



From: Richard Simpson [REDACTED]
Sent: 13 August 2017 06:58
To: Planning
Subject: Morrisons application Camden Goods Yard 2017/3847/P Advice from Primrose Hill CAAC and from Regent's Park CAAC
Attachments: Advice from RPCAAC Morrisons 2017.pdf; PHCAAC Advice Morrisons August 12 2017.pdf; Barratts Morrisons PHCAAC letter March 2017.pdf; Barratt letter December 21 2016 rv2.pdf

I attach 4 files

3 from PHCAAC, 1 main advice + 2 appendixes of pre-app advice

1 from RPCAAC

many thanks,

Richard
Chair PHCAAC
Chair RPCAAC

ADVICE from Primrose Hill Conservation Area Advisory Committee
12A Manley Street, London NW1 8LT

9 August 2017

This advice consists of 4pp + 5pp of appendixes

Morrisons Store and Petrol Station, Chalk Farm Road, NW1 8EH 2017/3847/P

Strong objection.

1.0 Process

1.1 The PHCAAC has taken part in 3 full pre-application meetings with the applicants. While the PHCAAC was identified by the applicants as a 'key-stakeholder' (Applicants' 'Statement of Community Involvement' p. 7), and our meetings are correctly listed, the PHCAAC's attendance at those meetings is inaccurately reported (significantly understated), and their reports of our concerns are substantially incomplete.

1.2 The PHCAAC has a considerable experience of pre-application discussion. We were profoundly disappointed by the pre-application process in this case and the lack of response to our carefully argued concerns. For example, we received no written response to our two detailed letters. (Attached). Our 'Community involvement' was at best very one-sided. Claims that the proposals are a response to local concerns fails to explain that the proposed solutions, where presented to us, were not acceptable.

1.3 The PHCAAC has discussed this advice on the formal applications at meetings on 19 July and 9 August 2017. We also held a well-attended public meeting in the Primrose Hill Community Library on 2 August 2017 to discuss the application and our responses to it.

2.0 Archaeology

2.1 We were told by the applicants in the course of pre-application discussion that there were no archaeological survivals of significance on the site. We must assume that the designs were prepared on that basis.

2.2 We note the very different conclusions of the 'Archaeological desk-based assessment' at pp. 21-22, where it is explicitly stated (6.8) that 'The proposed development has the potential to have a localised severe archaeological impact on industrial archaeological remnants through the cutting of basements, footings and services.'

2.3 We note that Historic England records (in the List entry to 1258100) the Camden Goods Depot, which includes the application site, as 'one of the most complete groups of C19 railway buildings and associated canal structures in England.'

2.4 We advise that, because of this exceptional status, and the apparent working assumption that there were no significant archaeological survivals, the archaeological investigation should be completed before any consents are granted. This would help ensure that the results of the investigations could be properly assessed, and survivals, where appropriate, incorporated into a new scheme. Under the specific circumstances which emerged from our pre-application discussion, we advise that to grant consent for the present scheme before archaeological investigation is complete would put the integrity of this 'most complete group' at risk. This would create a potential threat of substantial harm to a heritage asset.

3.0 Open spaces and anti-social behaviour

3.1 Despite our explicit concerns in our pre-application responses that the provision of open space on the site would be a location for anti-social behaviour, this concern has not been addressed effectively in the applicant's proposals. Our public meeting on 2 August heard detailed accounts of anti-social behaviour in the neighbouring areas now, and its harmful effect on the life of local residents. We wish to emphasise that the 'active streets', ground-floor overlooking, and other design solutions which work well in areas like King's Cross, are not necessarily effective in this area, given the character and hours of operation of the night-time economy.

3.2 We note that Camden's recently adopted Local Plan at Policy C5 'Safety and security' states that 'The Council will aim to make Camden a safer place.' The present proposals are not consistent with this admirable objective. The objectives of provisions of C5b-e are not met.

3.3 We fear that, if not addressed effectively now, the area will join other pseudo-public spaces in London, and be subject to controls which would further isolate this area from the local community, and counter its creative industrial activities.

4.0 Living conditions

4.1 We are concerned that the new housing proposed should be used for full-time occupation, and contribute to meeting Camden's well-recognized housing needs. We are, therefore, worried that the close proximity of high blocks, like the 2 blocks A, Block B and Block F will lead to housing conditions which will militate against long-term occupation. The quality of units, including size, influences whether they have a long-term use as family housing or are merely an opportunity for investment or a dormitory for the transient visitor. For example: proximity will allow over-looking of habitable space – we estimate that some spaces between buildings are only 14m. We are also concerned by the natural lighting, including sunlight, achieved. Camden's Local Plan states, at p. 40 at 3.1, 'Living in satisfactory housing conditions is a key element of quality of life.' We are not convinced that this is achieved in all proposed units.

5.0 Traffic, access, and air pollution

5.1 We are very concerned by the potential use of Oval Road as a vehicular access to the site. The pedestrian and cycle access at present gives an appropriate emphasis to 'active travel', as sought by the Mayor, while also reducing pressure for the vehicular use of Oval Road. Vehicular access via Oval Road would also increase air-pollution in close proximity to housing.

5.2 We are also concerned that the configuration of the site will mean that deliveries – of increasing importance as shopping moves on-line – will have to pass across areas outside family homes.

5.3 At the same time, there is a lack of clarity on how restricted vehicular access within the site will not disadvantage the disabled, families with small children, and the less-mobile.

6.0 Heritage issues

6.1 We have argued consistently that the proposals would be substantially harmful to the heritage assets which surround the site. In March we wrote (our para 7) 'In our para 5 on 21 December we argued that the scale of the proposed high buildings would destroy one of the key characteristics of the area, which is that the historic industrial buildings are dominant. This is partly a matter of the scale of the historic industrial buildings, but also their forms and roof lines. Both the Interchange Building and the Roundhouse have instantly recognizable, iconic forms. They give real character and identity to the immediate area. This is key to the significance of the area and of its relationship to

the surrounding areas and to the range of heritage assets they include. This significance would be harmed by the present (March) proposals. In our view the heritage assets should be celebrated as giving unique value to the area.'

6.2 We sought a creative dialogue with the applicants: unfortunately the response was a rhetorical justification, which we found unconvincing.

6.3 Since March, Camden has adopted the very welcome 'Camden Goods Yard Planning Framework'. We note a number of its objectives in respect of the present application.

6.4 The Chalk Farm Road and 'Camden wall'. We think that the 'Framework' states (p. 48) 'Particular consideration will need to be given to the level of enclosure created by any development, ensuring that it is sympathetic to the surrounding urban form and character and the listed wall.' The proposed new building on the Petrol Station site substantially fails this test. It dominates the Wall – which here should set the scale for the street – and even dominates the railway viaduct behind, which also sets the traditional scale of the area. In terms of the Listed Wall, the proposed Petrol Station building, by its sheer scale, trivialises the Wall. The proposals substantially harm the historic significance of the Wall as the surviving enclosure of this exceptional grouping – 'one of the most complete groups of C19 railway buildings and associated canal structures in England.' (see ref at our 2.3 above).

6.5 Interchange Building. We have consistently argued that this major building, with its iconic tower, should remain the dominant form at this end of the site. The 'Framework' states (at p. 52) in relation to the Interchange that proposals should 'Be informed by the historic significance of the area as a Goods Yard. New and adapted buildings should respect and enhance the setting of listed buildings and structures.' The proposals offer some limited immediate tidying up of the area around the Interchange, but then overwhelm it with new buildings, again trivializing its scale and significance in the new hierarchy of building which the present application proposes. The proposals substantially harm the significance of the Interchange building.

6.6 Roundhouse. Again, we have argued, and the 'Framework' states (p. 47), that 'The Roundhouse is a major landmark and focal point in architectural, townscape and cultural terms ...'. The 'Framework' goes on to state that development should 'Take the opportunity to enhance the setting of the Roundhouse, the Stables market and the listed historic wall. ... Development should also be sensitive of important local views.' The application, by its sheer scale and bulk, diminishes rather than enhancing all the heritage assets noted here. It fails this test.

6.7 Primrose Hill conservation area. The 'Framework' restates the duty on the local planning authority to seek to preserve or enhance the character and appearance of the conservation area, noting (at p. 58) the setting and views from the Primrose Hill conservation area. It is clear that identified views, along Edis Street, Princess Road, and across the Canal bridge on Gloucester Avenue, will be neither preserved nor enhanced, but interrupted and dominated by the new development. The proposals undermine the careful work of Camden and the community in protecting the roofline in the conservation area since designation in 1972.

6.8 The Advisory Committee would argue that, while in some instances, the harm to heritage assets is less than substantial, in major cases the harm is substantial, and further, that, viewed as a whole – from Regent's Park to Primrose Hill, to Haverstock Hill, and the Chalk Farm Road, the cumulative harm to heritage assets caused by the sheer scale and mass of the application is substantial.

6.9 We see no exceptional public benefit – beyond the requirements of planning policy – which would outweigh this substantial harm.

6.10 We also continue to argue that, given the scale of the Morrison’s site, there are opportunities for high-density medium-rise development which would provide substantial development without causing harm to local heritage assets.

7.0 Other issues

7.1 Were the application to be approved, and occupied, there would be need for local services like a GP surgery.

7.2 Construction Management Plan. Monitoring offered in the CMP is inadequate.

Richard Simpson FSA

Chair PHCAAC

Advice from The Regent's Park Conservation Area Advisory Committee

12A Manley Street London NW1 8LT

7 August 2017

Morrisons Superstore and Petrol Station Chalk Farm Road NW1 8EH 2017/3847/P

1. The RPCAAC objects very strongly to the application on the grounds that the proposals would cause substantial harm to the Regent's Park Conservation Area and to the Registered Park.
2. The harm would result from the visibility of two towers from within the Park as shown in the applicant's view 10.
3. This view is of exceptional significance in the history of the Park. This advice first addresses the status of the Park and the significance of this view, then identifies the impact of the application on the Park, and finally assesses the nature of the harm to the heritage assets.
4. The Regent's Park is a national heritage asset of international importance. It is included on the Register of Historic Parks and Gardens at Grade I, the highest grade. One factor in the international status of the Park is that it represents an early example of a planned urban area which was consciously designed as part of parkland, with views within and beyond the Park area as part of the developed plan. These views were an essential element of the design. The whole, Camden has formally recognized, 'comprises a unique planned composition of landscape and buildings'.¹
5. In the case of the view to the north – the view we are concerned with here, and shown in the applicant's View 10 – historical evidence demonstrates its major significance in the 'unique planned composition'. The evidence summarised here is taken from the history included in Camden's *Regent's Park Conservation Area Appraisal and Management Strategy*, formally adopted 11 July 2011, at pp. 85-86.
6. Recognition that the views to the north were of the highest importance led to changes in John Nash's original plan for this section of the Park.
7. In his 1810 scheme, Nash had planned to construct a Barracks on the north side of the Park. In 1811, under pressure from the Prime Minister, Spencer Perceval, Nash agreed to reduce the number of buildings and increase the extent of parkland. The routing of the Regent's Canal through the north of the Park in 1812 provided an opportunity and made possible a view to the north. As Nash himself put it, he created a 'wooded valley, with its water in front and the hills of Hampstead and Highgate behind'.²
8. In 1826 the priority to be given to the landscape of the Park, and especially the view to the north, was formally endorsed by the Commissioners. They reported that the character of the parkland and its associated views were of sufficient importance to lead them to abandon plans for more building. They singled out the view to the north as of major significance:

'... the carrying into execution, to their full extent, the original plans for occupying so much of the ground, and particularly in the interior of the Park, by building, would so far destroy the scenery, and shut out the many beautiful views towards the villages of Highgate and Hampstead, as to render it very advisable to reduce the number of sites to be appropriated for villas, and also to leave open the northern boundary of the estate, formerly intended to be built upon ... [the Treasury] ... have desired

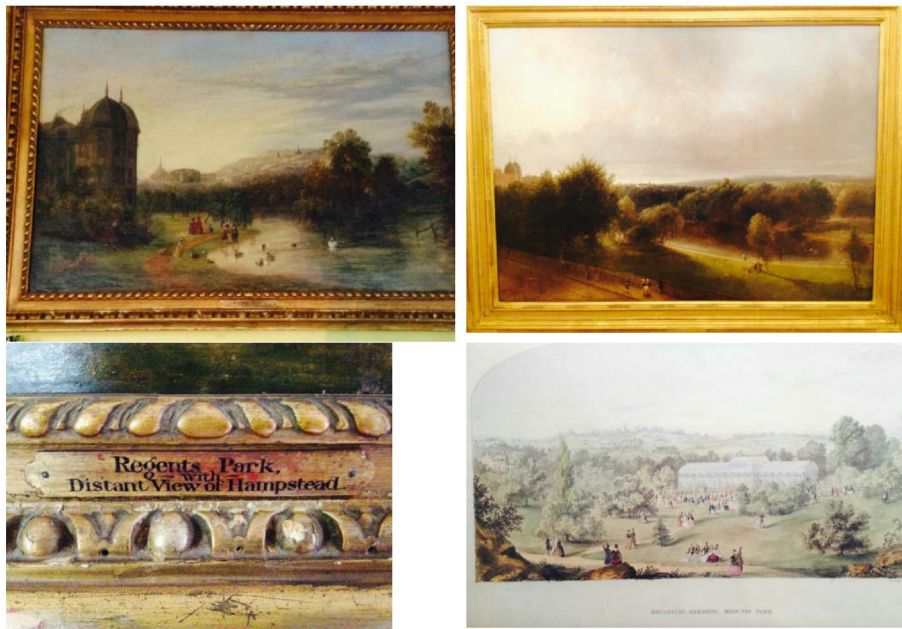
¹ *Regent's Park Conservation Area Appraisal and Management Strategy*, p. 5.

² Nash to the Commissioners, 31 August 1812, TNA CREST 6/119 vol. 25.

that there may not be any extension of buildings northward ... According to this decision ... the ground along the banks of the Regent's Canal, on both sides, will be continued in plantations and shrubberies.³

9. Contemporary accounts confirm the wider recognition of these views. Writing in 1818, Henry Crab Robinson described a ride to Regent's Park, which he hadn't seen before. He commented on the landscape features, singling out the views to the north: 'The heights of Highgate and Hampstead Hill is a beautiful object, and within the park the artificial water, circular belt or coppice, the bridges, the few scattered villas etc are objects of taste.' He added, more generally, a striking comment on the Park as a monument to his times: 'I really think this enclosure with the new street leading to it from Carlton House will give the sort of Glory to the Regent's government, which will be more felt by remote posterity than the victories of Trafalgar and Waterloo, glories as these are.' Written 3 years after the Battle of Waterloo, this witnesses vividly to the historic significance of the Park and its views.

10. Recognition of these views is also witnessed by contemporary artists who celebrated it in paintings and engravings. We illustrate two of these. We are grateful to the private owners for allowing us to use these images.



11. The view to the north can be demonstrated to be both a carefully considered element in the developing historical design of the Park, and one judged by the Park's creators to be of such value that they gave up valuable development opportunities to keep the views uninterrupted.

³ Fifth Report of the Commissioners, 6 May 1826, p. 11.

12. We have established that the view from the Park to the north was of exceptional importance in the early development of the Park. It was the only view in which the green spaces of the hills of Highgate and Hampstead could be seen from within the green landscape of the Park itself, a visual link from the Park to a wider 'rural' panorama which was uninterrupted by urban building.

13. The open views have survived in important sectors of the wider view for over 200 hundred years. Although the Crown Estate built villas on Prince Albert Road after 1840, these are below the tree-line and do not interrupt the longer views protected since 1811. Later buildings impact the uninterrupted views, but sectors survive in which the original view can be still be seen. The applicant's View 10 shows how their proposed towers would interrupt one of the surviving uninterrupted sections of the historic panorama.

14. Given that the fundamental point of the view was to create the impression of uninterrupted countryside – an impression which has, in this instance, survived for over 200 years – the intrusion of two substantial buildings into the view destroys the illusion. The harm has to be judged substantial.

15. We see no exceptional public benefit – beyond the requirements of planning policy – which would outweigh this substantial harm.

16. We also note that given the scale of the Morrison's site there are opportunities for high-density medium-rise development which would provide substantial development without causing harm to local heritage assets.

Richard Simpson FSA
Chair RPCAAC

PRIMROSE HILL CONSERVATION AREA ADVISORY COMMITTEE
12A Manley Street London NW1 8LT

21 December 2016

Martin Scholar
Head of Planning
Barratt London

Dear Martin,

1. I thought it most appropriate to write to you following the presentation on 30 November to the PHCAAC. Thank you for helping to organize it, and for the drinks. This letter has been reviewed and agreed by the Committee.
2. You will be aware that the PHCAAC finds the scheme presented profoundly wrong. I hope it will help to explain why, and that there is still time to achieve a more appropriate outcome for local communities as well as for Barratt and Morrisons.
3. We acknowledge that the present Morrisons and its car-park could be redeveloped with benefits to all. We would also welcome affordable/social housing, and affordable workspace, as well as the new Morrisons on the site. It is what is appropriate in scale and character that is in question.
4. It had seemed to us from the first presentation, in the summer, that the design team had a good understanding of the character of the area and its surroundings, the key importance of the existing heritage assets close to the site, like the Interchange building and the Roundhouse, and the importance of the site for the adjacent conservation areas, of which Primrose Hill is one. In the second presentation, this analysis was not followed through, and a quite alien approach seemed to have taken over. As was said in the meeting, more King's Cross than Camden Town and Chalk Farm. What's special about the area would be destroyed.
5. This is partly a matter of scale. The high buildings proposed would destroy the sense of an area where the historic industrial buildings are dominant. This is critical: it is what makes the area distinctive. If this were understood and followed, many of the critical problems in terms of the views from the Primrose Hill area would be addressed. The present proposals would be seriously harmful to views in the Primrose Hill conservation area which have been protected, including in appeal decisions, over the life of the conservation area. A more appropriate scale would also address significant concerns about impact on the setting of listed buildings, including the Roundhouse on the Chalk Farm Road.
6. But the issue of scale is also of immediate concern on the site. The balance of open space to high buildings, the massing of buildings and their juxtaposition with the public spaces, comes across as alien in character, sterile, and impractical. This is made worse by the sweeps of steps. The 'Market Square' outside the shop is little more than a wedge of space which provides an architectural setting for the new shop, but is bounded by a busy access road to a carpark with a bus route – much needed – and crossed by a service road. This is not going to be a happy space. It is not like Granary Square, which was referenced, but which is very different in spatial terms and in its relation to roads, canal,

and access. The space at Morrisons, as with the other proposed open spaces, including 'Makers' Square', also ignores the reality of life in the area, but deprivation and social stress is real.

7. There seems to be very little understanding of the issue of permeability, of how people move through the site at present, and how they might move through the currently proposed scheme. It is hard to envisage anyone but residents of the development as currently proposed being encouraged to walk through it, particularly after dark. There is, thus, a considerable danger of the new community becoming isolated and detached from its immediate neighbourhood, with potentially significant security concerns. There is a significant danger that the area would only work as imagined in the presentation drawings if it were gated and patrolled: not a success story.

8. We are far from the point at which we can make constructive comments on uses and space, but we are alarmed at the very high number of car-parking spaces proposed. How does this fit with achieving the objectives of the Paris accords? It will worsen, not improve the very real problems of air pollution in our area.

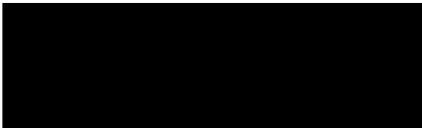
9. We have also been alarmed at the approach to public consultation. We have expressed our doubts about the value of a public consultation which only refers specifically to buildings of seven to nine storeys when 17 storeys are under active consideration. This is not building trust with local communities.

10. We are also puzzled by assertions that no industrial archaeology is in question. While the reports submitted as part of your EIA scoping application are limited in their investigative range and opaque in presentation, we would have expected a full and open investigation of the archaeological issues, rather than what appears to be a veil of obscurity. It would be helpful if Barratt were to offer a full and open investigation in your scoping application to Camden.

11. We welcomed your offer of a further meeting in January: the PHCAAC would welcome further discussion, and remains hopeful that this project can be got back to a more appropriate path.

I look forward to hearing from you.

With good wishes for Christmas and the New Year,



Richard Simpson FSA
Chair PHCAAC

PRIMROSE HILL CONSERVATION AREA ADVISORY COMMITTEE
12A Manley Street London NW1 8LT

15 March 2017

Martin Scholar
Head of Planning
Barratt London

Dear Martin,

1. Thank you to you and your colleagues for your presentation to the Advisory Committee on 1 March 2017. This letter was drawn up following Committee discussion immediately after the presentation, reviewed on 8 March, and agreed on 15 March.
2. In brief, the Committee recognized some very modest changes – to the heights of some buildings, and to the configuration of some blocks. But we saw the main thrust of the work shown to us in March as, in the words of your architect, ‘applying architecture to the buildings’, in order to show us that the masterplan that we saw in November was, contrary to our judgment then, acceptable.
3. While we appreciate the effort undertaken, the Advisory Committee’s conclusion is that the presentation on 1 March confirmed that the masterplan itself needs substantial revision.
4. We nonetheless, attempt in this letter to provide arguments which approach the regeneration of this site positively. We hope to help stimulate a new approach. One which enables Morrisons, with its established local credibility, and Barratt London, and the local community to an agreed scheme. This requires real imagination and open thinking from the professional team. We argue that the current plan is not inevitable, but can be seen as usefully clarifying the problems of this site.
5. The problems we need to address remain those we identified in our letter of 21 December 2016. These are, in summary: the harm to the heritage assets from the proposals, largely the result of height; and, the layout of the site in terms of the sense of place, but also the practical issues of living and working safely and securely in the area. We also now comment, in a preliminary way, on the architectural approach which was shown.
6. To avoid repeating the fundamental concerns set out in our letter of 21 December 2016 – and which still stand – I will follow those points without setting them out again in full.
7. In our para 5 on 21 December we argued that the scale of the proposed high buildings would destroy one of the key characteristics of the area, which is that the historic industrial buildings are dominant. This is partly a matter of the scale of the historic industrial buildings, but also their forms and roof lines. Both the Interchange Building and the Roundhouse have instantly recognizable, iconic forms. They give real character and identity to the immediate area. This is key to the significance of the area and of its relationship to the surrounding areas and to the range of heritage assets they include. This significance would be harmed by the present (March) proposals. In our view the heritage assets should be celebrated as giving unique value to the area.
8. We see it as indicative of the failure to recognize their importance that the adjacent Listed Buildings (in particular the Interchange building and the Roundhouse) were omitted from the block

diagrams of the proposals. The heights of Blocks A, C, and E (11 storey element) are harmful both in long views of heritage assets across the site, but also in views within the site, including views of heritage assets. For example, the views from 'Goods Yard Place' of Blocks A and C where the lie of the land gives the blocks additional dominance, are inappropriate in terms of the heritage assets.

9. We remain very concerned by the approach to the planning of spaces in general (our para 6 on 21 December). The three open areas, Market Square (or Goods Yard Place), Makers' Place (or South Hampton Square), and Camden Hub, remain in our view, alien in appearance and open to abuse.

10. The presentation, did however, allow us some insight into why this is the case. For example, it is a basic characteristic of Camden Town and the Chalk Farm Road that the shops front directly onto the street – shops do not traditionally front onto piazzas as proposed here. It is the strong form of the urban street that is missing in these proposals.

11. We also question some of the claims made for the masterplan in terms of spatial relationships. For example, the location of the long-term supermarket was stated to 'bring activity down to the Chalk Farm Road'. But this is fundamentally undermined by the Market Square/Goods Yard Place itself, which distances the supermarket front from the Chalk Farm Road – which is already set back behind the railway viaduct.

12. We take the view that these spaces themselves lead to the pressure for higher buildings. That is, a development which followed a more appropriate, street-focussed, masterplan, would allow a distribution of building across the site at heights which could better protect the heritage assets, and provide a safer environment for shoppers and residents.

13. We are not convinced that the massing of building is always the most effective. We note that the affordable workshops – a use which we welcome – at the lower level between Blocks B and C and the railway line, with its vaults, are only at one storey, with substantial planting over them. Is this the best distribution of space?

14. We are also concerned at the way the proposed spaces would work for residents. We acknowledge that the developing design of the housing in the low section of Block E suggests more of a working street. We also recognize the importance of areas safe for pedestrians, cyclists, and children. But we are concerned that the present plan does not allow for the practical needs of a range of residents – especially older residents and families with small children. There is a danger that some of the housing (for example in Block D) will become relatively inaccessible and isolated.

15. Turning to design issues. We were particularly concerned by the proposals for the 'petrol station' building on the Chalk Farm Road which we saw as misconceived in scale and form, and very harmful to the heritage assets on which it would impinge. We were grateful, therefore, for the discussion which enables us to demonstrate why this approach is wrong. It was argued that traditional late-nineteenth-century corner buildings offered models for this location. But the high corner buildings shown were characteristic of urban centres – town centres and High Streets – for example Britannia Junction on Camden High Street. But what is critical about the Chalk Farm Road is that it was not a High Street. It is characterised by retail buildings which were built on the front gardens of modest, two- or three-storey houses. It is this modest scale and character which, by contrast, helps give the comparatively massive railway buildings their significance. It is why contemporaries could see the railway buildings built in this area as comparable with the great buildings of antiquity. The March proposal is seriously harmful to the nearby heritage assets, and its justification helps demonstrate why this is so.

16. We would expect a high standard of design in context. We were not persuaded by the design approach: the adoption of isolated features from the historic buildings adjacent to the site in the proposed new buildings. The historic buildings demonstrate a functional tradition remote from the idea of 'applying architecture'. The proposed elevations look aggressively regular, defined by harsh corners and unyielding grids: they miss the animation of the facades seen in the neighbouring industrial buildings. For example, the Interchange building has segmental and round-headed arches and softened corners without losing its general sense of regularity and rectilinearity. While we do not seek pastiche, nor do we see the adoption of design features as solving the problems of the masterplan.

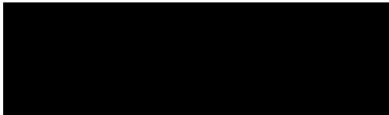
17. We remain concerned by the provision of car parking at 295 spaces: we should all be seeking to reduce car use and associated pollution.

18. We noted the aspiration to provide 35% of the housing on the site as affordable/social rent. We questioned the age mix anticipated in the housing provision.

19. The Committee remains strongly opposed to the proposals as they stand. You suggested that we might discuss the scheme more informally, and I would be happy to do so if that would help achieve an agreed approach. Please let me know if that makes sense.

I look forward to hearing from you,

Best wishes,



Richard Simpson FSA
Chair.