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MARKETTECH

Gavin Sexton,
Planning Solutions Team
London Borough of Camden
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By email: gavin.sexton@camden.gov.uk and by post

18 October 2017

Dear Mr Sexton

**Morrisons Superstore and Petrol Filling Station Camden Goods Yard Chalk Farm Road London
NW1 8EH
Planning Application Reference 2017/3847/P
Representation made by Market Tech Holdings Limited (MTH)**

We thank you for the opportunity to comment on the Camden Goods Yard planning application which was submitted to Camden Council in July 2017, and set out our views below.

Background

MTH is the largest private landowner within Camden Town and owns significant sites within the Camden Goods Yard Planning Framework area including the Interchange Building, Stables and Camden Lock Markets (the latter sitting adjacent to the framework area). MTH fully supports the principles behind the adopted Camden Goods Yard Planning Framework (July 2017) which is a carefully considered and well written document prepared by the London Borough of Camden. We commend Camden on their preparation and consultation of this SPD.

MTH is part of the Camden Goods Yard Working Group (CGYWG). MTH supports the comments submitted by the CGYWG in respect of this application to Camden Council on 1 September 2017.

There is no question that this site is a once in a generation opportunity to create a new mixed use neighbourhood in Camden Town. However these proposals have, in our opinion, been rushed through without considering its long term impacts and fully engaging with the local community and stakeholders

MTH considers that the planning application scheme requires a number of fundamental changes to be made before being considered by the Planning Committee. MTH also has a number of detailed comments but these can be presented at a later date once the fundamental issues have been resolved.

Consultation

MTH, as a major landowner in the area, finds it extremely disappointing that the applicant has not sought to work with them to resolve connectivity and futureproofing issues between

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the landholdings, particularly as Stables Market is a vibrant town centre site with connections to the rest of Camden Town Centre through the other markets, Camden High Street and the Regent's Canal. MTH is of the view that there should be direct pedestrian connections between both sites and that there are a number of missed opportunities which could have benefited Camden residents, employees and visitors as a whole.

Routes and Spaces

The submitted scheme is missing the opportunity to address the existing spatial constraints and improve the limited accessibility of this island site and its surroundings. Site access remains limited to the narrow main entrance from Chalk Farm Road. The significant level changes within the site have not been addressed as part of this major development opportunity. Space Syntax has reviewed the application for us and fed into this response.

The spatial organisation of the masterplan does not consider opportunities for better connectivity in relation to future development of the two neighbouring One Housing sites and Network Rail sites to the west, neither does it create better access to Chalk Farm Road and the Round House, Camden Markets and the Interchange Building, and the wider Town Centre and Regent's Canal areas. There is a lost opportunity to extend the pedestrian route along the viaduct adjacent to Block C, which, had there been a level change, would have created direct routes around the site and into the adjoining sites.

The adopted Camden Goods Yard Planning Framework sets out the expectation for development in the area to contribute to the improvement of accessibility, improving conditions for walking and cycling. New and improved walking routes should connect with existing streets and create routes that better interconnect existing and new local destinations and walking routes with each other.

None of the suggested pedestrian links in the Planning Framework are included in the application. By retaining the island condition of the site, the application scheme does not contribute to the implementation of the contextual vision of the adopted SPD and effectively blocks a number of framework objectives by preventing the recommended connections to the wider context. This limits wider access to any new amenities created on this site and makes it harder for its new residential population to access important surrounding destinations on foot and by bicycle.

This application will create a secluded, high-density area which will lack sufficient urban background movement to sufficiently activate its public realm and sustain local retail throughout the day and week. It will create unnecessarily long local journeys for its new residents and working population. It will prevent the long-term alignment of the future development aspirations as set out in the adopted SPD for the wider area.

In summary, the masterplan has not considered the movement of people and therefore fails to deal with the isolated island feel of the site. The masterplan should have first dealt with the routes, spaces and connections across the site and to the surrounding area and then placed the buildings adjacent to these routes and spaces.

The Transport Assessment does not consider the potential uplift in residents of Juniper Crescent and Gilbey's Yard. Again, as this is a once in a generation planning application, theoretical numbers should have been applied to test whether the proposal in terms of the capacity of the proposed routes and spaces is acceptable for the vast number of residents and employees who would be using the site in the future. The assessment therefore fails to futureproof the site as per the CGYPP SPD.

Land Uses

The site is located within a town centre location and should therefore be retail/employment focused alongside residential uses. However, the scheme is fundamentally residential-led and is contrary to the CGYPF in which the Council expects that 'there should be a clear transition in the nature of the commercial/mixed use environment from the core of the town centre into more residential areas'.

Furthermore, there are a number of proposed residential uses adjacent to Stables Market which provides a vibrant night time economy, not just for Camden Council but London as a whole. The night time economy must be protected and any new resident must understand the location that they could be moving into.

MTH considers that the application scheme fails to integrate with the surrounding area in terms of existing and proposed uses.

Historic Matters

MT owns the Horse Hospital (Grade II* listed) and the Interchange Building (Grade II listed). At present, the Roundhouse (Grade II* listed) is visible from the Horse Hospital.

The 6 storey proposal on the existing Petrol Filling Station site is wholly unsatisfactory and overbearing on these designated heritage assets. The proposal does not meet the CGYPF for preserving or enhancing the setting of these historic assets, nor does it complement the setting of these historic buildings. MTH is of the opinion that the PFS site requires a statement building to attract people into the site but it should not be at the detriment of the historic assets.

The applicant has not provided any views to demonstrate the impact from Buildings C1 and C2 on the Interchange Building and we consider that this information should be provided in order for the application to be properly considered, particularly as Building C2 has been designed to be almost twice the height of the Interchange Building.

MTH would welcome the opportunity to provide further comment on this element of the scheme once this information is available.

The proposed public realm space adjacent to the Interchange Building fails to integrate the listed building into the scheme. We consider that the applicant should have worked with us to resolve important level issues across the site and knit the application site into Camden Lock Place and the surrounding area.

Public Realm and Anti-Social Behaviour

MTH considers the height to width ratio of the proposed public/private spaces/streets is unsuitable. In its current format, the proposals create a canyon effect at ground level, thereby failing to meet the Council's requirement to provide the highest quality urban design.

MTH has worked closely with the Metropolitan Police to reduce drug crime and anti-social behaviour across Hawley Wharf and the other market sites in Camden Town. The soft public realm landscaping proposals with low level shrubs and planting is unlikely to discourage the use of drug dealing in the area.

Residential Design

The distance between the residential buildings appears to measure just 12 metres habitable window to window in some locations, and in other locations 14 metres. Camden Planning Guidance 6 (Amenity) states that there should normally be a minimum distance of 18 metres between the windows of habitable rooms of different units that directly face each other MTH therefore questions the quality of design of the proposed residential blocks.

Summary

In summary, MTH is of the view that the application proposals are a missed opportunity to transform this significant site in Camden Town to the benefit of Camden Town as a whole. We consider that the current application needs to be withdrawn to deal with the fundamental masterplanning and design issues before officers and the Planning Committee can determine the application.

MTH would be happy to attend a three-way meeting with the applicant and Camden Council to discuss these issues further. Please feel free to contact me at roberl@market-tech.com or on [REDACTED]

Yours sincerely

[REDACTED]

Robert Akkerman
For and on behalf of Market Tech Holdings Limited