

Hearing / Written Statement on behalf of KCCLP

Site Allocations and Area Based Policies

Issue 1: Site Allocations

Question 1R: Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period

1. Kings Cross Central Limited Partnership (“KCCLP”) are currently in pre-application discussions with LB Camden ahead of the submission of a planning application for the St Pancras Hospital site (Site Allocation – S8) in September 2026 for a comprehensive mixed-use redevelopment including housing, health, employment and ancillary town centre uses. It is expected that construction would begin in 2028 / 2029.

Issue 2: South Camden

Site Allocation S8 – St Pancras Hospital

Question 16: Are the uses identified for the site appropriate?

2. Yes, the uses identified for the site are appropriate and reflect those proposed by KCCLP. However, as set out in our Regulation 19 representations, the ‘Development and Design Principles’ include more active and engaging street frontages as well as the creation of new public routes. We fully support these principles. Key to the success of these routes and spaces is their activation with ground floor uses which are open to the public. To facilitate this, the emerging proposals for the site include ancillary ground floor retail as well as food, drink and leisure uses. The vital placemaking tool that these uses provide should be clearly acknowledged in the Allocated Use text.
3. In response to these representations, the Council stated in their Regulation 19 Consultation response:
“The site is not within a town or neighbourhood centre and it is therefore it not considered appropriate to make a specific reference to retail, food, drink and leisure uses as proposed uses. Any proposals for retail etc on the site will be considered against the allocation and all other relevant Local Plan policies.”
4. If policy IE6 (Supporting Designated Centres and Essential Services) was applied, a sequential test would be required to be undertaken for retail, food and drink and leisure uses. This is not appropriate or proportionate to apply to ground floor ancillary spaces within buildings that will mainly be comprised of residential, health or workspace uses. This is a significant site allocation that will create a new place in Camden. It is therefore a perfectly valid approach to include reference to ancillary retail uses as part of the allocated uses (proposed additional text in red):

“Health, permanent self-contained homes, education, employment (including research and knowledge based uses, light industrial, maker spaces, offices), ancillary retail, food and beverage and leisure uses.”

Question 17: Are the requirements of the policy justified and consistent with national policy?

5. The Site Allocation provides an ‘Indicative Housing Capacity’ of 200 additional homes. Through the pre-application discussion process with LB Camden officers, KCCLP and the design and consultant team are working to get as close as possible to that figure. However, it is not clear why Site Allocation S8 also states

under the 5th bullet point in the context section and in Development and Design Principle 3 that homes are prioritised over employment and non-health uses.

6. Most of the other South Camden site allocations which contain such a statement have the following wording (or similar) as a Development and Design Principle, which doesn't prioritise housing over other uses:

"optimise the provision of additional homes, having regard to relevant Local Plan policies including Policy H2, and the scale of all additional floor area proposed;"

7. We have not found anything in the evidence base to justify this specific approach for the St Pancras Hospital site and the wording quoted above from the other site allocations should also be used for St Pancras Hospital.
8. Our other comments on the requirements of the policy remain as per our Regulation 19 representations.

Question 18: Is criterion 4 of the policy necessary and effective and is it consistent with Policy D5?

9. No, criterion 4 of the policy is not necessary and effective. We note that a Main Modification is proposed to criterion 4, however this is still not consistent with Policy D5 or the National Planning Policy Framework (2024) ("the Framework"), it in fact takes the wording further away from what is set out in Policy D5. The proposed Main Modification states:

"Propose the following modification to Site Allocation S8 Criterion 4 - "be designed to conserve ~~or~~ and enhance existing heritage assets, including building, spaces and the adjacent St Pancras Gardens, recognising their contribution to the character of the conservation area, and seek to retain and restore buildings that make a positive contribution in accordance with Policy D5 (Historic Environment);"

10. This moves the wording even further away from being consistent with Policy D5. Nowhere in Policy D5 is the statement "conserve and enhance" made. Part A refers to "conserve and, where appropriate, enhance" [our underlining]. Parts C and M refers to "conserve or enhance" [our underlining]
11. Criterion 4 is also a "Development must" 'Development and Design Principle'. However, takes no account of the fact that Policy D5 and the Framework set out criteria for assessing and considering harm to heritage assets (i.e. parts D, S of D5 and paragraphs 214 – 216 of the Framework) taking into account public benefits.
12. Criterion 4 makes no provision for considering harm against public benefits and within such a short paragraph it can't be expected to capture the comprehensive set of considerations required for proposals being assessed against Policy D5 and the Framework. However, the summary that criterion 4 does provide misses fundamental points of D5 and the Framework. Policy D5 will always operate alongside the Site Allocation requirements, therefore unless there is a specific named heritage asset relevant to the site that criterion 4 is proposed to address, the criterion should be removed.

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