



**Town Hall**  
**Judd Street**  
London WC1H 9JE

Councillor Phil Jones

**T** 020 7974 1928  
**E** phil.jones@camden.gov.uk



**Town Hall**  
**Upper Street**  
London N1 2UD

Councillor James Murray

**PA** Katherine McNamara  
**T** 020 7527 3090  
**E** katherine.mcnamara@islington.gov.uk

The Rt Hon Eric Pickles MP  
Secretary of State for Communities & Local  
Government  
Eland House  
Bressenden Place  
London SW1E 5DU

7<sup>th</sup> January 2015

Dear Secretary of State,

**THE TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77**

**Request to ‘call-in’ planning applications relating to Mount Pleasant Sorting Office**

**Planning references: Islington P2013/1423/FUL & P2013/1425; Camden 2013/3807/P; GLA D&P/3032a&b**

1. This major development comprising more than 600 residential units has the potential to provide a significant number of affordable homes to meet the acute housing needs that persist in London. However, the Royal Mail have submitted viability evidence which the councils’ advisors have found to be unreliable and contrary to government guidance, and which has the effect of artificially suppressing the level of affordable housing in the scheme. As a result these proposals conflict with important national, London Plan and local policies and fail to contribute sufficiently to meeting London’s urgent housing needs. It is for this reason, among others set out below, that we request that you call-in the above application.

**Background**

2. Following a request by the Royal Mail’s planning agents for the Mayor to call-in the application, on 21 January 2014, the Mayor gave a direction to be the Local Planning Authority for the determination of this application under the Town and Country Planning (Mayor of London) Order 2008.
3. The Camden Planning Committee considered the application relating to the part of the development within their borough on 27 February 2014, and Islington Planning Committee considered the application relating to the Islington part of the site on 10 March 2014. Both councils concluded that had they been in a position to determine the applications, they would have refused planning consent. Islington cited nine areas where the application was contrary to the Development Plan and Camden referred to six reasons for refusal for the respective applications.
4. Since the call-in of the applications by the Mayor, Islington and Camden councils have been engaged in ongoing discussions with the Royal Mail and Greater London Authority (“GLA”) in relation to the

applications. The councils have submitted a number of further letters and written representations to the Royal Mail and the Mayor for their consideration.

5. Despite the extent of concerns evidenced by the councils, the GLA Mayoral Hearing report (“**Hearing Report**”), published on 26 September 2014, which set out the GLA’s full views for the first time, recommended that the Mayor grant permission for the applications. The Mayor’s Public Hearing took place on Friday 3 October 2014 at City Hall, at which the boroughs were collectively given 30 minutes and community representatives from the Mount Pleasant Association were given a total of 15 minutes to present their case. The Mayor resolved to grant planning permission subject to an agreed Section 106 Agreement, despite the strong opposition to the scheme expressed before, during and after the Hearing.
6. The councils have subsequently written to the Mayor requesting that he addresses the councils’ outstanding concerns and that he renegotiates with the Royal Mail to secure a better deal for Londoners. He has however declined to do so.
7. The councils have also highlighted a range of further issues and provided additional representations to the parties relating to the S106 Agreement, for which a significant number of important matters remain unresolved.

### **The Secretary of State’s power to call-in the Applications**

8. Section 77(1) of the Act provides that the “*Secretary of State may give directions requiring applications for planning permission...to be referred to him instead of being dealt with by local planning authorities.*”
9. The current criteria for exercising this discretion were confirmed in a Statement by Nick Boles MP on 26<sup>th</sup> October 2012 that: “*The Secretary of State will, in general, only consider the use of his call-in powers if planning issues of more than local importance are involved. Such cases may include, for example, those which in his opinion:*
  - *may conflict with national policies on important matters;*
  - *may have significant long-term impact on economic growth and meeting housing needs across a wider area than a single local authority;*
  - *could have significant effects beyond their immediate locality;*
  - *give rise to substantial cross-boundary or national controversy;*
  - *raise significant architectural and urban design issues; or*
  - *may involve the interests of national security or of foreign Governments.*

*However, each case will continue to be considered on its individual merits.”*

10. The councils recognise the government’s intention that it will only use its powers to recover planning applications sparingly and that Local Planning Authorities are normally best placed to make decisions relating to their areas. However in this case it is evident that the Mayor has not taken proper account of the evidence before him. The Mount Pleasant applications raise a range of issues that are of much more than local importance and that engage the criteria that are relevant to a call-in. In the absence of a fair and objective decision making process, we consider that the Secretary of State is better placed to determine these applications following an Inquiry conducted by the Planning Inspectorate which allows these issues to be fully aired and scrutinised.
11. Further details of why these applications engage the criteria referred to in the above statement are set out below.

## **May conflict with national policies on important matters**

### Meeting affordable housing need

12. Meeting housing need, in particular through the provision of affordable housing, is a key national policy objective. In particular, the National Planning Policy Framework requires that local planning authorities should boost significantly the supply of housing by using their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period (paragraph 47).
13. There is an overwhelming need for affordable housing in Islington and Camden. As set out in the 2013 London Strategic Housing Market Assessment (SHMA), when taking into account London's high housing costs, approximately 28% of households are considered to be living in poverty. The 2013 SHMA identifies a need for 25,600 additional affordable dwellings per year, representing more than half of the total housing need. Whilst being home to some of the richest people in London, at the same time the boroughs are also home to intense poverty and deprivation. For example, close to a third of Islington households have incomes of less than £20,000 per year, a higher proportion than the London average, and more than 8,000 Islington residents have a total annual income, including all benefits, of less than £10,000.
14. The result is that tens of thousands of households in the two boroughs are waiting for affordable housing. With the median house price now more than 12 times higher than the median income, the need for affordable housing, predominantly at social/ target rent levels, is particularly high.
15. Mount Pleasant is one of the sites which are critical to the delivery of the boroughs' housing strategy in accordance with paragraph 47 of the NPPF above. The site has been identified as a key site for redevelopment within in the Islington Finsbury Local Plan (2013), the Camden Site Allocations Development Plan Document (2013) and the Mount Pleasant Supplementary Planning Document, adopted jointly by the boroughs in 2012.
16. Maximising affordable housing provision on this site is accordingly a critical priority for the boroughs. As set out in their adopted Development Plans, 50% of new housing delivered over the plan period is required to be affordable. Of those schemes that are of sufficient size to require on-site delivery of affordable housing, very few are over 100 units and schemes of a strategic size (over 500 units) come forward very exceptionally. Where strategic-scale schemes such as Mount Pleasant do come forward they therefore play a critical role in increasing affordable housing supply to meet the level of demand, and the larger the scheme the greater potential there is to boost supply.
17. Against this background, the significance of ensuring that on-site provision for high-yield schemes such as Mount Pleasant meet the boroughs' 50% targets becomes clear as does the particular importance of there being a robust justification for delivery which falls short of this.

### Viability/ affordable housing approach contrary to national policy guidance

18. The councils have identified a range of fundamental concerns with the approach adopted by the Royal Mail relating to the assessment of viability of the development, including that this is not in accordance with the government's Planning Practice Guidance. The councils' viability consultants have advised that the Royal Mail's viability assessment is based on a number of unrealistic assumptions and that at least 42% affordable housing could viably be provided, compared with 23.9% offered by the Royal Mail.

19. Amongst these, a key issue is the approach to land value, which Planning Practice Guidance acknowledges is “*central to the consideration of viability*” and is an “*important input to a [viability] assessment*”.
20. In determining the viability of the development, Royal Mail’s consultants Gerald Eve have adopted a land value that does not take into account policy requirements or Community Infrastructure Levy charges that will apply to the scheme. In doing so they have disregarded the government’s Planning Practice Guidance which states that: “*In all cases, land or site value should: reflect policy requirements and planning obligations and, where applicable, any Community Infrastructure Levy charge...*” [Paragraph 23].
21. This approach is also inconsistent with RICS Guidance on Viability in Planning which states that: “*Site Value should equate to the market value subject to the following assumption: that the value has regard to development plan policies and all other material planning considerations and disregards that which is contrary to the development plan.*” [Emphasis added]
22. This is significant because if a viability assessment adopts a land value that is inflated due to the prospect of the grant of planning permission but does not reflect the policies and costs associated with securing the consent, it is almost inevitable that those policies cannot be achieved. This conflicts with the key national planning policy objective of meeting housing need.
23. The councils recognise the need for a land owner (and developer) to achieve a competitive return as set out in the NPPF. In this case however Royal Mail have assumed a high fixed land value which amounts to a premium far in excess of the level that would normally be required to secure the availability of a site for redevelopment. In doing so, however, the Royal Mail have disregarded the Development Plan policies that 50% of housing delivered over the plan period should be affordable and that the maximum reasonable affordable housing should be provided by individual sites taking into account the 50% target.
24. This is in essence a self serving exercise to significantly lower the level of affordable housing that must be provided to ensure that they achieve the maximise possible return for the land when they come to sell this to an as yet unknown developer.
25. This is a critical issue as without planning consent this site has no significant inherent value based on its existing use, and the existing use will be retained within the development. Therefore most of the identified land value is derived from the grant of consent for residential use, which is dependent on the scheme according with the Development Plan, whilst also taking into account material considerations.
26. Market based evidence used by Gerald Eve to justify the land value was found to lack sufficient analysis and not to be genuinely comparable. The sites used by Gerald Eve do not reflect the level of enabling costs that apply to Mount Pleasant and in the main they have high existing use values which underpin the value of the land for development and which will be lost through redevelopment.
27. In addition, Gerald Eve have assumed that the entirety of the cost of their works, which will enable them to retain their current operations on the site, should be a cost to the developer paid for by reduced affordable housing, rather than being paid for by the Royal Mail from their land receipt or reflected in a lower payment. This assumes that a developer would pay the same amount for a site that involved them incurring abnormal costs, compared with another site where there are no such additional costs. The councils’ viability advisors however consider that this is unlikely to be the case. This effectively amounts to additional value achieved by the Royal Mail over and above the land value as they are able to retain their existing use and achieve the benefit of a new facility at no extra cost.

28. A further irregularity is that from the outset of the application, Royal Mail has contended that their assumed site value should remain unchanged, despite changes to the many other variables that would affect site value, including a significant reduction in the number of units on the site.
29. Gerald Eve's approach to the Community Infrastructure Levy also clearly conflicts with Planning Practice Guidance (PPG). Their position is that the additional costs associated with the Islington CIL, which was adopted on 1<sup>st</sup> September 2014, are borne entirely by a reduced affordable housing offer, and are not reflected in land value, despite PPG stating that in all cases CIL costs should be reflected in land value. There has also been a lack of transparency relating to the way that CIL charges have been calculated, and it has not been demonstrated that account has been taken of the Mayoral and borough instalment policies.
30. The Mayor's advisors accepted the Royal Mail's position however in doing so admitted that they had also disregarded Planning Practice Guidance. The reasoning given in the GLA Hearing Report for this is that the market has not had time to take into account the Islington CIL Charging Schedule. This is simply not credible. The council first consulted on its CIL charging rates in 2012 and undertook two further consultations in 2013, followed by a Public Examination which the Royal Mail took part in (represented by their agents DP9 and Gerald Eve who are acting on this site). The residential rate for this location has remained the same throughout this process.
31. The Islington CIL Charging Schedule was approved by an examiner from the Planning Inspectorate in March 2014 and adopted on 1st September 2014. With no developer currently on board, a future developer would clearly be expected to have regard to this fixed cost when purchasing the site. As well as being established in government guidance, this approach was fully envisaged within the Mayor of London's CIL Examiner's Report which stated that '*a reduction in land value is an inherent part of the CIL concept*'.

**Significant effects beyond the sites' immediate locality and significant long-term impact on economic growth and meeting housing needs across a wider area than a single local authority**

32. The acceptance of a market value approach to determining land value without sufficient regard to the Development Plan on this high-profile site could have significant effects relating to other developments beyond this locality. The Mayor's acceptance of this sends a strong message to the market that land owners and developers can ignore planning policies and CIL charges in land transactions.
33. In addition to this the councils' viability advisors have identified a range of other concerns with Royal Mail's viability assessment which they consider understates the viability of the development in order to limit the level of affordable housing in the scheme. If these applications were to be approved in their current form, this would encourage other land owners and developers to take a similar approach.
34. This could have a significant impact on planning authorities' ability to secure affordable housing and other planning requirements to ensure that development is sustainable. Such an approach undermines the UK Planning System which Statute and the National Planning Policy Framework establish is planned.
35. This may also have a significant long-term impact on economic growth and meeting housing needs across London. Housing affordability is one of the most significant issues in London, and there is a direct link between housing costs and economic growth. When taking into account London's high housing costs, approximately 28% of households are considered to be living in poverty.<sup>1</sup>

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<sup>1</sup> London Strategic Housing Market Assessment, GLA, 2013.

36. The Financial Times reports that the economic impact of the rising property market in London is damaging the economy and directly impacting upon the capital's workforce in relation to recruitment, wages, punctuality and productivity<sup>2</sup>. The London Chamber of Commerce and Industry (LCCI) identifies that rising housing costs pose a threat to the competitiveness and resilience of London's economy. Businesses have echoed the sentiment by demanding that more affordable homes be built in the capital<sup>3</sup>.
37. Despite clear evidence that a far greater proportion of affordable housing could be provided, the scheme fails to properly address affordable housing needs in London. The applications will potentially be used as a justification for the adoption of inflated market based land values in other London developments and beyond, and will also encourage other land owners and developers to adopt viability arguments that underestimate the viability of development proposals. This could have a direct and significant impact on affordable housing provision, and consequently long term economic growth and meeting housing needs across a much wider area than a single authority.

### **Give rise to substantial cross-boundary or national controversy**

38. Many aspects of this development proposal give rise to substantial cross-boundary and national controversy. This is demonstrated by the extensive national and London media coverage by a range of UK TV and radio broadcasters, newspapers and specialist publications including: BBC News, BBC Radio, ITV News, The Guardian, The Independent, The Evening Standard, Architects Journal and Building Design. These are also proposals for which there is widespread opposition from residents and community groups, represented by the Mount Pleasant Association.
39. Consideration is given to further controversial aspects of the scheme below, in addition to those that have already been raised.

#### Viability Evidence, site value and privatisation

40. With no developer on board, these planning applications are an exercise to increase the value of Royal Mail's land. This reflects Royal Mail's property strategy which has been to derive maximum value from their surplus assets (which as mail facilities have relatively little value) through securing planning consents for development and selling to developers<sup>4</sup>.
41. The councils' viability advisors have concluded that the approach adopted by Royal Mail's consultants in respect of a number of key aspects of their viability assessment has the effect of suppressing the level of affordable housing so that Royal Mail can sell their land with a relatively 'obligation free' consent and maximise the value they receive for the land. The Mayor's decision to disregard each of these issues, despite being made aware of them, contradicts the approach set out in the London Plan that development viability appraisals should be evaluated rigorously.
42. The outcome of this is that there is significant 'hidden value' in the scheme. As a result, if the applications are approved in their current form, Royal Mail are likely to achieve a value for the site, far in excess of the landowner return that the Royal Mail and the Mayor have deemed is necessary for the land owner to achieve a 'competitive return'. This is at the expense of desperately needed affordable housing which could be provided without making the development unviable.

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<sup>2</sup> Financial Times, London's employers warn of economic effect of soaring housing costs, 28<sup>th</sup> July 2014

<sup>3</sup> London Chamber of Commerce and Industry, Getting our House in Order: The Impact of Housing Undersupply on London Businesses <http://www.londonchamber.co.uk/DocImages/12438.pdf>

<sup>4</sup> See for example: The Telegraph (14<sup>th</sup> May 2012) "Royal Mail Plans to Build Homes at Iconic Central London site". <http://www.telegraph.co.uk/finance/newsbysector/supportservices/9263276/Royal-Mail-plans-to-build-homes-at-iconic-central-London-site.html>

43. The identification of undeclared excess value in the Mount Pleasant viability assessment is consistent with the findings of the National Audit Office's Report into the Privatisation of Royal Mail which identified hidden value of £330m to £830m in the three London surplus sites at Mount Pleasant (8 acres), Paddington (one acre) and Vauxhall Nine Elms (13.8 acres). The sites were together valued at £200m for the privatisation.
44. Royal Mail have already received £111m for their Paddington site with the potential to receive an additional £20m if the new owners secure a new planning consent and further payments if the site is sold within two years<sup>5</sup>. Royal Mail had argued during the planning application process that their proposal could not meet the local policy requirement of providing 25% affordable housing onsite and in fact could not viably support any onsite affordable housing, a conclusion that was disputed by the council's viability advisor. Instead a total financial contribution was offered of £7.9m in addition to allowing for the costs associated with a potential expansion of an Underground ticket hall.
45. The high actual land value achieved by the Royal Mail as a result of the resolution to grant planning consent (compared with the relatively low inherent value of a mail centre), gives a strong indication that a significant level of onsite affordable housing could have been provided in this proposal. It is also significant that the value achieved by the Royal Mail for this, by far the smallest of the London surplus sites, amounts to more than half of the value ascribed to those sites for the purposes of the privatisation.
46. The Royal Mail have recently begun marketing their Vauxhall Nine Elms site. They previously secured planning permission for the site for which they argued that the proposed scheme (incorporating up to 1870 residential units) could not provide the policy target of 50% affordable housing. They argued that this was unviable with the minimum requirement of 15% affordable housing, producing a *negative* land value, even when projected growth in residential values had been taken into account. The site has however been identified by market analysts as being likely to attract a value very significantly higher than the negative value identified in the Royal Mail's viability assessment<sup>6</sup>.
47. With the sites not withheld from the privatisation, or subject to any clawback arrangement to ensure that the full benefit of sale of the sites was retained for the public purse, Mount Pleasant provides the only opportunity to ensure that the development of these sites genuinely contributes towards the public good. However if the applications are granted consent in their current form, as the Mayor has resolved to do, this opportunity will be lost.
48. Furthermore, if the applications are approved on this basis, the high land values that the Royal Mail are likely to require will very significantly hinder, not assist, the sustainable development of the site. This is because these land costs will need to be borne by a future developer/s, or more likely, following the purchase or joint venture for the site, they will be used as the basis for arguing for reduced affordable housing and other planning requirements in any potential future planning applications for the site. There are no measures within the current application proposals to safeguard against this.
49. These are matters of substantial regional and national controversy that warrant the full and transparent examination that would arise following call-in of the site.

#### Change of approach of the Mayor's viability consultants GVA

50. The sudden and unexplained change in approach of the Mayor's advisors GVA also raises further controversy. GVA issued a report in May 2014 that appeared to agree with many of the points that

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<sup>5</sup> <http://www.royalmailgroup.com/disposal-paddington-site>; the new owners are in the process of securing a new consent for residential and retail development

<sup>6</sup> <http://www.theguardian.com/business/marketforceslive/2014/oct/15/ftse-slumps-by-nearly-3-but-royal-mail-bucks-falling-trend>

councils' advisors BPS made. BPS modelled GVA's findings and concluded that an offer of 30-39% affordable housing could be supported even assuming the high levels of profit accepted by the GLA.

51. However, Royal Mail did not amend their offer to fit these initial conclusions as might reasonably be expected. Their offer was much lower at 24% affordable housing – double their previous offer of 12%, but only marginally higher than the 'indicative' figure of 20% referred in the planning applications. Furthermore, the revised 24% offer incorporated affordable rented housing which would be charged at higher rents than the social rented accommodation included in the previous offers.
52. GVA subsequently issued a revised report dated 5th August 2014 taking a completely different approach and agreed that the Royal Mail should receive a much higher payment for the site. Important parts of GVA's report, such as the timing of land payments, were deleted without explanation. GVA reached a conclusion that directly corresponds with the Royal Mail's affordable housing offer of 24%.
53. It subsequently transpired that additional information had been exchanged between Royal Mail, the GLA and GVA from which the councils were at the time excluded, contrary to agreed arrangements for a transparent process. The councils have on a number of occasions requested but have still not been provided with all the relevant information, correspondence and details of discussions that took place during this period and subsequently between the parties.
54. The councils have still been provided with no adequate explanation as to why key parts of the GVA report were amended and who made the decision to amend the report. These changes included a reduction in the scope of their assessment and the removal of statements of fact. There remains little evidence that the GLA have themselves properly interrogated or questioned the basis of Gerald Eve's viability assessment or the reasons for the change in approach adopted by GVA, or explored the reasons for the significantly different and evidenced conclusions of BPS. The Hearing Report merely states that some issues raised previously by GVA have 'fallen away' with no further explanation. In withholding a number of background documents and information, despite their prior agreement to not do so, the GLA, whilst appearing to fail in their own duty to rigorously assess the viability information, have also deprived the boroughs of the ability to fully consider this themselves.

#### Affordability

55. Serious concerns remain relating to the affordability and deliverability of the affordable housing. In the absence of detail provided by the Royal Mail, and no engagement with Registered Providers (contrary to the London Plan and Mayor's Housing Supplementary Planning Guidance), there can be no certainty that the 'affordable' housing offer forms a realistic basis for a future agreement between a developer and a Registered Provider to deliver these homes.
56. Royal Mail has indicated only a *blended* average rent level of 44% market rent (and maximum rent level of 60% of market rent) across the affordable rent units, without providing information relating to the rents for different unit sizes. The market rent assessment underlying the valuation of the affordable housing units was conducted in October 2013, so it likely underestimates both present-day and future market rents.
57. The Royal Mail have argued that rents will be limited by the Mayor's requirement that affordable rents in London do not exceed the maximum Local Housing Allowance rate, however we are concerned that rents set at the LHA Caps would not be affordable for future occupiers. Registered Providers have their own rent setting policies which govern the maximum rent levels which are set for new lettings based on a variety of factors including what tenants can afford and the benefit cap. While different Registered Providers set their rent ceilings in different ways, these are generally below the maximum LHA weekly rates, particularly for family-sized units. As a result, it is highly unlikely that units at maximum possible rents would either be deliverable or provide for those in greatest housing need.



58. Similarly, total housing costs on a 2-bed intermediate unit have been estimated at over £2,000 per month for purchase of a 30% share of equity with a £50,000 deposit. This is over half of the take-home pay of households at the top of the eligible income range and would therefore be very high risk for an Registered Provider to acquire.
59. Moreover, there can be no certainty that the offer actually bears any relation to the affordable housing values that formed inputs to the viability appraisal. The Royal Mail has not provided sufficient justification or evidence for their valuation of the affordable housing units, nor responded to our requests to share their valuation so that the approach could be appropriately scrutinised. This lack of transparency also calls into question the Mayor's and his advisor's ability to conclude that the values are reasonable. Without such fundamental information it is not possible to determine whether the affordable housing offer is the best that can viably be provided.

#### Site Linkages

60. A further controversial aspect of the scheme is that the proposals do not properly secure essential linkages between the Camden and Islington parts of the site to ensure that it is developed as a single development. This is inconsistent with both councils' planning policies and the approach originally envisaged in the applications. Without this the development will generate unacceptable environmental impacts. However, Royal Mail continue to be vehemently opposed to committing to meaningful linkages between the sites. This is to enable them to achieve their expressed intention of selling the Camden and Islington parts of the site separately in order to maximise their receipts for the land.
61. They have argued that linkages between the sites would impact on viability despite the viability assessment being predicated on the basis of the site being developed as a whole, which has, for example, influenced the profit level adopted. The councils continue to be of the view that the Royal Mail's proposals regarding site linkages are insufficient and that if supported, these would require the need for a full reassessment of viability to reflect the scenario that they have put forward.

#### Viability review mechanisms

62. Effective viability review mechanisms are crucial to meeting the policy requirement of securing the maximum reasonable level of affordable housing. The Mayor has however accepted that the 'pre-implementation review' would not take place if part of the enabling works have taken place within three years of grant of the planning consent. If the permissions are implemented it is highly likely that this stage of development will be reached within three years (the permissions expire after three years), in which case half of the development (at the least) will not be subject to a review at the point of delivery. This is despite the many irregularities and uncertainties identified relating to the initial viability assessment and the likelihood of significant changes in residential values at this prime Central London location, which will be just minutes away from the new Crossrail Station at Farringdon.
63. Other aspects relating to the review mechanisms remain subject to discussions between the parties. The S106 drafting put forward by the Royal Mail seeks to severely curtail the scope of the review mechanisms, again with the aim of limiting affordable housing provision and maximising the land receipt. This conflicts with the statement in the GLA Hearing Report that "*review mechanisms that are effective and equitable and ensure the maximum reasonable amount of affordable housing over the life of the development would be assured*", as well as intention set out in the London Plan that review mechanisms can be used to secure maximum public benefit.

#### Other issues

64. The applications also conflict with the development plan in a range of ways, further details of which are set out in the councils' representations to the Mayor. These include: harm to neighbouring residential

amenity (through loss of daylight); harm to the setting of statutorily listed terraced properties and the Bloomsbury Conservation Area; the provision of car parking, contrary to local policy, despite being in a highly accessible location that already suffers from poor air quality; the provision of comfort cooling for the private flats which will increase the CO2 emissions of the scheme; failure to meet local policies on Sustainable Urban Drainage in this Critical Drainage Area; the scheme no longer provides a pedestrian refuge on Farringdon Road where 'The Garden' public open space meets Farringdon Road, thereby reducing the connectivity of the site to the wider local area and reducing the 'Green Chain' benefits of the scheme.

65. In this instance there can be little argument that the proposals do not give rise to significant cross-boundary and, in parts, national controversy.

## **Conclusion**

66. We firmly believe that it is in the public interest that these matters be determined by you, following an inquiry conducted by the Planning Inspectorate. This would enable these significant unresolved issues to be properly considered in a fair, robust and transparent manner and to reinstate confidence in the decision making process.

67. The reasons that we have set out for this are of far more than local significance and go to the very heart of the Government's commitment to meeting housing need through the delivery of affordable housing in accordance with the fundamental policy objectives of the NPPF. Such is the urgency of housing need in our Boroughs that public confidence in the planning system's ability to deliver will be severely undermined unless these proposals are determined fully in accordance with the housing policies of the NPPF. As things stand, they will not be. That is why we urge you to intervene.

68. In order for you to be able to consider these matters fully, we also request that you exercise your power to give a direction restricting the grant of planning permission by the Mayor of London until you have reached a conclusion whether to call-in the application. We would be happy to provide you with further evidence relating to the issues set out in this letter as set out in the council's correspondence and representations to the Mayor and the Royal Mail.

Yours sincerely,



**Councillor James Murray**  
Executive Member for Housing and Development  
London Borough of Islington



**Councillor Phil Jones**  
Cabinet Member for Regeneration, Transport and Planning  
London Borough of Camden

C.c: National Planning Casework Unit

Oliver Shepherd, DP9

Boris Johnson, Mayor of London

Edward Denison, Chair of the Mount Pleasant Association

Jeanette Arnold, London Assembly

Andrew Dismore, London Assembly

Emily Thornberry MP

Frank Dobson MP

Amyas Morse, Comptroller and Auditor General, National Audit Office

Adrian Bailey, MP, Business, Skills and Innovation House of Commons Select Committee (Chair)

The Rt Hon Margaret Hodge, MP, Public Affairs House of Commons Select Committee (Chair)

Clive Betts, MP, CLG House of Commons Select Committee (Chair)