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Stewart Murray
Assistant Director - Planning
Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

Dear Mr Murray

Royal Mail Group Mount Pleasant Planning Applications

We have just been informed that the GLA issued its decisions on these applications yesterday.

This letter records the London Borough of Islington's and London Borough of Camden's protest against the Mayor of London's decision to approve the Royal Mail Group's (RMG) planning applications for this site subject to the terms of a Section 106 Agreement which both councils have been requested to sign.

The councils accept that they no longer have the power to determine the applications because the Mayor has taken planning powers upon himself. However, the councils do not accept that the Mayor has exercised those powers correctly. Our reasons for this follow.

1. Contrary to the Development Plan the Mayor has failed to secure the maximum reasonable level of affordable housing that these sites can deliver.
2. The Mayor has failed to secure adequate viability review mechanisms that will enable the maximum reasonable level of affordable housing to be secured, which is contrary to the assurances given at the Hearing.
3. The Mayor has failed to secure adequate linkages between the sites. This is inconsistent with the Supplementary Planning Document for the site, the premise of the applications that assumes comprehensive delivery across the two sites, and the viability assessment. This failure is likely to lead to unacceptable consequences, particularly in relation to the lack of provision of open space on the Camden part of the site.
4. The GLA has not robustly scrutinised the viability evidence presented by the RMG nor has it properly considered the evidence provided by the councils and their advisors.
5. We have significant concerns relating to the substantial changes to the GLA's viability advisors' initial report dated 23rd May 2014. This report largely supports the councils' position on viability, and the basis on which subsequent changes to the report have been made remains to be fully explained.
6. The councils are concerned that a range of information exchanged between the Royal Mail and the GLA's advisors has still not been provided to us, and we continue to seek this information.

7. Some of the rents to be charged in the affordable rented homes have been set at a level that exceeds those applied by Registered Providers. This raises concerns regarding deliverability and the ability of the scheme to meet local housing needs. There remains a lack of clarity relating to the affordable housing values applied in the RMG's viability assessments. We therefore have no assurances that affordable rented homes at lower rents could not be provided.
8. The applications fail to comply with a number of other important development plan policies.

The Mayor has therefore failed to take proper account of Development Plan policies, national and professional guidance, other material considerations and the evidence provided by the councils relevant to these issues.

He has based his decision on deeply flawed information in relation to viability and in particular the ability of the scheme to deliver more affordable housing.

He has failed to comply with the undertakings that he gave at the Hearing that he would:

- secure adequate linkages between the Camden and Islington sites; and
- secure a viability review mechanism that will provide a quantum and form of additional affordable housing required by the development plan.

Furthermore, the Mayor has not, as promised, provided an open and transparent process for consulting with the two councils on the viability of the proposal and the level of affordable housing secured within the Section 106 agreement. As a result the councils have been deprived of their legitimate opportunity to make properly informed representations on this aspect of the Mayor's decision as reflected in the Section 106 agreement.

Confidentiality restrictions relating to the updated viability assessments which are unacceptable to both councils have also been imposed.

Each of these matters has been addressed on many occasions in our representations and correspondence with the Mayor.

The councils have therefore signed the Section 106 Agreement under protest. They have done so as responsible planning authorities because they consider that they have no option in the circumstances. They have done so because as a party to the Agreement, the councils are best able to secure compliance with the obligations contained within it.

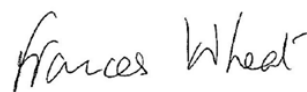
The councils have signed the Agreement without prejudice to their clear position that the grant of planning permission subject to the terms offered by the Section 106 Agreement is open to legal challenge for failure to give proper effect to policy and to other important material considerations.

Kind Regards,



Karen Sullivan

Service Director – Planning & Development
London Borough of Islington



Frances Wheat
Assistant Director - Regeneration and
Planning
London Borough of Camden