swift, black redstart or bat bricks into the fabric of the building as appropriate; using native species and those rich in nectar suitable for pollinators, and to provide foraging and shelter for birds. There are opportunities here to include living walls, and roofs and rain gardens all of which can contribute to a sustainable drainage system as well as contributing to a sense of place and aiding climate change resilience. The development should integrate into the overall multi-functional green infrastructure for the area.

If you have any further questions please contact me.  
Kind Regards.

Sally Harries

Sustainable Development  
Thames Team  
Tel: 0300 060 2933 / 0208 026 4005

Mob: 07900 608 263

Please note: My working week is Monday - Thursday.

**Natural England,  
Area 3A, Nobel House,  
17 Smith Square, London SW1P 3JR**

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

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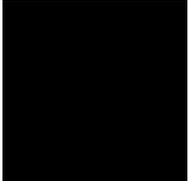
**Vickers, Ben**

---

**From:** Paul PODGORSEK [REDACTED]  
**Sent:** 26 January 2017 14:33  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South) EC1A 1BB

Dear Sir or Madam,

Being a nearby resident, I am writing to support the Mount Pleasant Association's Community Right to Build Order. Here is my address:



Giving a higher priority to pedestrians sets a good aim for the future by reducing congestion and putting the focus on public transport, which in turn would improve air quality, something very important that we were all reminded of a few days ago.

By making the area more active and welcoming new retail units, this will also help the existing ones.

London has always been a mix of all sorts of buildings: large and small, old and new, posh and modest, commercial and residential, with green spaces scattered across town. This contributes to making people feel comfortable living here.

Other housing areas in London such as Canada Water haven't put their focus on tall buildings but have instead tried to keep a balance between the above. Results are there: they are attractive and successful areas which should probably be taken as examples.

I hope the Mount Pleasant Association's Community Right to Build Order will be approved.

Yours faithfully,  
Paul Podgorsek.

**Vickers, Ben**

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**From:** paul stevens [REDACTED]  
**Sent:** 20 January 2017 13:01  
**To:** PlanningPolicy  
**Subject:** community right to build order at phoenix place ( south ) EC1A 1BB

I write in support of the Mount Pleasant Forum plan for the redevelopment of the Mount Pleasant site.

It would provide a saner, fairer and healthier option than the proposed altrnatine.

Paul Stevens, Margery Street Tenants and Residents Association.

**Vickers, Ben**

---

**From:** Richard Sawyer [REDACTED]  
**Sent:** 21 January 2017  
**To:** PlanningPolicy  
**Subject:** Mount Pleasant development

My wife and I have resided in [REDACTED] for about 15 years and wish to support the Mount Pleasant Association idea of development to avoid the sky scraper in the Royal Mail proposals. We support the idea of a pocket park adjacent to Laystall Court with traffic calming in Mount Pleasant. Thought should also be given to reopening the River Fleet and opening a tube station between Farringdon and King's Cross which will soon be overloaded and not serve this area conveniently. Thank you for your consideration .

**Vickers, Ben**

---

**From:** Ruth Tomlinson [REDACTED]  
**Sent:** 25 January 2017 11:55  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South) EC1A 1BB

To Whom it may concern,

As a local resident I would like to add my comments of support for the Mount Pleasant forum's proposal for the site.

I have two small children so the access to more green space is always welcome and would improve our quality of life, especially so close the school I hope my children will attend. As a tenant, affordable housing would be perhaps present us the opportunity for buying within this vibrant area in which we love living.

The pedestrian links would make traversing the current location so much easier and would open the area up.

I sincerely hope the forums suggestions will listened to and acted upon.

Ruth Tomlinson

## Vickers, Ben

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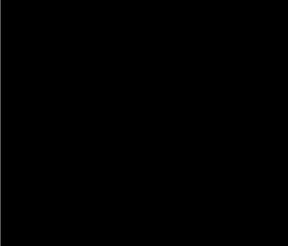
**From:** Sean McDonagh [REDACTED]  
**Sent:** 16 January 2017 13:16  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South) EC1A 1BB

Dear Sir/Madam,

I am writing in support of The Community Right to Build Order at Phoenix Place (South) EC1A 1BB. For the following reasons:

- 1: It offers better provision of good community housing (GENUINELY affordable housing) than the existing Royal Mail proposal
- 2: The height of the building is preferable in scale to those of the existing Royal Mail proposal
- 3: The building design fits in with the neighbourhood
- 4: There is a good proportion of ACCESSIBLE green open space
- 5: The 'pocket park' in the South West corner would help traffic flow and pollution issues  
Provides retail units
- 6: The pedestrian links through the site increase accessibility and sit well within the framework of the existing community

Sean McDonagh



## Vickers, Ben

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**From:** Zoe Hughes <Zoe.Hughes@sportengland.org>  
**Sent:** 02 December 2016 10:08  
**To:** PlanningPolicy  
**Subject:** Mount Pleasant Community Right to Build Order - Consultation

Thank you for consulting Sport England.

The proposed development is not considered to fall either within our statutory remit (Statutory Instrument 2015/595), or non-statutory remit (National Planning Policy Guidance Par. 003 Ref. ID: 37-003-20140306) upon which we would wish to comment, therefore Sport England has not provided a detailed response.

General guidance and advice can however be found on our website:

<http://sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/>

If the proposal involves the **loss of any sports facility** then full consideration should be given to whether the proposal meets Par. 74 of National Planning Policy Framework, is in accordance with local policies to protect social infrastructure and any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place.

If the proposal involves the provision of a **new sports facility** then consideration should be given to the recommendations and priorities set out in any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority may have in place. In addition such facilities, to ensure they are fit for purpose, should be designed in accordance with Sport England, or the relevant National Governing Body, design guidance notes:

<http://sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

If the proposal involves the provision of additional **housing (<300 units)** then, if existing sports facilities do not have the capacity to absorb that additional demand, new sports facilities should be secured and delivered in accordance with any approved local policy for social infrastructure, local standards and/or priorities set out in any Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place.

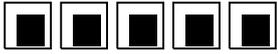
*Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.*

Yours sincerely

Planning Administration Team  
Planning.south@sportengland.org



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF



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**Vickers, Ben**

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**From:** Susan Haskins [REDACTED]  
**Sent:** 26 January 2017 11:45  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South), EC1A 1BB

I am writing in support of the Mount Pleasant Neighbourhood Forum's Community Right to Build Order at Phoenix Place (South), EC1A 1BB. The plans they have proposed present a human-scale low-rise development in keeping with the surrounding area yet offering more homes and more communal green space. It has the support of the local community as expressed through the successful activities of the Forum and will not have the negative impact of the proposals put forward by the Royal Mail Group. It has been created with the local community in mind. I totally endorse these plans.

Yours sincerely

Susan Haskins  
[REDACTED]

**Vickers, Ben**

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**From:** Tony Allen [REDACTED]  
**Sent:** 10 January 2015  
**To:** PlanningPolicy  
**Subject:** CRTBO MOUNT PLEASANT

You will have all the details of this application, you should know it well. So I am simply writing to add our names in support of the application.  
tony allen and Joyce Moseley

**Vickers, Ben**

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**From:** Collister, Trudi [REDACTED]  
**Sent:** 30 November [REDACTED]  
**To:** PlanningPolicy  
**Subject:** Community Right to Build Order at Phoenix Place (South), EC1A 1BB

Dear Sir/Madam,

I would like to add my endorsement of this scheme as a local resident of 20 years. I applaud the initiative and know how strongly many local residents feel about this design and the positive impact it will have on the local community.

Yours faithfully,

Trudi Collister  
[REDACTED]

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THANK YOU.

## Vickers, Ben

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**From:** Umiak [REDACTED]  
**Sent:** 24 January 2017 09:44  
**To:** PlanningPolicy  
**Subject:** Bv logged and replied 24-01-2017 Community Right to Build Order at Phoenix Place (South) EC1A 1BB

Letter of Support

I live in Calthorpe Street, opposite the Royal Mail Site.  
I welcome the Community Right to Build Order from the Mount Pleasant Neighbourhood Forum.

The design is much more low rise and sympathetic than the Royal Mail plan.

The heights are lower, there are more green spaces.

The plan reduces traffic and air-pollution.  
Me and my neighbours hope it will get permission.  
Umiak

**REDINGTON FROGNAL**  
NEIGHBOURHOOD FORUM

Strategic Planning and Implementation  
Regeneration and Planning  
2<sup>nd</sup> Floor, 5 Pancras Square  
London  
N1C 4AG

7 December, 2016

Dear Sir,

Redington Frogna! Neighbourhood Forum would like to offer its strong support for the Community Right to Build Order proposal from the Mount Pleasant Association.

This is an excellent mid-rise solution, which builds on the site's heritage and delivers the sort of sustainable accommodation where people will be happy to live.

The traditional designs proposed will very positively enhance the area and are to be applauded. The design should serve as a model for future developments.

Yours faithfully,

Penny Davis  
Vice Chair

Redington Frogna! Neighbourhood Forum  
<https://rfforum.wordpress.com>