

Hearing / Written Statement on behalf of KCCLP

Climate Change and the Environment

Issue 1: Climate Change

Question 3: How will the requirements of Policy CC2 affect the delivery of relevant allocated sites?

1. Kings Cross Central Limited Partnership (“KCCLP”) consider that the requirements of Policy CC2 will place unnecessarily onerous requirements on allocated sites at planning application stage which could in turn adversely affect the delivery of relevant allocated sites. For example, existing buildings on the St Pancras Hospital Site Allocation (S8) will have to be removed in order to optimise its development potential and enable a viable scheme. This has already been evidenced on the St Pancras Hospital Site allocation through the development on part of the allocation of the Moorfields Eye Hospital (LPA planning ref. 2020/4825/P) which resulted in the removal of all existing buildings within its planning application red line boundary.
2. KCCLP is undertaking pre-application discussions with LB Camden with regard to the redevelopment of the remainder of the site allocation area with a planning application targeted for submission in September 2026. The majority of the existing Victorian buildings on the site are proposed to be retained, however, all of the 20th Century buildings are proposed to be removed – as was the case with the Moorfields planning application. Unless these buildings are removed there is no viable or deliverable scheme.
3. Whilst the removal of existing buildings on the St Pancras Hospital Site Allocation will be subject to heritage considerations, such as the impact on the setting of the conservation area in which the site allocation sits, Parts B and C of policy CC2 introduce a series of onerous tests which will lead to unnecessary work and delay to the planning application process.
4. If there are specific buildings within a site allocation that the Council consider worthy of retention these should be identified and justified in the site allocation text and then further assessment can be applied. The St Pancras Hospital Site Allocation does this in the context section, identifying the *“east and west Hospital Wings and the Residence Building around the edge of the listed St Pancras Gardens as arguably the most cohesive and important collection of buildings on the site”*. It is proposed that all of these buildings are retained in the scheme KCCLP are preparing.
5. In addition, the Council’s adopted Canalside to Camley Street SPD (2021) identifies a series of new spaces and routes for the site which could not be realised without the demolition of the existing 20th Century buildings:



Figure 1 – Extract from Canalside to Camley Street SPD identifying the St Pancras Hospital Site

6. Whilst KCCLP understand why parts B and C of policy CC2 could be applied to speculative development involving existing buildings, they should not be applied to those site allocations which will deliver the majority of the borough's growth.
7. As such, the policy wording should be amended as follows (additional text in red):

Policy CC2 Part B:

*“Developers considering the substantial demolition of existing buildings **outside of the site allocations** will be expected to undertake the following assessments, before progressing detailed proposals for submission.”*

Policy CC2 Part C:

*“**Outside of the Site Allocations** ~~the~~ the Council will only permit proposals which include substantial demolition where it can be demonstrated to the Council’s satisfaction that.”*

Word Count: 574