

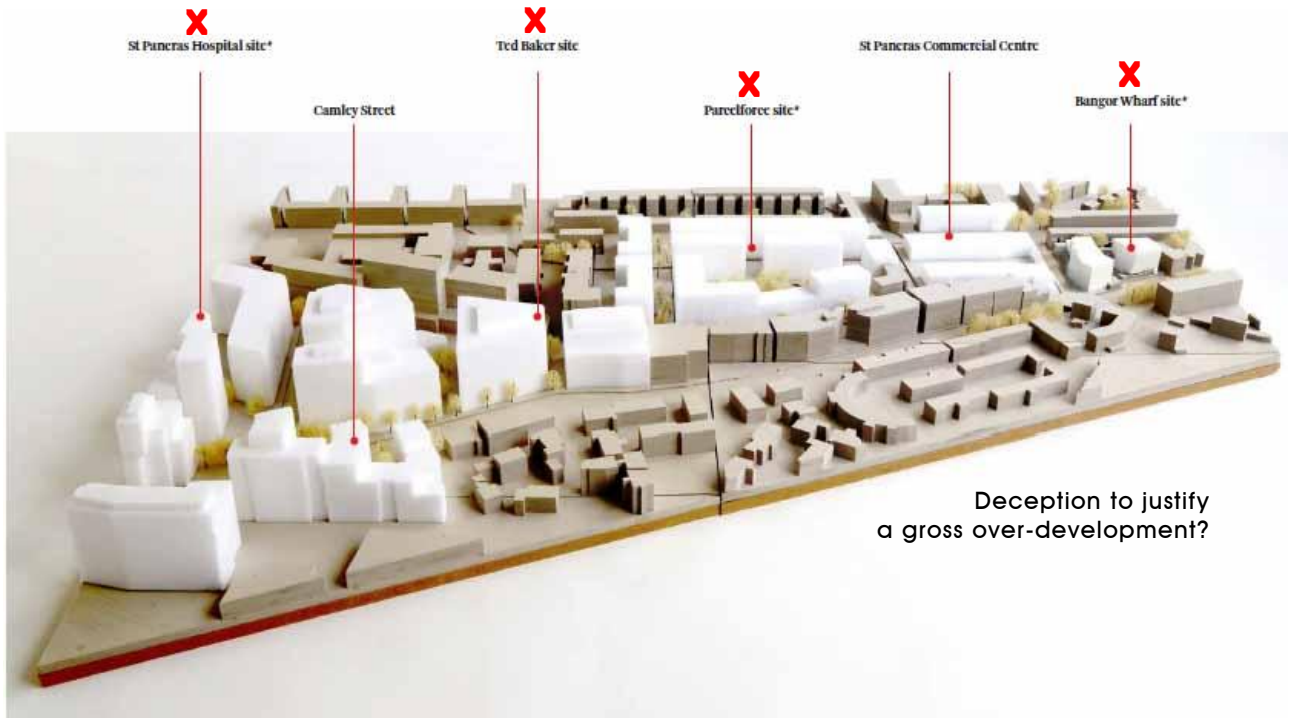
THE REGENTS NETWORK

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63 Pratt Street NW1

St Pancras Commercial Centre Development NW1

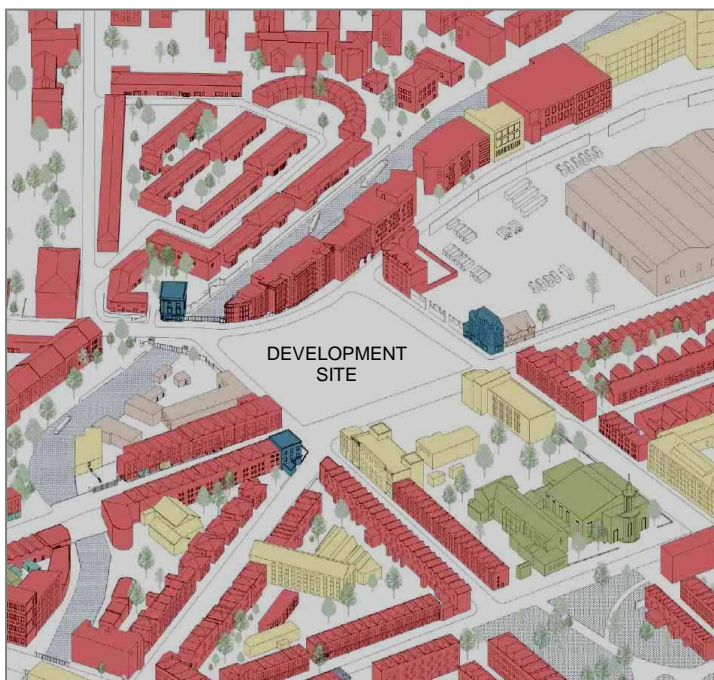
Planning Application Ref: 2019/4201/P - **OBJECT**



Deception to justify
a gross over-development?

The presentation (above) of the application in the D&A Statement is a direct fabrication that is biased and misleading. The so-called 'potential' large developments are very uncertain – the Parcelforce site is uncertain, the Ted Baker site is on permanent hold (and subject to a challenge) and the St Pancras Hospital site is very doubtful. The applicants have even included Bangor Wharf which has been rejected!

It is dishonest to portray these doubtful developments as a precedence, and to justify the greed element.



It is interesting to see another illustration in the D&A Statement that shows the grain of Camden Town being low level brick terrace houses predominantly.

The area nearer to Kings Cross (top right corner) may have been over-developed with larger buildings, but only because Camden has improperly allowed the illegitimate Opportunity Area Creep (which has also had such a negative effect on the heritage and open space of the Regent's Canal).

But the closer you get to Camden High Street (bottom of pic), the more dominant is the historic character of Camden Town, with more heritage and listed buildings. The remnants of the notable charm of many of the Camden Town distinctive buildings and streets survive contentedly.

The right sort and scale of property development and change that does not blight the area would not be opposed in Camden Town, but the exploitation and the greed of this application is strongly contested.

BEFORE

Current view of Pratt Street



AFTER

Intrusion of the unwelcome eyesore



The current low level brick warehouse does not cause any distraction, but it may turn into a monster that does not fit into the character of Camden Town. Such a gross development running down Royal College Street (not a wide avenue) would enclose the street and throw its many residents and visitors into shadow.



If this over-development is allowed, there would be a significant loss of sky and views over the Regent's Canal and its important conservation area. The scale of the development would have a serious negative effect on the open space of the Regent's Canal, and would overpower the charm and calm of the waterway. Showing the proposed development in the distance (above) does not disguise its huge bulk and dominance. As you walk along the towpath towards the heritage Grays Inn Bridge the huge block towers over the canal.



We should never allow any property development that will be such a shock to the Camden neighbourhood.

The 'before' view shows the low level character of Camden Town's buildings and housing, and the all-important outlook of distance and sky.

The 'after' image is of the lowest section of the proposed development after the dreaded deed is done that will blight the area for decades.

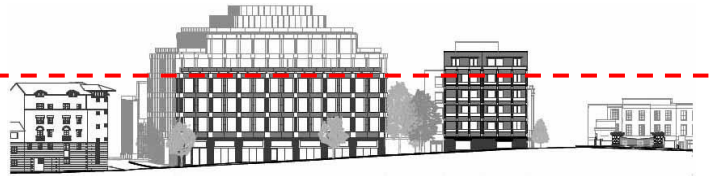
Many of the architectural details and internal layouts may be of a high standard, but it is the whole concept of the development that is defective and out of scale. It is certainly the wrong building in the wrong place.

Doubtful documentation

Setting aside the architectural plans, some of the supporting documents are abysmal and totally unreliable.

The applicant says that “in terms of height and massing, the development would sit comfortably with the existing building scales on the streets it addresses” (Visual Impact and Heritage Assessment, Para 6.42), when it is plain to see that the huge edifice is totally out of scale and dominates the surrounding (listed) buildings, and particularly towers over the familiar (listed) brick terrace in Royal College Street, for instance, well under the red line.

It goes on to say that the gross development “represents a modest step up in scale compared with its immediate neighbours”! This defies the truth, and lacks any pretension of modesty.



The doubtful justification for the development is further compromised by claiming that the building is considered appropriate “by virtue of its situation on two main roads and its location beside the canal bridge” (Ibid, Para 6.42), which makes little sense let alone any bearing on reality.

The applicant also says that the Site’s existing buildings “are ill-mannered and unfitting for this prominent urban site beside the Regent’s Canal” (Ibid, Para 6.41, underlining added), without recognising that emphasising that the site is ‘prominent’ denounces their own proposed development as unfitting to a greater degree! Muddled and incompetent to say the least.

It is of great concern that the applicant and team probably know more than most of us about planning, and have paid staff to provide the script (to order, no doubt). They will know better than us that what they are saying cannot be justified. Unfortunately this is typical of what we so often see from developers – they know full well how far it would be reasonable to go, within planning constraints and recommendations, then they add at least another 40% – or more.

Ambition or greed?

There is nothing wrong with ambition that may take you to the limits of policy and planning documents, and for which there is no need for justification. However, going further than reasonable or beyond common practice, and requiring spurious arguments (as above) to justify this, could be considered as greed, or at least selfishness with unbalanced advantages. It is the local community and London in the long term that are harmed and exploited, and in this case with a gross over-sized development, the further disfigurement of Camden Town. There would be one winner and many losers.

Policy or precedence

Planning policy does not need justifying, and it is the statutory requirement. On the other hand, many developers, as in this application, swap policy for ‘precedence’.

It seems common practice for a developer to find an over-sized or extreme existing building somewhere in the vicinity and use it as their measure – and adding at least 25% of course. But precedence does not exist anywhere in planning law, and every development must be judged on its merits and in its context.

This Camden Town development is a tragic example the worst sort of precedence where the applicant even uses un-built or rejected developments as their measure (D&A Statement, Page 13).

In any event, precedence works both ways – if you find an extreme example of development it can either be considered that you can have more of the same, or on the other hand that one over-development is quite enough and we don’t want any more.

National planning policy on heritage

Returning to relative sanity and common sense in planning, it is wise to start at the top with national policies and the 2019 NPPF Chapter 16, ‘Conserving and enhancing the historic environment’, especially in relation to heritage which is at the core of this wayward application.

Conservation areas such as the many that surround the development site are characterised by their “special architectural or historic interest” (NPPF, Para 186), and it is relevant that “when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the

asset's conservation" (Ibid, Para 193). The applicant of this development mentions the heritage assets, but in passing, and fails to give them any relevant consideration at all, let alone great weight.

Non-designated heritage assets are just as important to consider, including a most prominent one beside the application site, the Regent's Canal, which predates most of the heritage in the area by decades (or centuries). The national policy makes it clear that "the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application" (Ibid, Para 197). And again the applicant does not give this sufficient (or any direct) recognition – and respect – although the canal gets a very brief mention.

It is significant, and apparently ignored by the applicant, that the NPPF also states that new developments should make "a positive contribution to local character and distinctiveness" (Ibid, Para 185c). The proposed development, as well as the major problem that it is totally out of scale with Camden Town's historic surroundings, the design is a bit brutal and hard, and does not fit in even though patches of brick are used on the extensive elevations. It even seems like the buildings are parachuted in from another location, and designed for another purpose (and for profits of course) without the character and heritage of Camden Town being the starting point. This is not welcome here.

Local and London policies

So much for the national policies, but the core of the planning is in the Camden Local Plans where there is no shortage of sound policies and requirements that relate very closely with the issues (and problems) raised by this application, including heritage and the historic environment. Local authorities are responsible for heritage assets and conservation areas (under the Planning Act 1990), as well as decision-making in planning issues. It will be interesting to see the response from Camden to this unwelcome application.

The Mayor's London Plan is especially strong on heritage – as it features so much about the character and importance of our capital city and its world-renowned historic and heritage character. The daft London Plan, which is in preparation deals comprehensively with heritage, and Regents Network has been involved with the drafting of the new London Plan including the heritage issues. Unfortunately the response from the Mayor's Planning Team to local planning issues has been disappointing, and the responses have often been unreliable and biased. Londoners need a stronger lead or support from the Mayor and his planning team.

Dominance of heritage

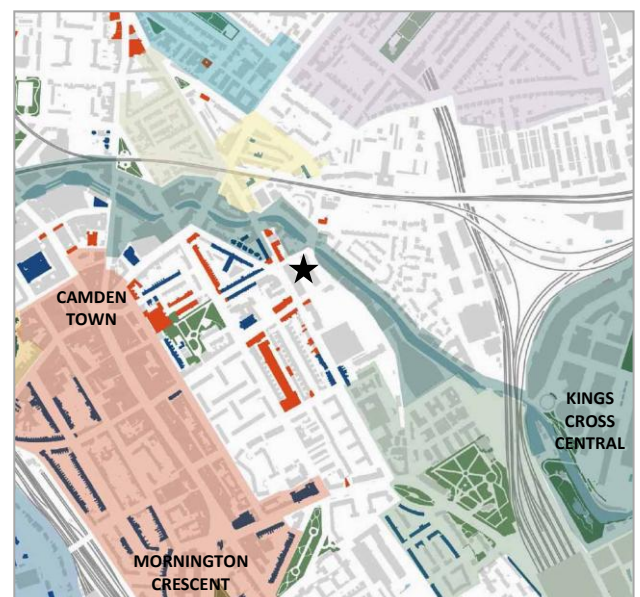
Undoubtedly there should not be any question about the unsuitability of the Pratt Street application and the oversized building being forced into Camden Town. A study of the applicant's 'heritage map' (right) leaves no doubts about the importance of any new development being sensitive to the local heritage treasures.

The application site is in the centre of so many listed and locally listed buildings and heritage assets, as well as the numerous non-designated heritage assets (including the Regent's Canal) and the historic terraces and streets, and surrounded with conservation areas, that it is surprising that the location is not a conservation area itself.

But the quality and profusion of the history and heritage more than makes up for the CA omission.

Suggested outcome

For this application to be acceptable the huge scale of the buildings should be reduced by a significant amount, but not only by a few percent to give the appearance of responding to the over-development, but which is still far larger and higher than is permissible and suitable! The visual appearance needs to be softened to fit in with surroundings, rather than the stark geometric style that does not seem to have any reason. It would be nice to be able to welcome the development to Camden.



The development site in the centre (★) closely surrounded by six conservation areas (in different colours), and with over 28 listed buildings and terraces in red and blue nearby.

DEL BRENNER

Regents Network and

Regents Canal Conservation Area Advisory Committee

October 2019

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