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**Subject: Granary Street Tree Works Objection** - Objection against proposed tree works (*planning application no. 2024/3795/T at St Pancras Hospital, 4 St Pancras Way, London NW1 0PE*), request for Camden Council to TPO the trees, and compliant on Camden's 'no objection' final decision determined prior to the 21 day statutory period.

Dear Sir/Madam,

I am writing to formally object to the planning application 2024/3795/T submitted by an agent on behalf of the manager of this land, concerning significant and unjustified works on the trees located at St Pancras Hospital, 4 St Pancras Way, London NW1 0PE. A single day after the application was registered and on the same day the application was first publicised on the Camden planning portal, a final decision was logged by Camden council with 'no objection to works to trees in Conservation Area'. **I respectfully object to this decision and request that Camden Council refuses this application in its current form and serves a TPO on these trees** given the trees have significant value. Any works carried out should be fully justified with proper documentation which is currently missing in the application, including ecological, bird, and structural evidence surveys. Furthermore, **I am concerned about the land developer's publicised long-term intentions to remove these trees and the council should ensure that any future development of this site preserves the trees** that contribute so much to the local environment and character of the area, while also considering the significant negative impacts pollarding, or later losing these trees, would have on vulnerable residents and pedestrians, as outlined further in this letter. **I am concerned that this application is an attempt to weaken the trees' ecological and aesthetic value so that future applications for the site's redevelopment may be granted more easily, allowing the trees to be fully removed under claims of reduced value.** I request that the council not permit any works that could be used in the future as justification for further degradation or removal of these valuable trees. This letter is set out in two parts, an objection to the proposed works and a formal complaint regarding the lack of public consultation.

The 2024/3795/T application proposes **extensive and unjustified** works to three London Plane trees and a Liquid Amber tree. Specifically, the application proposes:

- 3x London Plane trees: reduce/pollard the crown to the historic pollard points by removing between 5-8 metres of growth and to cut back from the building to give 1.5 metres clearance and to remove any dead wood. *The application claims the trees need to be reduced to stop damage to the roof of the adjacent building although upon visual inspection there is no evidence of this.*
- 1 x Liquid Amber: prune back from the building to give 1.5 metres clearance.
- *Please see photos of the relevant trees in the appendix photos to visualise where and what the trees constitute.*

The left image below shows the relevant Granary Street trees under threat of extensive and unjustified pollarding. The right image below shows Argent Related's publicised long-term intentions to redevelop the site and remove the valuable over-150 years-old trees. Do not be deceived by the single sapling tree they plan to re-plant along the footpath – this will not recover the invaluable ecological loss should their proposals come to fruition.



**Part I: I wish to object to the council's decision to allow the significant & unjustified tree works to the street trees of Granary Street and I request the council issue TPO status for the following reasons:**

1. Inaccurate Description of the Trees' Location:
  - The application misleadingly states that these trees are located in the "rear area," whereas they are effectively street trees clearly visible along Granary Street. The trees provide essential character to the streetscape, despite being set just behind a private wall. Their significant alteration or eventual removal would negatively affect the visual and ecological amenity of the conservation area, and this issue must be carefully considered as part of the council's obligation to protect conservation areas.
2. Protected Status within a Conservation Area:
  - These trees are located well within a Conservation Area, and their trunk diameters far exceed 75mm at 1.5m above ground level. Therefore, they are protected under Section 211 of the Town and Country Planning Act 1990, and their severe pruning or eventual removal should be scrutinized under the law.
  - Moreover, these London plane trees are Category A, as identified from older tree surveys conducted by AECOM on behalf of the Oriel Eye Hospital's former applications. These surveys confirmed the trees are of high quality and value. Suspiciously, this key fact is missing from the current planning application, despite its importance in determining the significance and protection level of the trees.
3. Ecological & Environmental Value:
  - These trees are over 150 years old and provide vital ecological benefits.
  - They are of rare and rich ecological value to the area and exceed the quality of many other street trees in the area.
  - These trees also form part of an important green link that connects Regent's Canal to St Pancras Gardens and Camley Street Nature Park. They provide an urban cooling effect, helping to mitigate the heat island effect, and play a vital role in maintaining biodiversity across the area.
  - Furthermore, these trees appear to be in fantastic health, with no visible signs of disease or damage. I have included photos in the appendix as evidence to demonstrate their current

excellent condition. Given their robust state, any claims that their significant reduction or eventual removals is necessary should be thoroughly investigated.

4. Birds Nest in These Trees Year-Round:

- The trees are home to nesting grounds for local wildlife.
- The area's residents observe that these trees are particularly well-used by a rich variety of birds, with numerous nests observed year-round. The application, however, has not included a bird survey to properly assess the impact of the proposed works on local bird populations. Given the frequent bird activity and the significant pollarding proposed, a survey is crucial to ensure that this valuable habitat is not irreparably harmed.

5. Absence of Evidence the Trees Cause Structural Roof Damage to the Adjacent Building:

- The applicant has not provided any substantive evidence, such as a structural survey, to demonstrate that these trees are causing any roof damage to the adjacent building. It is plainly visible upon a walk around and observation from the adjacent resident's shared roof deck that the building in question is not visibly damaged by these trees, and any suggestion that the trees are causing harm appears speculative at best, if not deceptive. A detailed structural survey should be required to justify such significant tree works.

6. Negative Impacts to Existing Residents Following the Proposed Works to the Trees:

- If the proposed significant pollarding is approved, there will be immediate negative impacts on the existing residents in the surrounding area. These include:
  - Increased Wind Speeds: The pollarding of the trees will remove a vital natural windbreak, leaving the area exposed to dangerously high winds. The predominate south-westerly winds already cause problems in the area, with witnessed reports of balcony furniture being blown around (sofa cushions on private terraces in Enclave often fall to street level). Removing this natural protection will exacerbate these issues and create hazardous conditions for residents.
  - Increased Solar Gain: The trees provide important shade from the afternoon sun to the adjacent homes with no comfort cooling, particularly during the hottest months of the year - while still allowing dappled natural daylight through. Without their full canopy, homes will experience increased solar gain, making the interiors hotter and more uncomfortable. Some of the residents affected are bed-bound as is and such discomfort is life-critical.

7. Concern Over Long-Term Intentions to Remove these Trees:

- The application appears to be part of a longer-term strategy by the land developer, Argent Related, to facilitate a future redevelopment of the site without these trees. From the public consultation plans circulated by Argent Related regarding their long-term redevelopment proposals on this site (<https://stpancrashospital.com>), they propose to kill the three London Plane trees and replace them with a new and overdeveloped residential building. This new building is proposed to be just 14.5 metres away from the existing residential blocks at Enclave —an inadequate setback that is non-compliant with Camden and GLA design guidance. Furthermore, Argent Related proposes projecting balconies that would be only 13 metres away from the existing Enclave residential block, a completely insufficient distance to ensure adequate privacy, complaint daylight levels, and suitable wind speeds.
- I am concerned that this application is an attempt to weaken the trees' ecological and aesthetic value so that future applications for the site's redevelopment may be granted more easily, allowing the trees to be fully removed under claims of reduced value. I request that the council not permit any works that could be used in future as justification for further degradation or removal of these valuable trees.
- Should these London Plane trees ultimately be removed and replaced by a new residential building, the long-term impacts on existing residents, future residents, and future pedestrians would be severe and include the following:
  - Negative Impacts to Existing Residents
    - Increased Wind Speeds: The removal of the trees and the placement of a new building so close to an existing building will together create a wind tunnel effect with no trees to help mitigate, further intensifying wind speeds and creating a more dangerous environment for residents and pedestrians. The environment along Granary Street is already windy and we should think about the wind speed gains near the proposed future Tribeca bridge over Regents Canal.
    - Significantly Reduced Natural Daylight/Views to Sky: The proximity of the proposed building where the current trees now sit will significantly reduce natural daylight in the homes of existing residents. Many of the affected flats

- are single-aspect homes, and the loss of trees combined with a new residential building located so close will lead to drastically lower levels of natural light, unlikely to comply with the BRE guidance or case law.
- Loss of Privacy and Overlooking: With such a small setback between buildings, the proposed new building will create significant privacy issues for existing residents. Overlooking from the new building's balconies and windows will be a serious concern, reducing the quality of life for current occupants.
  - Acoustic Reverberation: The close proximity of the proposed building block will likely exacerbate the already loud train noise between the buildings, especially without the dampening effect of the existing mature trees.
  - These impacts are particularly concerning for many vulnerable residents living in homes looking across these trees, including families in social housing and disabled individuals, who cannot easily relocate if their living environment becomes intolerable. Many residents in social housing are unable to move due to housing allocation by the government, and transferring to another flat can involve years on a waitlist. Additionally, several disabled individuals live in the flats that look across these trees and spend long periods bed-bound. Their access to daylight and privacy directly depends on these trees. The trees provide crucial protection for their quality of life, and their removal would result in a significant degradation of their living conditions.
  - Negative Impacts on Future Residents
    - The proposed design for the new building also raises concerns for future residents of Argent Related's own proposed residential building, who will experience similarly poor levels of daylight, privacy and inadequate separation from the existing residents. Argent Related's plans for the building that replaces these trees is setback less than 8m from another proposed tall building to its west - woefully inadequate and of a density unprecedented in this area. They simply will not comply with the BRE's daylight guidance or case law. Their solution will be to locate one sensible building setback from highway like the Enclave building, which will save the trees. They can negotiate the appropriate building height under this solution with the public, council, and relevant stakeholders.
  - Negative Impacts on Future Pedestrians, Including Blind and Disabled Individuals
    - In the long term, should these trees be killed and a new building constructed right up against the already narrow footpath, significant safety risks will be introduced. The existing footpath along Granary Street is dismally thin and adjacent to a vehicular carriageway that is already too narrow to accommodate the current flow of traffic safely. Large vehicles, including lorries that use Granary Street to access the industrial units of Camley Street, frequently cross over the footpath, and any additional narrowing caused by redevelopment will exacerbate these problems. Furthermore, future construction vehicles for any Camley Street redevelopment will rely on this road, compounding the issue. Lorries are already regularly smashing into bollards, highlighting the unsuitability of the road for increased traffic.
    - Collisions with cars is of particular concern for blind and visually impaired pedestrians who will use the Granary Street footpath to access the future Oriel Eye Hospital. Argent Related's long-term proposal to extend a new footpath into the road is a sneaky land grab and unsafe, as the carriageway is already too narrow to accommodate the existing traffic. The thin footpath along Granary Street will become even more hazardous for all walking from King's Cross Station to the Oriel Eye Hospital and Tribeca community, placing them at risk of collision with large vehicles, building doors, and other pedestrians (including those with prams or in wheelchairs).
- My fellow community members share great concern with the long-term intentions of Argent Related's redevelopment along Granary Street and the relationship of this significant and unjustified tree works application to the developer's redevelopment intentions to remove these trees. This concern has been captured in numerous consultations with councillors, meetings with the developer, and the change.org petition where there are 1,058 signatures objecting to the future development proposals in their current form. See signed petition here for context: [https://www.change.org/p/help-evolve-the-st-pancras-hospital-development-plans?source\\_location=search](https://www.change.org/p/help-evolve-the-st-pancras-hospital-development-plans?source_location=search)

8. Lack of Transparency and Potential Misrepresentation:
  - The application lacks transparency, particularly in the absence of the required ecological, bird, and structural surveys. This, combined with the misleading description of the trees' location and the unjustified significant reduction in crown size, suggests an attempt to underplay the importance of these trees in the broader development context. We urge the council to take these concerns seriously and request full and detailed documentation justifying the works.
9. Conclusion:
  - In light of the above, I respectfully request that Camden Council refuses this application in its current form and that the council serve a TPO on these trees as they have significant amenity value. Any works carried out should be fully justified with proper documentation, including ecological, bird, and structural surveys. Furthermore, the council should ensure that any future development of this site preserves the trees that contribute so much to the local environment and character of the area, while also considering the significant negative impacts immediately and long term on vulnerable residents, including families in social housing, disabled individuals, and future pedestrians using the already too thin footpath of Granary Street to access the Oriol Eye Hospital and Tribeca community.

**Part II: I wish to submit an official complaint regarding the lack of public consultation on the tree works application. My complaint is outlined below:**

1. The public consultation process and period has not been not adhered to and the pre-mature decision under-appreciates the actual intentions of this application.
  - The council's 'no objection' final decision was made the day after the application was registered and on the same day the application was first publicised on the Camden planning portal.
  - The application was registered September 9th 2024, yet the application online says comments will only be taken until September 6th 2024. On September 10th 2024, the first day the application was publicised on the Camden planning portal, the council had already made a final decision that day concluding 'no objection to works to tree(s) in CA'. Yet it says on the website:
    - The statutory requirement for consultation on planning applications is a minimum of 21 days. The online comments form is linked to the statutory time period and will close after this time. If the online comments form has closed, you can still comment via email to [planning@camden.gov.uk](mailto:planning@camden.gov.uk)
    - We will take account of all representations received right up until an application is determined.
    - Please note that if the Comments Until date shown is before the Application Registered date this is because either:
      - we are not required to consult on the application (you can check this in our 'Statement of Community Involvement' link); or
      - the formal consultation period has not yet started by the application being advertised in the local newspaper or site notice(s) being put up at the application site.
  - Camden Council's Statement of Community Involvement July 2016 notes that they are required to follow the statutory notification methods of either a Site notice or Camden's website, either active for 21 days. Furthermore, the Statement list the types of applications where the council are not required to consult. The application for significant works to trees with a Conservation Area does not align with the descriptions of exceptions. In fact, it mentions that details for conservation area would be subject to statutory consultation.
2. The Need to Consult on This Application:
  - For significant works to trees in conservation areas, it would generally be expected that some form of public consultation takes place, especially as the trees are in a prominent street location and have been proven to have considerable value in tree surveys.
  - It seems at this time, Camden Council have chosen not to object to the tree works, signifying they are treating this application as an internal decision through delegated powers. However, treating this application as one that does not require public consultation would be unusual for significant works to trees in a conservation area. It is concerning that public comments were not considered prior to the decision.
  - The quick and internal decision that has been made undermines the public's opportunity to voice concerns, especially given the ecological and environmental significance of these trees.

- Camden Council should consult with the public on this application due to the severity of works proposed and due to the nature of impact on ecology and citizens by this application's proposal, as outlined previously in this letter.

In conclusion, it is imperative that citizens put forward their utmost care and attention to the natural environment and act as stewards of what is right and what is wrong – essential in 2024 when our natural world is under increasing threat. **This application is clearly a dubious attempt to pave the way for overdevelopment in the near future. Please help us save the trees that otherwise have no voice.**

Thank you for considering my objection and compliant.

Yours Sincerely,

Local Resident

## Appendix: Figures

Figure 1 (Relevant Tree Location Map):

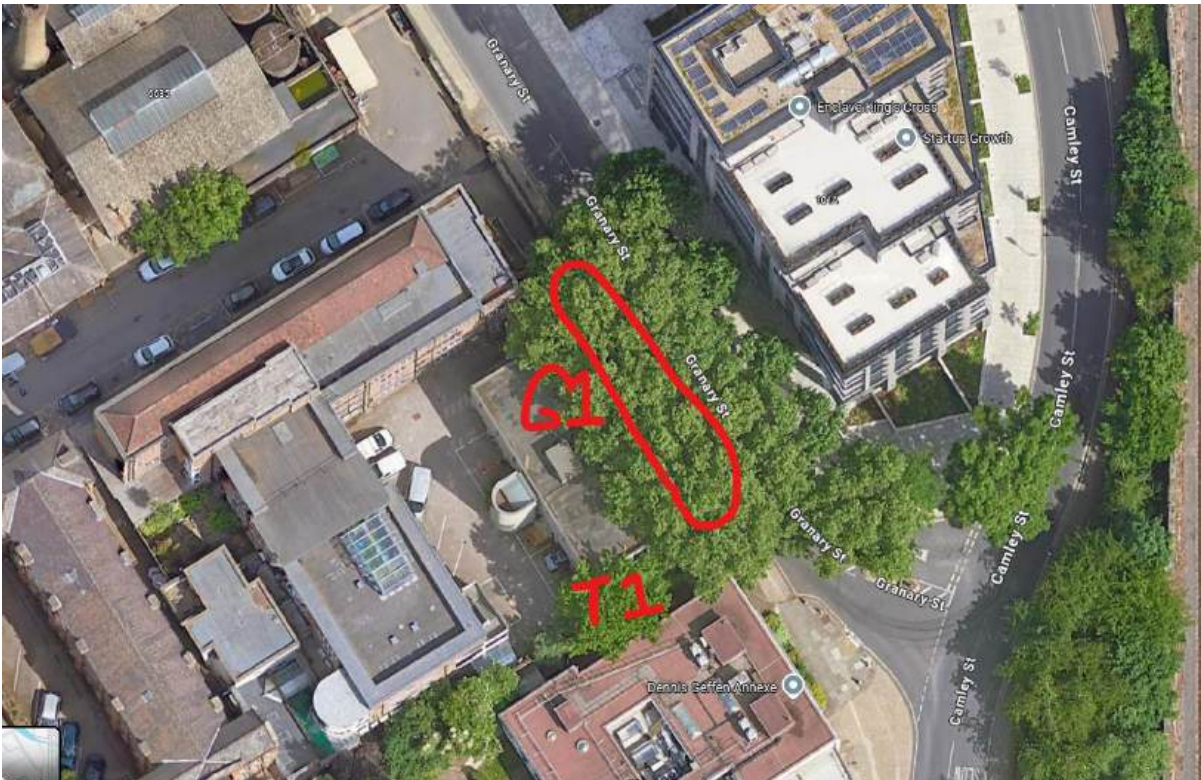


Figure 2 (Trees are of Category A high quality and value):

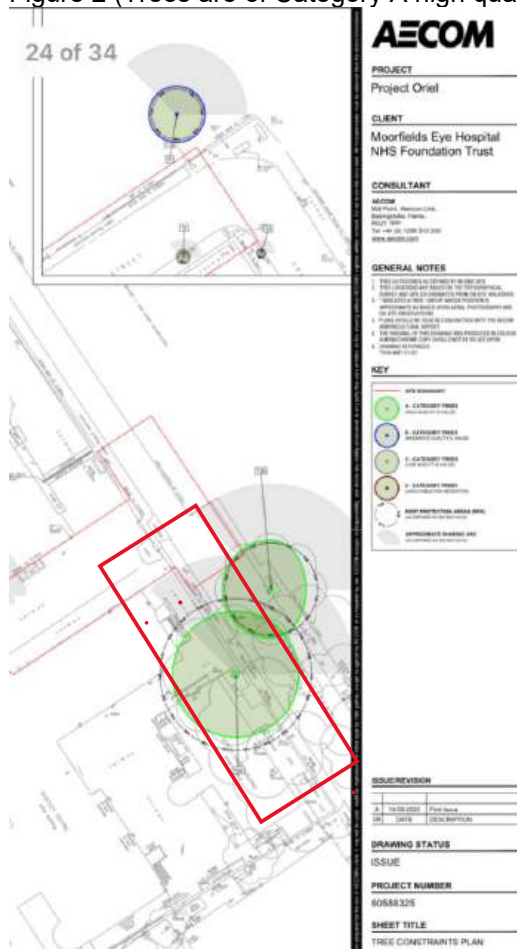


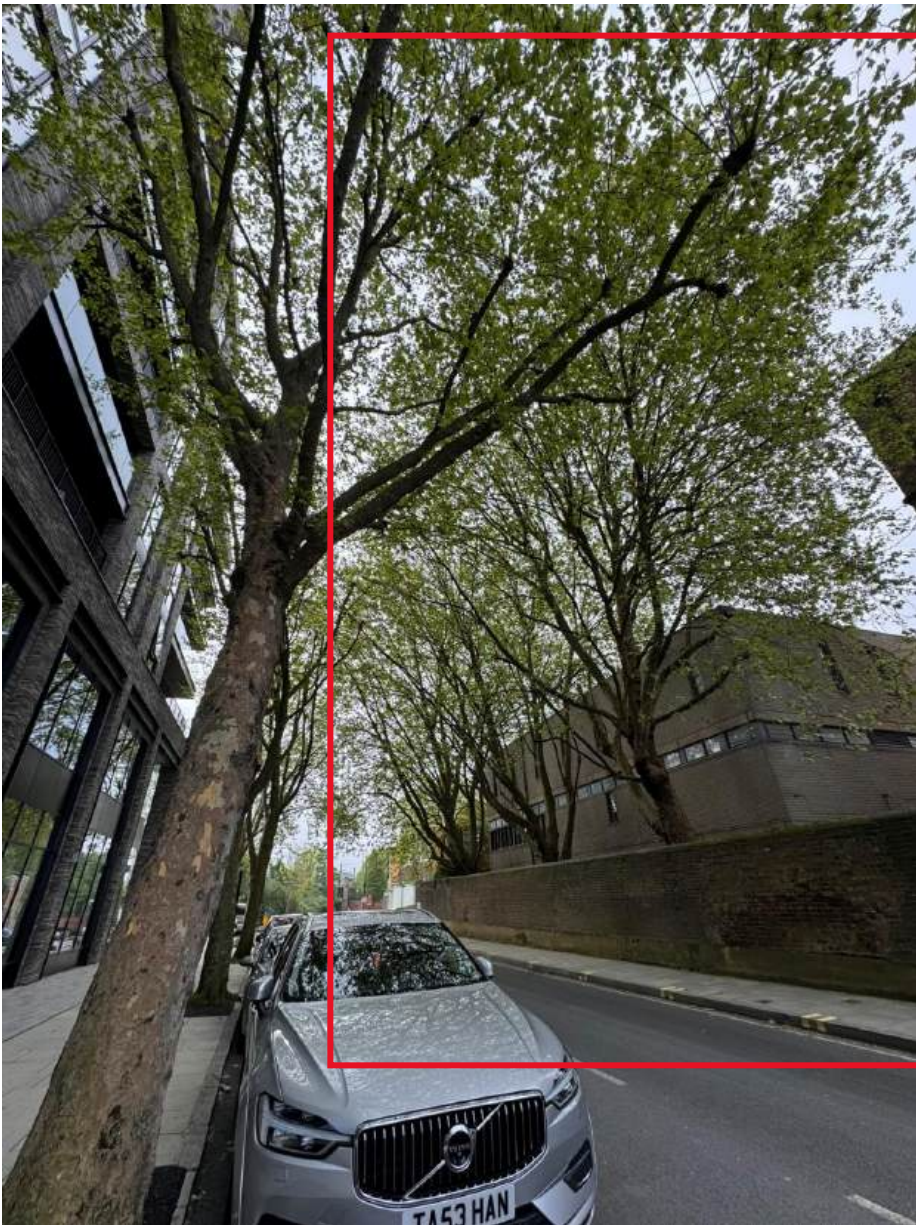
Figure 3 (The Liquid Amber Tree impacted):



Figure 4 (The 3 London Plane Trees impacted):







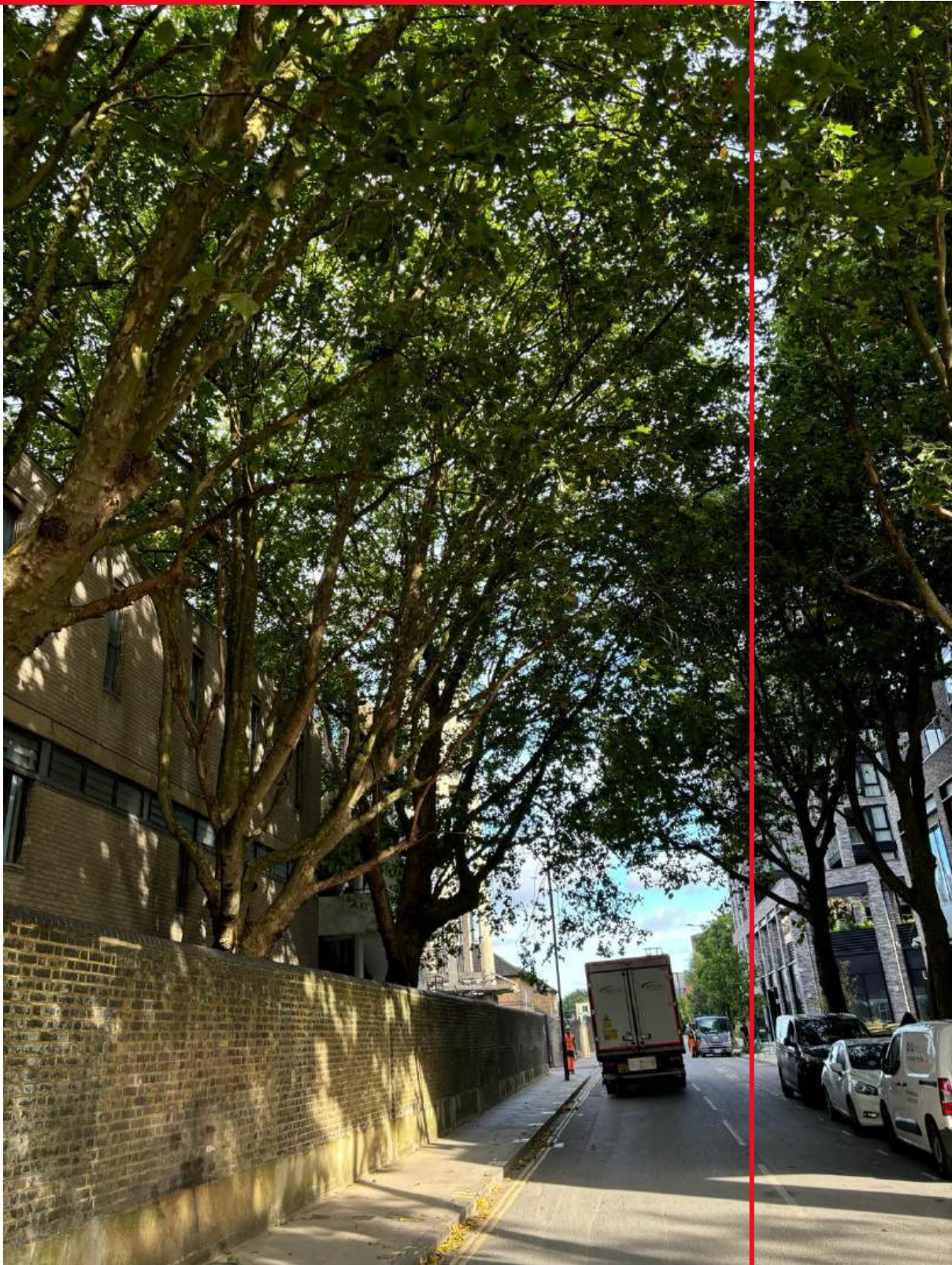




Figure 5 (Birds nesting in the London Planes all year round):









Figure 6 (The trees form part of a green link connecting Camley Street Nature Park to St Pancras Gardens to Regents Canal):

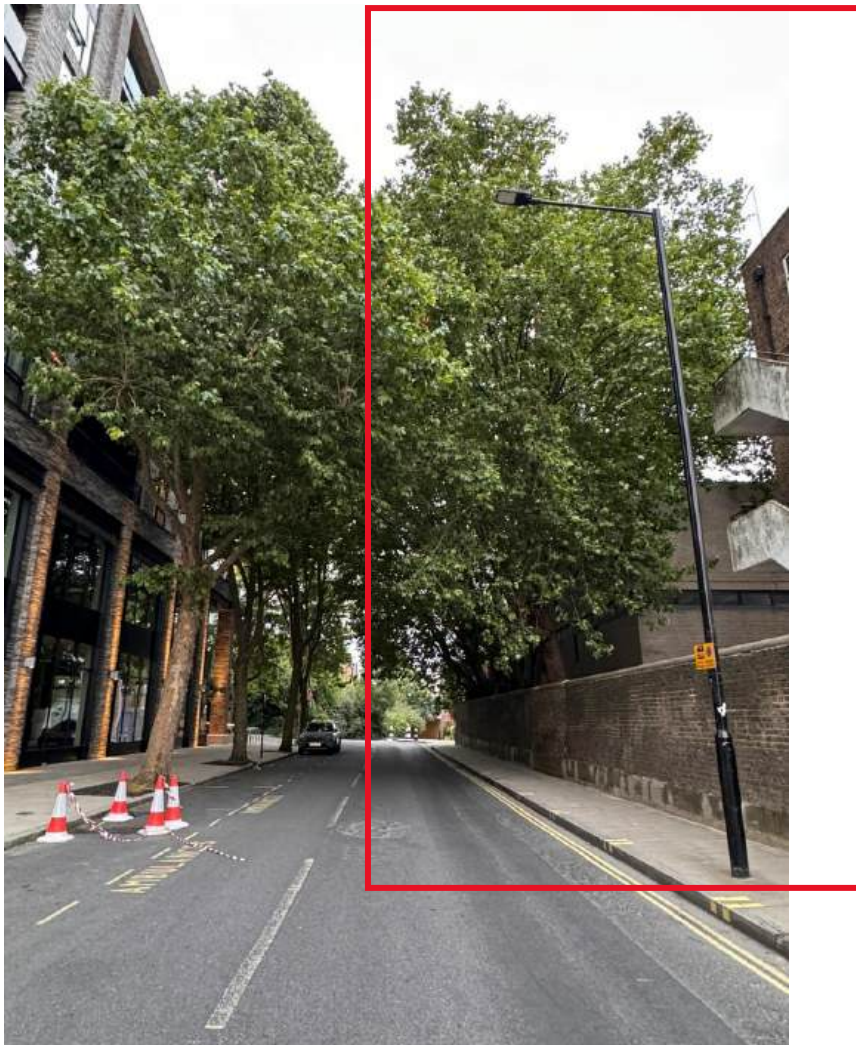


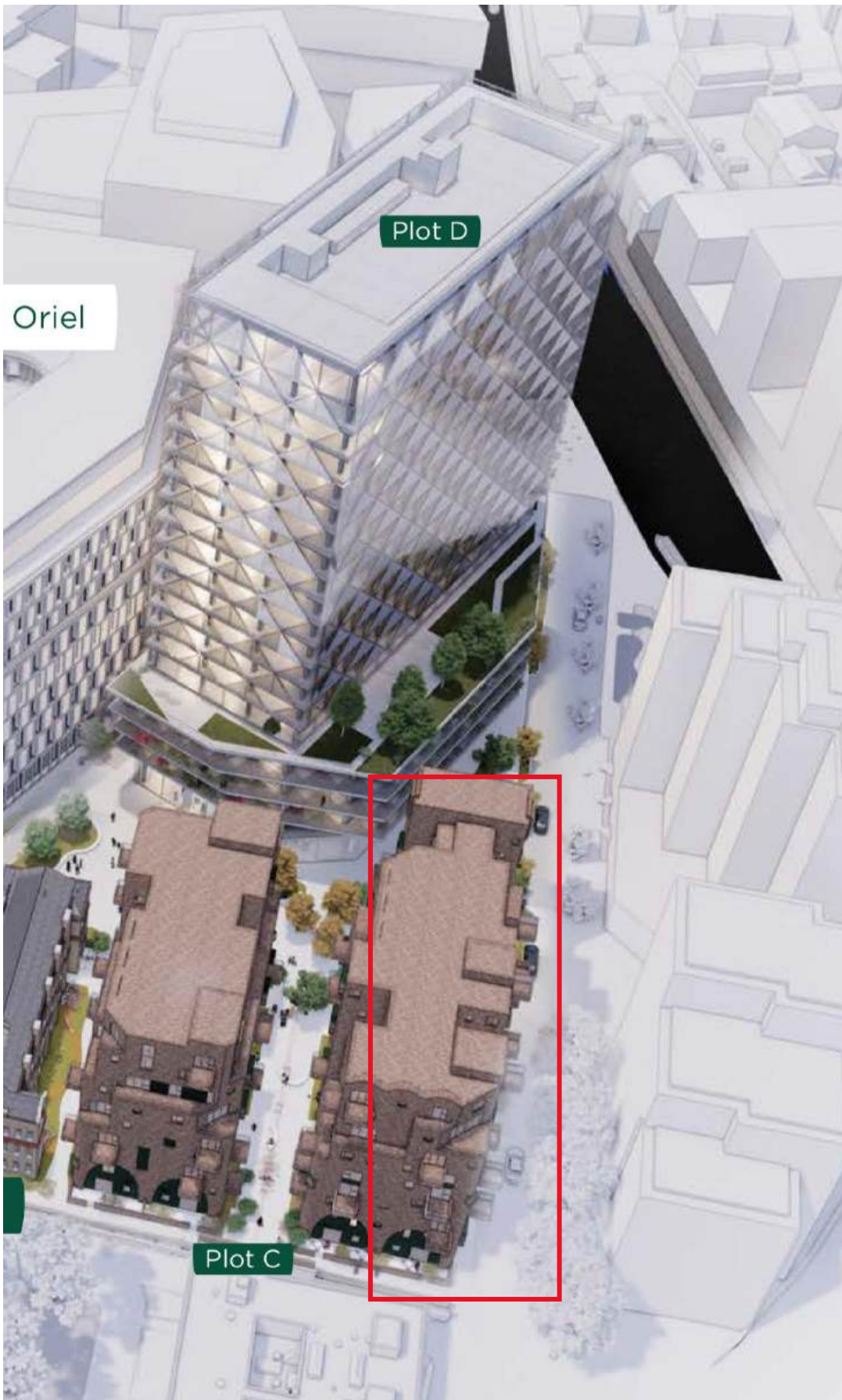




Figure 7 (notice the thin 1.7 metre wide footpath. The developer's long term proposals are to remove these trees and locate their new building where the brick wall is located in this photo. This setback is inadequate and all other recent development setback 5 metres or greater from the carriageway. If the developer were to setback similar to all other recent development, the trees would be saved and pedestrians would be safe. Note this footpath is how blind citizens will walk to the Oriel facilities and how the Tribeca community will access Kings Cross Station – countless footfall):



Figure 8 (Argent Related's public consultation proposals for locating Plot C on top of the trees, requiring their unduly removal):



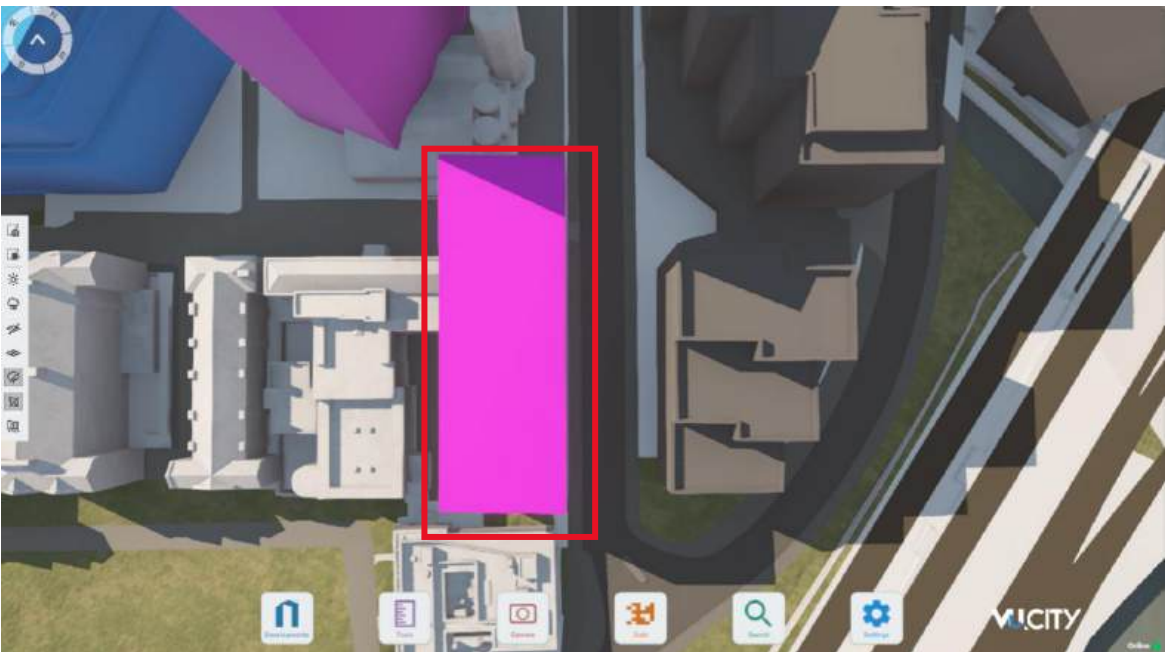


Figure 9 (residents call to action):

