

***Much damage is proposed for Camden Town!***

Response to planning application 2019/4201/P

In mitigation to 'concerns relating to the height of the proposals', the developers state that 'The top two storeys of the tallest building have been deliberately stepped back to mitigate any impact at street level.' This is inadequate. The views of the building, from Conservation Area and Listed building, and open spaces of roads and bridges, show the top storeys. This is not yet Oxford Street.

Statements by Peter Stewart Consultancy underestimate the importance of St Pancras Way.

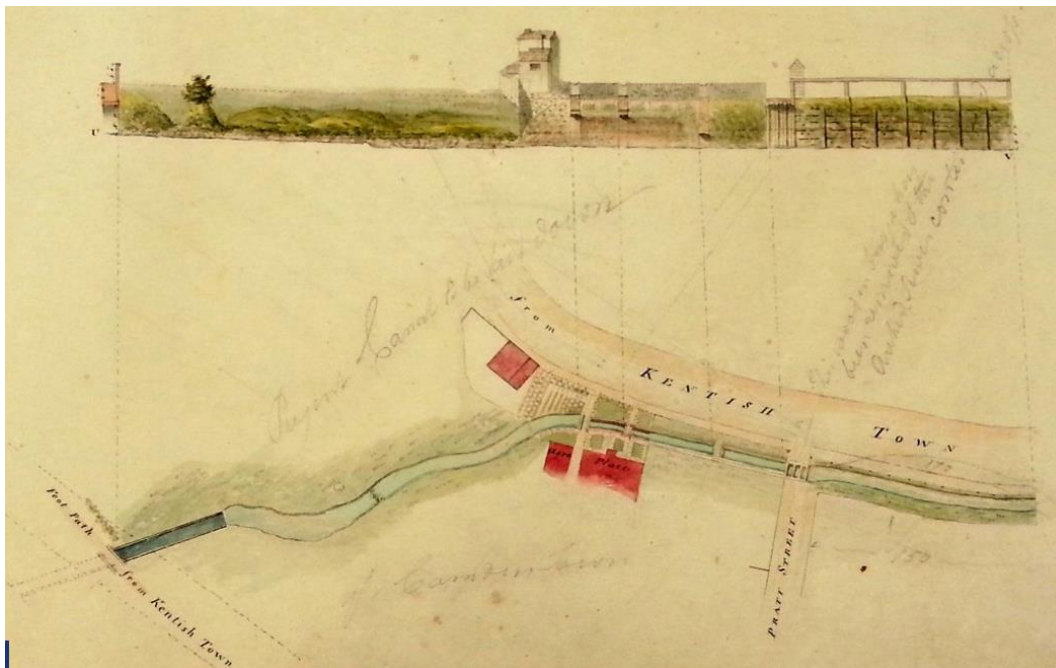
*'3.8 The meandering St Pancras Way was created in 1834, contrasting with the regular layout of nearby streets, including Royal College Street and Camden Street.'*

*3.13 On crossing this canal bridge, there is pronounced drop in site levels as the road kinks to follow the alignment of the canal.*

St Pancras Way stood between Cantlowes Manor house and St Pancras Manor house at least as far back as the Parliamentary Survey of 1649: it 'winds' at this point to rise up the sharp escarpment. Oliver Goldsmith travelled this road to Kentish Town. The canal was built in 1820 to align with the (then) King's Road, not vice versa: the gradient turn is better appreciated by walking up the road at this point, rather than driving down.

Bizarrely, this report does not notice that the site is in the Fleet Valley and covers the Fleet River.

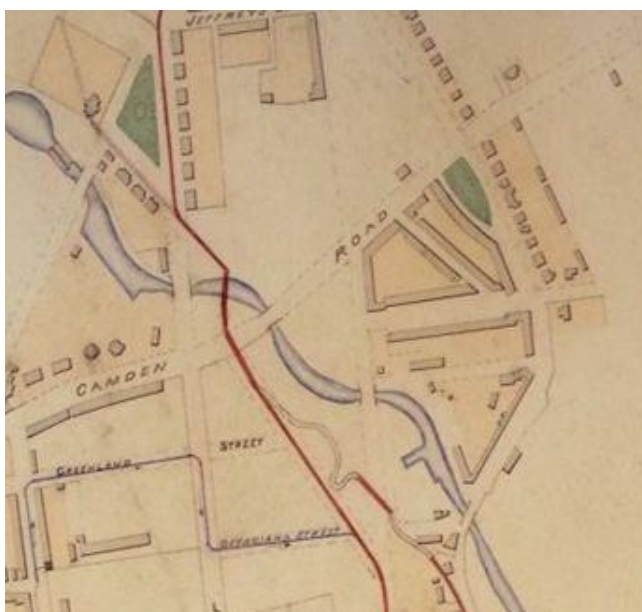
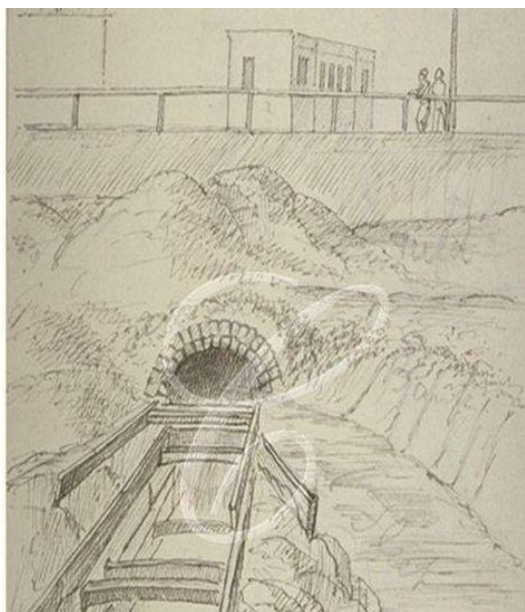
It was recorded in the 1817 Holborn and Hampstead Commissioners of Sewers' map of the Fleet:



And in the Camden Town estate map, 1837



Crosby made a drawing titled 'View of shorings for a new sewer, from the arch through which the Fleet River runs under the Regent' Canals at Camden Town to the sewer in College Street'.



Crosby A. LMA, Collage Collection

Holborn & Finsbury Commissioner, 1839, LMA.

The Crosby drawing matches a map of the Fleet drawn for the Holborn and Finsbury Commissioners of Sewers in 1839 (London Metropolitan Museum): just below Camden Road, the sewer divides from the Fleet. The sewer passes along the newly-built (and for that purpose) Lime Street to join Royal College Street, while the Fleet retains a slightly more eastern path, crossing (under) Royal College Street to run next to Kings Road (St Pancras Way). The central part of this route is probably seen in this further picture.

This has critical implications for

1. Archaeology. The Fleet valley would have been a pathway (the King's Road on the east bank above its flooding).

The archaeological also assessment fails to report that *Palaeolithic fossils* (including mammoth and hippopotamus) were found in the 1840s at Brecknock Crescent/Camden Road, which are now in Natural History Museum, showing the importance of the valley outside the existing designated Archaeological Areas. The finding of a *mediaeval hearth* at the point of St Pancras Way is mentioned in a table, but since this is the point where the Cantlowes Manor used to stand, it is possible that this goes back to the description of Cantlowes in Domesday.

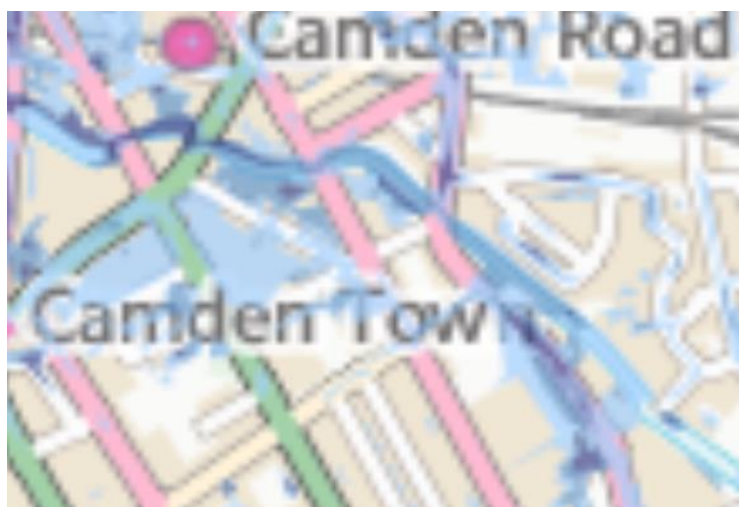
2. Flood control. The Fleet is the line of the surface-water flooding (though poorly shown in the Environment Agency computer-simulation)

The Surface Water Management Plan, (Halcrow 2016) for LB Camden (which is not mentioned) states:

"Surface water modelling indicates a widespread vulnerability to surface water flooding across the Borough and most of central London. This is in part due to the flat gradient and 'noisy' digital terrain data. In consultation with the London Borough of Camden, seven LFRZs have been identified, corroborated by modelling data (to a degree), local knowledge and records of historical incidents."

One of the LFRZs in at Camden Town

The Environment Agency maps (modelled, not recorded) do not give adequate attention:



3. Basement excavation. The BIA mentions the Fleet as a sewer, but ignores the drainage that would exist from local groundwater (there are records of springs higher along St Pancras Way).

It is of considerable concern that Thames Water's submission of 22 October, a day before the end of public consultation, lays down a series of requirements forbidding piling or excavation near to the water courses.

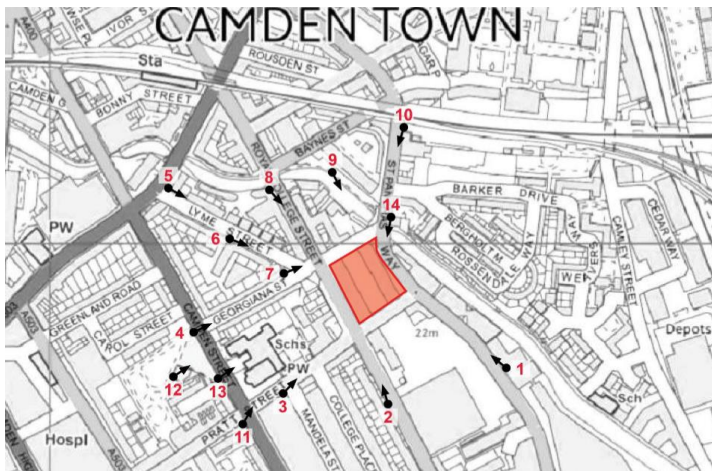
Has the proposer's BIA adequately considered the Fleet? Since the proposer pays for the submitted BIA, where is LB Camden's quality review?

### Conservation objections

This site is of crucial heritage importance. Apart from its own historical use (fields, house gardens, the refuse-using electricity generator, retail premises) it is adjacent to and visible from a significant array of listed and locally listed buildings and conservation areas.



More attention should be given to the wharves of Regent's Canal: the Bangor wharf (for Welsh slates) and the Camden wharf (actually in St Pancras land). The significance is the low level of these structures, providing light as well as views.



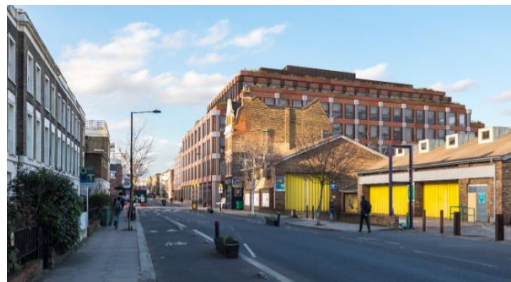
| PSC View no. | Location  | Render/Wireline |
|--------------|---|-----------------|
| 1            | St Pancras Way, outside no 20                           | R               |
| 2            | Royal College Street, opposite entrance to postal depot | R               |
| 3            | Pratt Street / Mandela Street                           | W               |
| 4            | Camden Street / Georgiana Street                        | W               |
| 5            | Camden Road / Lyme Street                               | W               |
| 6            | Lyme Street, outside Lymehouse Studios                  | R               |
| 7            | Georgiana Street / Lyme Street                          | R               |
| 8            | Royal College Street / Regent's Canal                   | R               |
| 9            | Regent's Canal towpath, opposite Eagle Wharf            | R               |
| 10           | St Pancras Way, near railway                            | R               |
| 11           | Camden Street / Pratt Street                            | W               |
| 12           | St. Martin's Gardens, central path                      | W               |
| 13           | Corner of St Martin's Close and Camden Street           | W               |
| 14           | Canal bridge on St Pancras Way                          | R               |

Notes: The approximate Site boundary is indicated by the red line.

5.1 The set of viewpoints identified Figure 2 has been agreed in consultation with the London Borough of Camden. The set is considered to provide a representative range of viewpoints from different directions, including any views of particular sensitivity

A number of statements are hard to justify.

"The Development would be seen to introduce much needed definition and animation to this end of St Pancras Way ... welcome containment to the street at the point where it climbs and gently curves towards the canal bridge."



From Lyme Street, "One will be able to make out the stepped massing of the office building, the appearance of its upper levels softened by planted terrace."

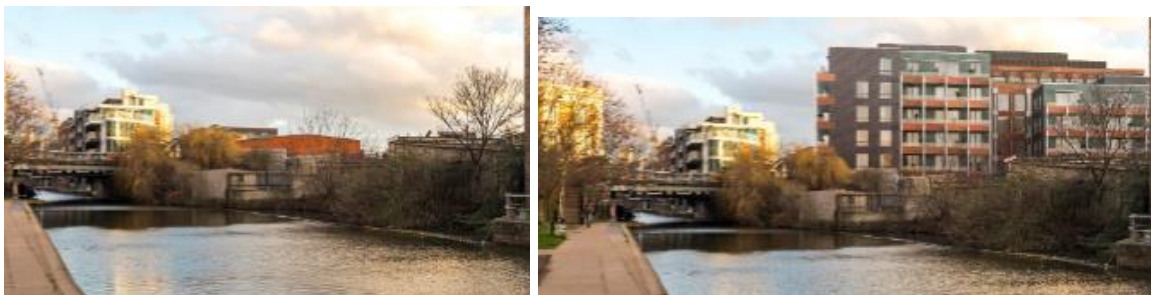
Trees hanging in the distant air?



This simulation implies that the 3-storey pub on left is the same height as the 8-storey new block on the right.



The overbearing style is well shown here – blocks that would be too high for Fitzrovia, which was originally built in the same period.





The accompanying verbiage: "would form a positive new focus in this view. Its scale is well judged, reflecting its prominent location beside the canal bridge and reinforcing the sense of arrival at this northern threshold to the St Pancras area. ...There is a robust quality to the expression of these buildings."

### Sunlight

The measurements show substantial reductions in light as a result of this over-sized block. By not reducing to low minima, these are 'accepted' in the assessment. Yet they are a considerable impact on pedestrians and road users in St Pancras Way, whose journey experience (it is a cycle path as well as vehicle) would be critically diminished.

**Overall**, objections to the intentions of the proposal

| <b>Proposal</b>  | <b>Response</b>  |
|--|--|
| 32 new homes ranging from 1-4 bedrooms, 44% affordable based on unit number;       | While LB Camden wishes to increase housing within the borough, this should not be achieved at the expense of the cultural environment. 8 social housing out of 32 new units is low achievement.  |
| Retain the existing light industrial and storage / distribution floorspace on site | The proposed industrial space requires a dangerous basement and provide nothing like the existing open-air and naturally-lit space. It will be dark and ugly – as Grimshaw's nearby Sainsbury's building.  |
| Provide modern Grade A and flexible office floorspace;                             | The demand for office space at Camden Town is not demonstrated – especially as the Council has approved conversion of offices to housing in three large blocks in Camden Road nearby within the last decade (Transport Police, Twyman, 79 Camden Road) |

|   |  |
|---|--|
| Create up to 1,200 new jobs and bring welcomed employment to this area of Camden                    | It is not evident that 'this area of Camden' needs '1200 new jobs' – nor is it specifically agreed LB Camden policy.   |
| Increase spending and investment in the local economy by approximately £1.8m annually               | Well, this could be good for Camden Road Neighbourhood Shopping area, and local professional services, but the plan does not present any planned nor economic 'multiplier' evidence.   |
| Generate approximately £2.0m in business rates for Camden   | This should not be a criterion for the development.  |
| Improve access and servicing arrangements for light industrial and storage / distribution tenants   | 'Improvement' is not shown – the proposed arrangements are worse.  |
| Provide a new public open space in St Pancras for the community to enjoy                            | A new space at the expense of a green grass area, with little light, and the existing public open space of the existing work premises is lost.   |
| Improve the surrounding public realm  | How is the public realm improved with such worsened views?   |
| Deliver significant construction employment and associated spending                                 | No economic evidence is presented that previous large block developments nearby on Camden Road created <i>any</i> local employment or 'associated spending' during construction.   |
| Regenerate and transform the existing area  | Camden Town was built as an early Georgian suburb of London, built on a grid, adjacent to the turnpike St Pancras Way (once Back Road or Grays Inn Road). What is the nature of the 'transformation' proposed? Where is it presented in the LDP? |
| Provide new active public uses at ground floor level to reactivate street frontages                 | The current frontages are indeed inward-looking, but the proposed glass-plate frontages are not necessarily more inviting and nor are they demonstrated as 'reactivating'.   |
| Deliver a high quality and attractive urban design, embracing principles of sustainability          | The lifetime embodied energy of a new concrete block, compared with retrofit of the existing brick building, shows this is a false claim in absolute terms.  |
| Create a safe and secure environment for existing and future residents, employees and visitors; and | This is unexceptional  |
| Generate a range of planning benefits to be agreed through planning obligations                     | Is this an open statement 'Allow us to build higher and you can get more planning benefits'?   |

Rochester and Jeffreys conservation areas ('South Kentish Town CAAC')

October 2019.