Gavin Sexton,

Planning Solutions Team,

Planning Department,

London Borough of Camden 01 Sept 2017

Dear Gavin,

**Application Ref. 2017/3847/P,**

**Morrison’s Superstore and Petrol Filling Station, Camden Goods Yard, Chalk Farm Road, LONDON NW1 8EH.**

This is the consultation response of the Regent’s Canal Conservation Area Advisory Committee on the Morrison’s proposals.

Our remit is the Conservation Area that surrounds the development on two sides, so we have thought particularly about the quality of the built environment that the proposals will create. After studying the documents including the Design and Access Statement (DAS), the Masterplan cross-sections and the drawings for the Petrol Filling Station, we conclude that the current application needs to be refused, because too much accommodation is being squeezed into this constrained site.

In our detailed comments below, we have sought guidance in the Place Shaping policies in Chapter 7 of the London Plan, which are required to be taken into account in the formulation of such schemes.

**1) Layout of the Development.**

London Plan Policy 7.4 states that ‘Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way…’, but this will not be achieved.

The layout lacks a formal order. This is partly as the result of blocks being jostled so close together. No use has been made of the Roundhouse and the Interchange Building as potential focal points. Note that Roundhouse Way is too constrained by Block A at its northern end to provide a full axial view of the Roundhouse (see DAS p.89), so this opportunity for a vista is lost.

There are no clear ways through the development to provide directional sense for visitors, while the intended pedestrian routes from Oval Road (Gilbey’s Yard) towards the bridge under the railway are tortuous horizontally and also vertically. So the legibility, permeability and accessibility of the neighbourhood are impaired, contrary to Policy 7.1 (D) of the London Plan.

The open spaces around the edges of the site contribute little to the development’s character and are not able to relieve the high density at the core, which we discuss under (2) and (3) below.

It is not clear how the envisaged route along the northern edge, from Camden Lock Market through Railway Park towards Chalk Farm, could be physically extended as part of a “High Line” as aspired. Meanwhile the park is to be available during daylight hours only, so this contributes little strategically.

**2) Building heights and density.**

The proposals of typically 9 storeys, closely packed, are significantly denser than anything in Camden Town so far, and with more units per hectare than King’s Cross Central.

The Applicants’ Statement of Involvement’ on page 24 states that the “massing and distribution of buildings reflect close dialogue with … the relevant CACCs” (sic). This is not only inaccurate but far from the case. We have the strong impression that discussions with community groups started after the building plan had already been formulated, and there was little influence we could bring to bear.

Masterplan Section BB (drawing 1095\_00\_07\_300) shows the dense mass of buildings, mainly of 9-11 storeys, across the middle of the site. These are broad slab blocks, not point blocks, and they are not separated by wide swathes of grass as in mid-20th-century estates. They fill the whole of the centre of the site and crowd in on each other, forming solid walls in silhouette that obstruct the sky, thus they will be much more dominating on the residents and neighbours than taller buildings more widely spaced. See further under (3) below.

Block C is mostly of 10 storeys and significantly wide, also brutish in its styling. Although the visualisation in the DAS, p.251, evokes Piranesian excitement, the sectional drawings show this block to be especially intrusive. Moreover, it denies any chance of views of the Interchange Building from the north, excepting close views from Interchange Yard and the south end of Railway Park. From other directions of view (not illustrated) its great bulk will dwarf the Interchange Building’s tall water tower.

Block D rises to 6 storeys in close proximity to the iconic Interchange Building, and thus will be a storey higher than that building’s parapet level, competing with and dominating it. A significant part of the special historic interest of this former railway warehouse is its distinctive size, so the proposed Block D’s impact will impair appreciation of the building and is not acceptable.

Blocks B, C and E1 crowd in upon Southampton Square, which as the widest space in the development might be expected to provide some relief and yet will receive sunlight from only one direction.

Blocks B and A together present an unwelcoming barrier wall from the north-west, while the display of the giant lettering ‘CAMDEN GOODS YARD on Block B would add insult to injury.

The DAS p.189 proposes a differentiation of the outlying tall blocks A, E1 and C in contrasting materials. There are no visualisations to assess the effect of materials, but adding to the variety of heights and rooftop shapes they could produce a degree of anarchy, while conspicuousness is likely to be increased.

Other effects of the buildings’ bulk and height on view from outside the site are considered below in (6).

**3) Quality of spaces**

 Roundhouse Way scales 13.2m wide near its northern end between the faces of 9-storey buildings, creating a canyon twice as deep as it is wide. Winding Vaults Way is similarly narrow. Maker’s Yard scales only 10.6m wide at its narrower end, between buildings 9 and 11m tall, so is narrower still. These streets are significantly narrower than the limits set in the King’s Cross Central masterplan. The ground will be in shade for a significant part of a day. One must walk more than the length of a street to reach more open space, while Southampton Square, 35m wide with tall blocks on three sides, does not offer much relief.

We feel that living in such streets will be inhumane. Policy 7.4 of the London Plan will be contravened, where it calls for streets ‘of human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings’. Also, we ask whether flats on opposite sides of such narrow streets will not overlook each other unacceptably.

**4) Respect for heritage**

London Plan Policy 7.8 (D) requires that: Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

While the DAS makes many references to the site’s history and heritage, little has come out in practice. As already noted, the Roundhouse and the Interchange Building are not made focal points, while the development will reduce the historical legibility of the area by blocking present views of them and by physical competition in the case of the Interchange Building.

The expression of former railway tracks in surface pavings appears on the face of it a bright idea, except that they have been applied blindly across the whole area, into ‘Camden Yard’ and ‘Goods Yard’ (so-called) where the former Goods Yard level is to be excavated away (and which in consequence are misleadingly named). Moreover, the tracks drawn do not match their actual arrangement.

We would emphasize the need for a full archaeological investigation before any consents are granted. The AOC report that is appended to Part 2 of the Archaeological Desk Based Assessment is startling in its ignorance of the history of the area and of the features whose demolition it was describing.

**5) The Petrol Filling Station site**

The proposed office building has tall storey heights of 4 to 5 metres, with 6.75m for the ground floor, making its six storeys particularly obtrusive. It is significantly taller than the present 100 Chalk Farm Road, further up the hill, and its roof parapet is level with the apex of the Roundhouse. The ‘Winter Garden’ at the south end rises even higher. The DAS eagerly highlights how the ground storey is made to match the height of the demolished Goods Yard boundary wall, yet its actual form will bear no resemblance to that wall, which will not be “read”.

Being on the site of this former ‘Great Wall of Camden’, the building lies within our conservation area. Yet, far from enhancing the Conservation Area as para.137 of the NPPF recommends, its great size and the indifferent architecture are highly damaging. The new building at this location, which is needed to mark the entrance to the Camden Goods Yard and make better use of the present land, should be of high quality and pay particular respect to the existing scale of Chalk Farm Road, It should defer to the importance of the Roundhouse. Instead, we have an ugly building with an excrescence tacked on that has the shape of a giant advertising hoarding.

A subsidiary concern is that large pedestrian flows from this and future redevelopments, coupled with traffic congestion, will produce a physically unpleasant environment at the constricted road junction.

**6) Views from outside the site**

Few will have the time to read more than a fraction of the documents in the application. They will, however, look at whatever views they consider relevant. This places a duty on the applicant and the planning authority not only to get such views right but to select the right views.

Many of the views are highly selective, with dramatic changes evident simply by moving a small distance from the selected viewpoint. Other views exaggerate the developments proposed by others to show how such development screens the proposed buildings. We would urge firstly that the Council require independently produced views, and secondly that the applicant provide written confirmation that the views showing other parties’ developments have been approved by them as representative.

This part of Camden Town and beyond can be seen from Primrose Hill, from where, currently, a blend of low buildings and trees forms a soft edge to the wider view of London that so many people go to enjoy in their leisure time, and the distinctive tower of the Interchance Building provides a useful and instructive landmark. View 2 shows how drastically this would be changed, the new block of buildings being so massive and filled with competing shapes, textures and colours. The white rectangle of Block E1 is particularly obtrusive, also hiding the interchange Building, while from a slightly different viewpoint the hulking mass of Block A would stand out prominently.

We shall comment on closer views that impact the Conservation Area directly.

View 13: Shows the ugly intrusions on the skyline from Regent’s Park Road, a skyline that was previously dominated by the Grade II listed school. The new buildings will be even more intrusive in winter.

View 14: While the selected viewpoint shows mostly trees, the visual impact increases to the north along the towpath.

View 16: Another view selected for minimum impact. The skyline of the development from Fitzroy Bridge appears lower than that of No. 42 Gloucester Avenue, although the impact is still damaging. Moving the viewpoint to the top of the bridge, or to the opposite side of the bridge shows the development has a much greater adverse impact.

View 21: This view gives a misleading impression of the impact of new consented buildings that are to be built by the Roundhouse by selecting the position that maximises such impact.

View 22: The impact of the redevelopment of No. 100 Chalk Farm Road is exaggerated by not showing the set-back from Chalk Farm Road that is intended to create more public space to improve views of the Roundhouse and mark the old alignment of the Great Wall. At the same time this exaggeration masks the impact of the PFS when viewed from this north-westerly direction.

Views 28-31: These views from Chalk Farm Road show how the Horse Hospital (Grade II\*) is dominated by the absurd quasi-transparent screen attached to the PFS. Despite the obvious selectivity of the views, the visual intrusion of the development remains evident.

There is no view given from the top of the ramp(s) leading to the upper floor of the Horse Hospital. Yet this area provides visitors with the best view of Stables Yard. The development will have a severe adverse impact on views to the south from here.

View 37: This view is incorrectly designated, being Oval Road north. The camera should have been positioned on Southampton Bridge, where the importance of the views up and down the canal will be severely intruded upon by the new developments to the north.

**7) Analysis and Conclusion**

We have had difficulty in discerning how the proposed development density has been derived, but it would seem to be based on the London Plan Density Matrix for housing, the high public transport accessibility and Camden Town’s designation as a ‘Major Town Centre’. A considerable employment base is projected on top of the housing. Those are theoretical considerations, and in determining housing density the London Plan Policy 3.4 (A) says that local context and character and the design principles in Chapter 7 of the London Plan should also be taken into account,

This is a difficult site to develop to a high density, being limited in plan area and with constrained external access. There are adjoining sites whose present and future needs must be allowed for and where conflicts between an intensive daytime and evening economy and quiet residential use require difficult resolution. There are neighbouring listed buildings that require respect. The site is raised on a plateau, two storeys above surrounding streets, making it stand higher and more intrusive in the surrounding townscape than the nominal numbers of storeys might imply – effectively, two domestic storeys should be added to quoted figures rather than regarding the underground parts as basements. Given those constraints, expectations of what can be fitted onto the site need to be tempered.

Our examinations of the physical effects of the proposals tell us that too much accommodation is being put on the site. Consideration of the constraints on the site indicates that initial aspirations need to be modified. Our conclusion is that the application needs to be withdrawn or refused.

Sincerely….

 Anthony Richardson

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