

Mr Patrick Marfleet
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Your Ref 2020/0728/P
Our Ref 2007TX00

03 July 2020

Dear Mr Marfleet

SUBMISSION OF OBJECTION ON BEHALF OF ROYAL MAIL GROUP LIMITED

PLANNING APPLICATION REF. 2020/0728/P – DEVELOPMENT OF A HEALTH CARE FACILITY (D1/C2) COMPRISING BASEMENT, GROUND, PLUS FOUR STOREY AND ROOFTOP GRADES, PAVILION AND PLANT ENCLOSURE, AT FORMER CAR REPAIR CENTRE, 70-86 ROYAL COLLEGE STREET, LONDON, NW1 0TH

On behalf of our client Royal Mail Group Limited ('Royal Mail'), Cushman and Wakefield submitted an objection to the planning application for a health care facility (D1/C2) comprising basement, ground, plus four storey and rooftop pavilion and plant enclosures at 70-86 Royal College Street, London on 31 March 2020.

Since this time Royal Mail have continued dialogue with the applicant, and we submit the following update.

We note that the application is referred to Planning Committee on 9th July with recommendation for approval.

Royal Mail own and operate the Parcelforce Central London Local Depot immediately adjacent to the development site. The development proposes a health care facility, including bedrooms for intermediate care which would overlook the existing Parcelforce car park and service yard. Details of Parcelforce operations were provided in our previous submission.

Concerns raised within our previous submission related to the operational impacts on Parcelforce, and the need to ensure that existing operations are not unduly impacted by the proposed new use.

We have now had a chance to review the Planning Committee Report and make the following further submissions.

Boundary Wall

The boundary wall between the Parcelforce depot and the development site is owned by Royal Mail and located on Royal Mail land. The applicant has asserted this is a party wall to be removed as part of the development. Royal Mail has confirmed that it owns the wall and will not consent to its removal. As such the wall will not be altered or demolished as part of the proposed development or any planning permission.

The applicant is now aware that the redline boundary to their Site Location Plan is incorrect, as it is shown to be down the middle of the boundary wall. This wall is not a party wall and is entirely in Royal Mail's ownership.

The Demolition Plan provided within the applicant's Design and Access Statement (page 21) suggest this wall will be removed. The proposed Site Location Plan and Proposed Massing Studies submitted do not show the wall in place.

This is incorrect. The Site Location Plan should be updated to show the wall outside the application red line. The Demolition Plan should be updated to show the wall retained. We request correct plans are submitted to ensure accurate consideration of the boundary treatment and development in context.

In particular, the following drawings referenced in the draft decision at Condition 2 show Royal Mail wall within the red line of the application site area:

- DWG #1485_00(00)_001 – Existing Location Plan
- DWG #1485_00(00)_002 – Existing Site Plan
- DWG #1485_00(00)_011 – Proposed Location Plan
- DWG # 1485_00(00)_012 – Proposed Site Plan
- DWG #1485_00(00)_100 – Existing Ground Floor Plan
- DWG #1485_00(00)_200 – Proposed Ground Floor Plan

Condition 2 also refers to the Design and Access Statement (February 2020) for approval.

No notice has been served on Royal Mail, and Royal Mail are not listed as owner of any land subject to the planning application on the Ownership Certificates attached to the application. As the applicant completed Certificate A on the Ownership Certificate this currently means the Certificate is incorrect. If the applicant is proposing any work to Royal Mail land, e.g. demolition of the wall, this should be referenced, the Ownership Certificate should be corrected, and the appropriate Notices served.

Royal Mail does not consent to the removal of this wall, and so the plans as referred to above should be corrected and submitted to the Council prior to determination of the application.

Noise

No reference is made within the Noise Assessment submitted with the application (Syntegra Consulting, 2020) to noise emissions directly from the loading and unloading of vehicles within the Parcelforce yard area. As such, an assessment has been undertaken by BWB (2020) on behalf of Royal Mail, in accordance with BS 4142:2014+A1:2019, using the submitted assessment and noise data from historical measurements from similar developments, including HGVs arriving, manoeuvring, and loading/unloading.

Results indicate that the noise emissions from Royal Mail site are predicted to be above the background (L90) noise levels, demonstrating 'significant adverse impact' during the daytime and night-time periods in accordance with BS 4142:2014+A1:2019. The assessment also shows that Camden Council's requirement for 10 dB below background (L90) sound level is not achieved. Mitigation is therefore required.

Internal noise levels specifically attributable to service activities would be within the advocated ambient (Leq) and maximum (LAFmax) design criteria with windows closed, but should windows be partially opened for ventilation (assuming 10-15dB typical noise attenuation) internal design criteria levels within the different room spaces would not be met.

Paragraph 182 of the NPPF (2019) confirms the agent of change principle, and responsibility of the applicant to ensure suitable mitigation to protect existing businesses; *“existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”*

To ensure the amenity of future occupiers is not adversely affected by noise, openable windows (natural ventilation) cannot be relied on and mechanical ventilation should be provided.

The recommended glazing/vent strategy proposed for the healthcare development is considered sufficient to protect against daytime and night-time internal ambient noise levels and should be secured by condition.

Condition 24 of the draft decision notice states *‘The noise level in rooms at the development hereby approved shall meet the noise standard specified in BS8233:2014 for internal rooms and external amenity areas. Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise in accordance with the requirements of Policy A1 of the Camden Local Plan’.*

We request this condition is attached to any planning permission to ensure appropriate mitigation is in place to protect future occupiers and Parcelforce existing use.

Transport

The application proposes 1 disabled parking space, 1 ambulance space and a delivery/servicing yard accessed via a new gated access in the same position as the eastern access for the existing facility. Lack of on-site parking (and residential permit holder only on-street local parking) and proximity to frequent bus and rail services mean reliance on most trips to/from the site being made by non-car modes.

Vehicular and pedestrian access to the Parcelforce site is provided from two points, from St Pancras Way directly to the operational service yard, and from Royal College Street to a staff car, located directly to the east of the application site.

The site is operational 24 hours a day, 6.5 days a week. Peak vehicle movements are between 0600 hours and 0930 hours and 1800 hours and midnight each day when vehicles leave or arrive at the site, both via St Pancras Way and Royal College Street.

We request the following conditions are attached to any planning permission to protect Parcelforce ongoing operation:

- 1) The development shall not be occupied until a Delivery and Service Management Plan has been submitted and agreed with the Local Planning Authority to confirm collection times and frequency for private refuse. Reason: to ensure no adverse impact on the local highway network and goods vehicles are accommodated on site in accordance with the supplementary planning document Camden Planning Guidance on Transport.
- 2) No vehicle larger than a standard 7.5t box van shall be used for deliveries/servicing of the site. Reason: to ensure no adverse impact on the local highway network and goods vehicles are accommodated on site in accordance with the supplementary planning document Camden Planning Guidance on Transport.

Construction Management Plan

The submitted Construction Management Plan gives only limited consideration to the impact of the proposed development on operations at the Parcelforce site and no detail of how these impacts will be managed.

Significantly it refers to dialogue with Royal Mail regarding details of the Construction Management Plan, which is not accurate. No dialogue with Royal Mail took place prior to the submission of the application. Both the service yard and staff car park operate at full capacity and no space will be provided within either area to facilitate the proposed development, during or after construction.

Informative 6 of the draft decision notice advises that the *'developer and appointed/potential contractors should take the Council's guidance on Construction Management Plans (CMP) into consideration prior to finalising work programmes and must submit the plan using the Council's CMP pro-forma..... No development works can start on site until the CMP obligation has been discharged by the Council'*.

The proximity of Royal Mail boundary wall to the development site and importance of maintaining access to Parcelforce, means careful consideration of the Construction Management Plan is essential.

We request the submission and approval of a detailed Construction Management Plan is secured by appropriately worded condition:

- 1) No development shall take place, including any works of demolition, until a Construction Management Plan to consider impacts of the construction phase has been submitted to, and approved in writing by the Local Planning Authority. The approved Construction Management Plan shall be adhered to throughout the construction period. The method statement shall provide for details of the following:
 - *protection of the boundary wall during construction*
 - *the parking of vehicles of site operatives and visitors*
 - *location of loading and unloading of plant and materials*
 - *hours of demolition/construction/delivery*

Reason: to safeguard the amenities of occupiers and neighbours in the local area in accordance with Policy A1 of the Camden Local Plan.

Royal Mail should be consulted on the submitted CMP to ensure appropriate consideration to the existing Parcelforce use and to ensure the CMP is accurate, robust and manages any risk.

Development Context

The applicant's Planning Statement (paragraph 2.10) and Design and Access Statement (page 14) refer to the allocation of the Parcelforce site within LBC Site Allocations Plan (2013) for residential and employment redevelopment.

The committee report refers to the Council's emerging Site Allocations Plan which proposes allocation for mixed-use development comprising employment floorspace and permanent self-contained homes, and the draft supplementary planning document Canalside to Camley St, expected to be published for consultation later this year, which proposes a new quarter in St Pancras and *'significant transformation in terms of intensification of the mix of uses and the character and appearance of the area'*.

The Proposed Site Plan and Proposed Massing Studies within the applicant's Design and Access Statement, illustrate 'potential mews development' on the Parcelforce site. This underestimates the development potential of the site, and does not reflect the advice of the Council's Design Review Panel, which noted inter alia "that the design team be realistic about the potential scale and typology of any future development on this adjacent site, and the impact this may have on the quality of the proposed internal spaces".

While the allocation confirms opportunity for future residential and employment redevelopment, the potential mews development' shown does not reflect the aspirations of Royal Mail or any dialogue with the Local Planning Authority related to this site. The potential development shown should better reflect the development potential of the site and the context clarified to Members to ensure consistency with the approach taken by the applicant on the St. Pancras Commercial Centre site immediately to the north (ref: 2019/4201/P).

We continue to recognise the need for health care facilities across the London Borough of Camden but request the proximity of the proposed development to an operational delivery yard, with significant vehicle movements and noise generating uses during early morning and late evening times, is appropriately and accurately considered.

The established site is an important asset for Parcelforce and the local economy. Parcelforce provide an essential postal service to local businesses and residents and continued operation should be protected.

I would be grateful if you could confirm receipt of this supplemental letter and additional information submitted in advance of committee.

Yours Sincerely



Clare Lucey MRTPI

Associate, Development & Planning

For Cushman & Wakefield on behalf of Royal Mail Group Limited