



from the Joint Chairs:

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The Right Honourable John Prescott

Government Office for London

Riverwalk House

157-161 Millbank

London SW1P 4RR

for the attention of Alison Fairhurst / Dolly Contractor / Ken Bean

29 March 2006

Dear Mr Prescott

**London Boroughs of Camden and Islington: Planning Applications  
by Argent plc for development of the King's Cross Railway Lands  
(‘King's Cross Central’)**

We wrote to you on 6 March, summarising our strong objections to this application and urging you to call it in for your own decision following an independent public inquiry.

We have been campaigning for this land to be developed for nearly 20 years. A development here could make a unique and exemplary contribution to sustainable local communities, to London's needs, Britain's needs and indeed to the development of the wider European community – for which it will be Britain's gateway. We regret taking action which could further delay this essential project and we only do so because the current scheme is so bad and the weaknesses of the scheme have not adequately been considered under the procedures used by the local planning authorities to determine the applications.

On 9 March Camden Council's Development Control Sub-Committee resolved to grant permission. Islington Council's relevant Committee is scheduled to meet on 18 April. It would be wrong for you to make a decision based on Camden's determination alone: the proposals to put 246 dwellings on a highly unsuitable site in Islington (the Triangle) are an integral part of the scheme and if Islington LB were to reject those proposals the part lying in Camden would need radical re-consideration. The Planning Brief required **“A separate outline application for the Triangle is**

**expected to be made once developers have carried out further feasibility studies into possible development of this part of the site.”** This feasibility study has not been forthcoming. We strongly suggest that, irrespective of all the other issues involved, the decision on call-in should be deferred until Islington Council make their decision on the Triangle site.

Nothing that has happened since we last wrote reduces in any way the need for a public inquiry, indeed the need for it has strengthened. On behalf of all our individual members and the many groups whom we represent, we urge you most strongly to call this application in or, if you are undecided just now, to issue an Article 14 Direction to give yourself time to consider the issues fully.

Our grounds for this request are as above and as follows:

(i) We are concerned at press comment that the Treasury has an interest in the most profitable possible disposal of the railway lands in order to off-load the public debt held by London and Continental Railways. We feel this adds weight to our case that the objections – which must be heard by an independent body – can only be handled by the independent planning inspectorate.

(ii) There has been no consensus on the scheme. Camden's meeting was in many ways a travesty of proper procedure and the committee was split almost down the middle with votes of 8:7 and 9:6.

(iii) Regional: The impacts reach far beyond Camden and these wider considerations have nowhere been addressed. The proposals fall far short of the requirements of the regional spatial strategy (the London Plan) and we consider that the Mayor has disregarded the inconsistencies within the application. Specifically:

London Plan Policies 3A.7 and 3A.8 set a target of 50% affordable housing, within which 70% should be social and 30% intermediate. The total quantity of housing proposed by this application is low, especially in the light of the London Plan Monitoring Reports and the SRDF, so the affordable housing offered by this application is an inadequate percentage of an inadequate number.

Policy 3A.4 on Lifetime Homes Standards and wheelchair accessible housing.

Policy 5B.1 on King's Cross Opportunity Area proposes 11,400 new jobs, but here we have a proposal for 28,500 extra jobs based on floorspace of 16m<sup>2</sup> per employee (that is up to 455,510 m<sup>2</sup> of B1 office space). By comparison, 15,000 jobs would only require a total floorspace of 150,000 - 240,000m<sup>2</sup> (10m<sup>2</sup> - 16 m<sup>2</sup> per employee). The application outstrips the capacity of the existing transport network which is operating at or near capacity. Similarly the road network is heavily trafficked and congested. The Boroughs' Planning Brief correctly required that Developers should demonstrate that their proposals would not lead to any unacceptable impacts on the public transport and highway networks.

The Argent application is much less ambitious in terms of energy impacts than the London Plan. The London Plan Review will clearly be more ambitious still,

and the government's own attitudes to energy conservation are strengthening daily.

The application fails to conform with these aspects of the London Plan.

(iv) National: The development is in conflict with national policy for sustainable communities - rather than sustaining communities it will accelerate displacement of low- and middle-income residents (including ethnic minorities) and of small and medium enterprises. It makes virtually no provisions for housing, sporting, cultural or other community facilities which would meet local needs and thus threatens to establish a new luxury quarter alongside an established mixed community with virtually no sharing or contact. The small and medium enterprises of the locality have already been subject to massive displacement and the Argent scheme as it stands threatens to complete that process.

(v) Employment.

There is strong agreement throughout the consultation that the present proposals constitute grave over-development of the site and are seriously imbalanced in favour of office floorspace.

If the maximum amount of floorspace for major employment uses were granted - A1-3 (shopping, food and drink), B1 (offices), D1 and D2 (cultural, educational) - then the overwhelming majority of the total floorspace in this application would be taken up with employment type uses. To reduce the absolute scale of the development and obtain a more mixed, balanced and sustainable profile of land uses, the office component is the obvious candidate for reduction. The more business floor space provided, the less, within a finite total, is available for other uses (e.g. housing, community, leisure and recreation etc) all of which have commanded strong support and if anything most people would like to see increased.

There is evidence of current over-supply of office floorspace in central London and the West End. GVA Grimley (Central London Office Commentary) report, " at the end of Q4 (2003), the central London office vacancy rate had increased to 13.7% of total stock – up from 12.7% at the end of the previous quarter. A year ago the vacancy rate was 10.7% and two years ago it was 7.8%". Office working practices are changing dramatically ("hot desking" "virtual office", homeworking, "hotelling"). There is clear evidence from Gerald Eve (Consultants to the Mayor) that office floorspace ratios per employee, particularly in new large office schemes, are likely to come down from 16m<sup>2</sup> (net) to 12m<sup>2</sup> – 11m<sup>2</sup>(net). It is the use of the 16m<sup>2</sup> figure by Argent which has led to the scale and density of the proposed scheme.

These figures suggest an interesting link between density and mix of uses. Generally speaking, high density implies a high proportion of office space, because offices tend to be built more densely than flats or houses. Argent is proposing that the very highest densities should be pursued.

To put all this in perspective, the Planning Brief (SPG) for the King's Cross Railway Lands adopted by LB Camden in November 1994, in full knowledge of the St Pancras CTRL Terminal decision, but for a very much larger area of land, stated :- "Office development exceeding 150 - 180,000 m<sup>2</sup> is unlikely to be considered appropriate, to the extent that it would involve over-development of the site stemming from

- \* Tall buildings and dense massing having adverse consequences for the setting and character of listed buildings and the Conservation Areas, and for a satisfactory townscape with adequate permeability and open spaces
- \* Major office provision towards the north of the site requiring additional public transport infrastructure that would be a major cost to the development
- \* Restrictions on the availability of land for housing and industrial purposes, such that the objective of a fully mixed use regeneration relevant to local needs would be less attainable."

We are strongly of the view that there needs to be an independent examination of the economic case put forward by the developer

(vi) There are major architectural, urban design and historic building controversies surrounding the scheme, exacerbated by the (perhaps unprecedented) attempt to deal with Listed Buildings through outline applications which 'wash over' them. Issues of height and bulk, integration with surroundings and treatment of historic buildings and spaces are highly controversial. Although English Heritage has not objected, many others are strongly opposed on these grounds, including the statutory Conservation Area Advisory Committees.

(vii) Although there have been many months of orchestrated 'consultations', they appear to have been largely abortive with accusations and counter-accusations being levelled between developers, residents and other stakeholders. None of this argumentation has been tested by cross-examination and the Development Control Committee of Camden LB had to make a decision in only 2 evenings after having 2 weeks to digest a 900-page report.


(viii) Argent has applied to develop floorspace in a number of categories (854,045 m<sup>2</sup>) that adds up to more than the total floorspace for which they have applied. (713,090 m<sup>2</sup>). They have applied for the maximum they would like to be able to develop in each category of use because they want to be able to respond to changing market forces in different ways so they need options: the figures are therefore "up to" figures. In our view the planning authorities are wrong to grant permission in these terms because they are abrogating their responsibility to consider successive stages of development in the light of:- developers' performance in earlier stages, changing government policy and changes in the London context. We have argued throughout that this is an abuse of the British planning system

(ix) Cllrs were given no information about the status of the streets and open spaces. The arguments are now being played out in the national press (The Times on March 28<sup>th</sup>, The Guardian on March 29<sup>th</sup>) as to whether the public realm will be public or private space. This is critical in terms of sustainable communities, and scrutiny is required to ensure the problems caused at Canary Wharfe and Brindley Place are not repeated. This scrutiny can only be provided by a public inquiry.

There are other procedural failings too. Some are not issues of planning policy and might lend themselves better to Judicial Review or to examination by the European Parliament or Commission or by the courts under the Human Rights Act. We are convinced, however, that a decision based on a public inquiry would stand up much better to challenge than the one we are threatened with otherwise.

In short, this scheme is far too big and far too controversial and far-reaching in its impacts to be left to the local boroughs to decide.

Yours sincerely,

A handwritten signature in black ink that reads "Michael Edwards". The signature is written in a cursive, slightly slanted style.

Michael Edwards, Marian Larragy  
on behalf of the King's Cross Railway Lands Group

We should be grateful if you would send any reply electronically to either or both of us since our physical office is not regularly staffed.