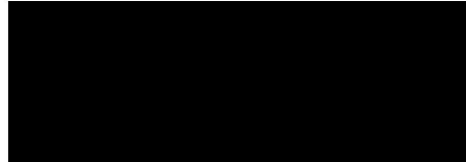




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Ms K Henry
London Borough of Camden
Planning Department
5 Pancras Square
London
N1C 4AG



18th November 2019

Dear Ms K Henry,

**ST PANCRAS COMMERCIAL CENTRE, 63 PRATT STREET, LONDON, NW1 0BY
DEMOLITION AND COMPREHENSIVE MIXED-USE REDEVELOPMENT OF THE ST PANCRAS
COMMERCIAL CENTRE (REF. 2019/4201/P)
OBJECTION BY ROYAL MAIL GROUP LTD**

On behalf of our client Royal Mail Group Limited ('Royal Mail'), Cushman & Wakefield has been instructed **to object** to the planning application (Ref. 2019/4201/P) for the demolition of comprehensive mixed-use redevelopment of the St Pancras Commercial Centre, 63 Pratt Street, London, NW1 0BY.

Background

Parcelforce operates a parcels collection and delivery system with 54 depots across the UK feeding 3 automated tracking and sorting hubs serving over 30,000 customers nationwide, as well as operating within an international network that can reach 99.6% of the worldwide population.

Royal Mail owns the freehold of the Central London Local Depot ('Central London LD') located at 24-58 Royal College Street, London, NW1 0QA. The depot accommodates vital postal services for London and the rest of the country. Both vehicular and pedestrian access is located off St Pancras Way, and Royal Mail is a long established business in this location, operating within this mixed-use area for many years.

The proposal for the comprehensive redevelopment of an adjacent industrial site for mixed use development comprising office space, light industry, retail and residential accommodation is of major concern for Royal Mail. If the application is approved, new residential units will be introduced close to a busy and continually operational site. From previous experience, this proximity is likely to give rise to future amenity issues and challenges for the proposed occupiers, in particular, noise generated by activities within the yard and vehicular movements to and from the site, particularly during its early and late operational hours.

Operations

The Parcelforce site employs approximately 200 members of staff, with approximately 140 Royal Mail vehicles and 70 private vehicles on site at any one time.

It is operational between 2200 hours and 1300 hours 6 days a week with Sunday operations taking place between 0600 hours and 1400 hours and recommencing at 2200 hours. This means that the site is only non-operational for an eight hour period for the entire week and demonstrates the continually busy and extensive nature of the Central London LD's operations.



The majority of delivery drivers arrive between 0700 hours and 0800 hours and return to the depot for approximately between 1630 hours and 1830 hours – although it should be noted that there is a constant flow of drivers entering and exiting the site. Peak vehicle movements are between 1800 hours and midnight each day, with steady movement every hour after that until approximately 0600 hours. Peak [parcel] loading and unloading activity is between 1600 hours and 2200 hours and 0500 hours and 0730 hours, respectively. On average there are between 11,000 and 19,000 parcels handled/processed each day at the site, equating to between 77,000 and 133,000 parcels each week.

Potential Conflict of Land Uses/Residential Amenity

Whilst Royal Mail acknowledges the need for new housing delivery in Camden to meet local need, introducing sensitive residential uses within such close proximity to existing business operations presents a real risk to the continued operation of those business units – in this instance the Central London LD. If the housing element is permitted, there is a danger that the operation patterns of the depot will impact on the residential amenity, leading to complaints to Environmental Health which in turn will potentially lead to restrictions being placed on the site making it unsuitable for continued use.

Introducing additional residential uses as a neighbour is not compatible with the Central London LD use. Detrimental impact on residential amenity is likely and could lead to noise complaints and, potentially, sanctions on Royal Mail's operations, which could result in us having to remove certain operations from the site altogether.

Royal Mail is also extremely concerned about the proposed bedroom windows and balconies south-facing as illustrated in the Design and Access Statement and Proposed 3rd and 4th floor plans as submitted by the applicant. Although these units are not directly adjacent to the Central London LD service yard, the south-facing windows and balconies present a tangible risk of negative impact on resident's amenity which may in turn lead to complaints about Royal Mail operations. The applicant should revisit the design of the scheme to remove this risk.

The Site Allocation

Paragraph 3.13 of the applicant's submitted Planning Statement notes the development pipeline of this part of the London Borough of Camden, citing several developments being proposed and forthcoming alongside 'the significant site allocations of the Royal Mail Depot...' This paragraph appears to allude to Site 37 of the Council's adopted Site Allocations Plan (2013) which earmarks the Central London LD site for redevelopment comprising, among other things, mixed uses with employment floorspace and new permanent residential floorspace – though it does not specify the number of residential units or quantum of employment floorspace.

Royal Mail would like to reiterate that we have no intention of relocating the Central London LD from its current base and that, consequently, there is no prospect of such development coming forward. We consequently request that the application is considered within this context and that the site allocation is recognised as being inaccurate.

Delivery and Servicing Impact

Paragraph 14.35 of the applicant's Planning Statement notes that there will be a maximum inflow of 9 service and delivery vehicles with a maximum average stay of 25-30 minutes each. Paragraph 5.4.1 of the Delivery and Servicing Plan notes that the expected delivery times to the proposal site are between 0600 hours and 2000 hours.



Due to the continually busy nature of the Central London LD as mentioned above, Royal Mail is also concerned that these delivery timings will conflict with the operation of the Central London LD, especially during peak delivery hours. This continually busy environment increases the chances of our delivery vehicles and a servicing/delivery vehicle accessing the proposal site clashing and thereby negatively impeding Royal Mail's ability to execute its essential function.

To ensure that the depot is appropriately safeguarded in all aspects, we respectfully request that, should your Council be minded to approve the application, appropriate conditions controlling delivery and servicing vehicles to/from the proposal site are imposed to minimise conflict with the continued operation of the Central London LD site.

Noise, Vibration and Ventilation Assessment

A Noise, Vibration and Ventilation Assessment ('NVVA') was produced by Hann Tucker Associates in support of the proposed development.

Chapter 6 of the NVVA reports the results of conducted survey and Table 1 of this section clearly demonstrates that the noise levels at Position 1 – the survey location at the proposed residential element – reached up to 51dB during the night time period which is 16dB above the recommended noise level as per British Standard 8233:2014. It should also be noted that the NVVA has not appropriately considered the Central London LD as a key source of noise within the area, which Royal Mail finds insufficient given the very close proximity between the application site and the depot location. Left unmitigated, such a noise climate is extremely likely to negatively impact a prospective resident's amenity.

In accordance with the National Planning Policy Framework, the planning system should prevent "*new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of... noise pollution*" (NPPF, Paragraph 170: E).

Paragraph 182 of the NPPF is clear that "*existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established*". This 'agent of change principle' captures the idea that those introducing a change in the use of land should manage the impact of that change. Recent case law (*Cemex (UK Operations) Ltd v Richmondshire District & Anor [2018] EWHC 3526 (Admin)* and *R (oao Ornuo Ingredients Ltd) v. Herefordshire Council [2018]*) has illustrated the importance of addressing this principle in decision-making.

Chapter 12 of the NVVA notes that achieving an acceptable noise climate so as to not negatively impede residential amenity can be executed by using conventional and uprated double thermal glazing. Whilst this noise attenuation measure has been referenced in both the NVVA and the submitted Planning Statement, Royal Mail is extremely concerned that without the imposition of an appropriate condition to address this, the applicant will not adequately implement a noise mitigation strategy and thus, fail to address the 'agent of change' principle.

Royal Mail respectfully requests that the London Borough of Camden appropriately consider the likely impact of Royal Mail operations on the amenity of the proposed use and apply the 'agent of change principle'.

Royal Mail and other existing businesses in the vicinity make an important contribution to the local economy and it is important they are protected. Without the proper attenuation measures fully accounted for within the design, the proposal should be considered contrary to principles contained within the NPPF.

Therefore, an appropriate design review and subsequent mitigation measures must be undertaken by the applicant to minimise the risk of any complaints by residents about Royal Mail's operations.



Conclusion

We respectfully ask that the planning application is refused permission on the basis of its potential impact on the continued operation of the Central London LD, the incompatibility of the proposal's residential land use and the Central London LD site, and the noise climate prospective residents will be immediately introduced to without the appropriate attenuation.

If your Council is minded to grant planning permission, we request that the permission is conditioned to protect Royal Mail's continued ability to operate from the site through the regulation of the internal noise environment through mitigation measures, such as triple glazing on all affected bedroom windows in the scheme and/or appropriate mechanical ventilation throughout the proposal – particularly those blocks and windows referred to above.

We look forward to confirmation that this objection has been received and that the matters raised will be taken into consideration in your assessment of this application. Please do not hesitate to contact Jodane Walters should you require any further information.

Yours sincerely,

