

Camden Council Planning Department
London Borough of Camden
2nd Floor, 5 St Pancras Square
c/o Town Hall, Judd Street
WC1H 9JE



10 August 2017

Dear Sirs

CAMDEN GOODS YARD – planning Application No 2017/3847/P

I refer to the above and, *inter alia*:

- (1) Document titled Camden Goods Yard Planning Framework (“**Framework**”); and
- (2) Document titled Pre application advice (“**Council Advice**”); and
- (3) Application planning Application No 2017/3847/P (“**Application**”)

Considering (1) to (3) in turn:

(1) Framework

At one of the “roadshow” presentations earlier this year I challenged a Camden Council (“Council”) Planning Officer as to the drafting set out on page 24 of the Framework, which uses superlatives - “maximise”, “maximising” - and the exact legal basis upon which the Council therefore expressly made subservient all other factors when compared to this self-stated imperative of the maximising of new homes, including the statement that building heights at or higher than existing what currently exists may be acceptable:

“The existing density of development in the framework area are low, with large unbuilt areas, car parking and building heights which rise to a maximum of 4 storeys. The surrounding context in terms of height is also relatively low rise typically ranging from typically 3-5 storeys with a limited number of examples of 7-11 storeys in the area of the canal and north of the high street. Increases in height could have implications for the setting of listed buildings (including the Roundhouse and the interchange), and on views from neighbouring conservation areas. The topography of the site and its low-medium rise context mean that

any increases in height are likely to be visible and prominent in the local street scene and in long views. These issues and the existing context mean that parts of the area will be sensitive to increased height. The Council wants to **maximise the capacity of the area** and for development to achieve a density that is appropriate to the Town Centre location, **maximising the delivery of new homes and jobs. With this in mind, building heights at the upper end and in some cases higher than the existing context may be acceptable,** subject to development:

- Preserving or enhancing the setting of the Roundhouse, the Interchange building and other heritage assets.
- Preserving or enhancing the setting of surrounding conservation areas.”
- Respecting the surrounding character, context and townscape, particularly at site edges. This should include consideration of site topography and perceived height in relation to the context.
- Creating a positive environment at street level, including an appropriate level of openness, maximising the opportunity for sunlight to reach streets and spaces and including measures to provide a comfortable micro-climate year round.
- Demonstrating exemplary design quality and finish. Set-backs of the taller elements should be considered. This can be an effective way of reducing bulk and mass and minimising the impact of height on the street level environment.”

(2) Council Advice

In the December 2016 Pre-application advice issued by the Council, on page 11 it states;

“Height and massing

We accept that :

- While the site has few positive characteristics of its own, it is large enough to create its own sense of place and character, in a manner which must respond positively to the surrounding heritage and townscape context.
- The surrounding character areas are diverse, but all share a common characteristic of having limited number of discrete elements which project above their prevailing height. In general these are set within landscaped grounds and set back from the street - for instance Eton Hall & Eton Place on Haverstock Hill or Rugmere and Tottenham on Ferdinand St. The massing of buildings along the canal is often substantial, but generally these are of a fairly uniform height.
- This context of height has of course been a factor which has informed a number of recent planning decisions and pre-application discussions in the immediate area.
- Permission granted on second attempt at Hawley Wharf where the tallest residential building reaches 9 storeys (building Xx in Zone B) but are more generally 5-6 storeys.
- The current application by Piercy & Co at 7-12 Haverstock Hill at 7 storeys
- The extant permission at 100 Chalk Farm Road reaches to 8 storeys
- Pre-application discussions at another nearby site on Oval Road is likely to bring forward a 7-storey building

We strongly support :

- The optimisation of this site for development, using the London Plan density matrix as an indicator of the range of densities that would be expected of this well connected Town Centre location.
- However the London Plan is clear that a rigorous appreciation of housing density is crucial to realising the optimum potential of sites, and is only the start of planning housing development, not the end.
- It is also clear that it is important that reaching for higher density housing is not an automatic proxy for more height. SPG sets out that the policy approach to density takes into account the need to secure residential quality (including local context and

character and achieving high quality design), optimising the relationship between transport capacity and land use and the density policy itself which reflects these two key objectives.

We do not consider that :

- a prevalence of general heights in excess of 7 storeys above the Oval Road datum (podium level) are justified on this site, when considering the current proposals within the density policy and townscape context. However, we are of the view that, subject to justification, there are some limited opportunities for elements of up to 9 storeys within the site.

We consider that :

- The current proposals include buildings of very substantial footprint and mass which would bring forward a significant intensification of housing density relative to all adjoining sites. Although we are yet to see the detailed layouts and designs it is evident that they would likely achieve a density level within the appropriate ranges, without the need for significant additional height.

(3) The Application

From reading "Proposed Scheme Part 4 Massing and Scale" it seems that Block A is envisaged as being 14 storeys high, or some 50% higher than even that contemplated under the unprecedented - "*building heights at the upper end and in some cases higher than the existing context may be acceptable*" - guidance from the Council.

As the above is all public domain information, it is very clear that the Applicant has no intention of "doing the right thing" and I trust the Council will ensure that the Applicant follows the guidance already provided.

I live on Edis Street, where I own an upper flat, and note that even the very smallest changes to any building on Edis Street is subject to very conservative and rigorous planning restrictions. I now face the potential prospect of looking out on to nearby high rise blocks some 14 storeys high, of construction, mass and scale very clearly far too large and entirely inappropriate, and totally out of keeping, given the surrounding streets and context.

I have no objection to "in keeping" sensitive development but the Applicant's proposal – following the Framework – is an exercise in maximising scale, mass and height – driven by greed and profit.

Please remove – entirely – my personal details if you are obliged to put this letter of objection into the public domain.

Yours faithfully

