

Response to

Camden Local Plan Submission Draft, 2016

We responded to consultations on the Draft Local Plan in 2013 and 2015. The specific concern of this response is for greater recognition for the locality of North Camden Town.

This document is accompanied by the Draft Revised Rochester Conservation Area Statement (ten parts)

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1. Introduction and 'Growth'

Re 1.1 It would be welcome for Local Plan 2016-2031 Submission Draft (henceforth 'Local Plan') to describe in summary (even if in an appendix but in enough detail to allow measureable assessment) how the Plan differs from the current Core Strategy and Development Policies planning documents (adopted in 2010); and why – eg whether specific existing policies have failed, or new circumstances require new policies. At present we cannot assess the reason for a new Plan.

Re 1.2 Please explain better the relation of the Local Plan to the Camden Plan. In the Figure titled 'Planning document hierarchy', the Camden Plan is set to one side above the National Planning Policy Framework and the London Plan (it would be welcome for the electronic version to provide a hyperlink so that a reader can readily access the 'superior' document). The text says the Local Plan will 'assist the delivery of other plans and strategies prepared by the Council and other service bodies': examples of these should be given, as they are not in the Figure.

Re 1.3 Is the Camden Plan also a document in 'Camden's development plan', or are all the documents in the middle row subservient?

Re 1.4-1-9. The Local Plan Policies Map "shows key sites for development and the planning areas where the policies apply"; but this map has many blank areas, so do we infer that planning policies do not apply to these? It would be better if the Plan policies applied to all areas, while in some areas more detailed policies apply. For example, some development policies for five Town Centres do not apply to two others (Kentish Town and Hampstead); there are currently two Area Action Plans, but there are other 'areas' discussed in the document; and the Plan at present only specifies two Neighbourhood Forum Plans when there are already 6 further Fora working towards plans. The writing needs to be more generalised so that new areas can be included in the future – or some removed after time.

Re 1.10 The Plan should clarify how Camden will achieve inclusive planning so that all communities can contribute to local planning where there are not formal Neighbourhood Fora. For example, our local community submitted the proposal in 2013 for a North Camden Town Neighbourhood Forum. But this was not taken up by the Council – the reason stated by the officers ('we are expecting too many applications') and by Members ('it crosses ward boundaries, so we can't work with it'). How will our local views be included in local planning apart from Councillors? The Local Plan should clarify the difference between Action Plan, Town Centre and Neighbourhood Plan, and demonstrate how communities outside these structures will also be engaged in planning. Otherwise, this will increase inequalities which is contrary to the Camden Plan.

Re 1.11. The Local Plan should clarify the legal strength of a Neighbourhood Plan. The Plan says “it will be taken into account alongside the Council’s other plans when making decisions on planning applications in that area”. That implies it is subservient, since it is the Members who are making decisions, with all their own existing plans and policies, not the local community’. Yet these Plans are – according to the hierarchy map – equal to the Local Plan. Moreover, the Plan words only specify an impact on ‘planning applications: what about the full range of policies – eg transport, business, health – within the Plan?

1.13 The Council’s Supplementary Planning Guidance (SPG) *should* “have the same weight in decision making as Camden development plan”. SPGs have been developed over years, reflect considered judgement and are open to change and updating. For the LP to describe them only as “important supporting documents” devalues their content and will lessen the Council’s powers for increasing growth, reducing inequality and maintaining sustainability. Another formulation is needed to confirm SPGs as fully within the Local Plan.

1.19 We responded to consultations on the Draft Local Plan in 2013 and 2015. The specific concern of this response is for greater recognition for the locality of North Camden. We have taken up the Council’s request to engage in revision of the local Conservation Area Appraisal [NB miss-spelled in the Figure], as this represents our only on-going local representation on planning issues. We have contributed to the consultation Statement of Community Involvement, and to the occasional site-specific consultations (which, however, have benefitted the developers and Council but less the local community’s views). The Council’s Planning Newsletter is a welcome information source. But the Council should create a system for greater continuing discussion on planning issues outside the Neighbourhood Fora areas, to discuss how a local area is changing across social, economic and physical fields. (The London Plan 2015 recognises that there is continuing change.) Members are an insufficient mechanism, because they do not hold regular discussions of planning locally, and state that they can’t discuss specific applications because they are restricted as members of the Development Committee. The recent work on basements is an example of a sensitive issue where community views impacted on Member’s practice. There should be mechanisms for channelling concerns on neighbourhood level issues. Perhaps electronic media – as a forum for neighbourhoods and localities – would be a cost-effective start.

1.21 The Plan should demonstrate (somewhere) how the Submission Draft has taken the impact (and viability) assessments into account, not simply state they have been made: they themselves can have no impact if not responded to.

1.22 The collection and analysis of information is crucial to an informed plan. However, the listing given appears skewed just towards ‘economic growth’. A proportion of Camden ‘residents’ are quite transient: where are the data on migration

in and out of *people* rather than cross-sectional population? On economic activity levels: is there detailed description of employment by locality, and how this is changing (and predicted to change further)? On implementation of Camden's SPGs within existing properties and areas (or indeed, whether implemented after development control)? etc.

2.3 The population projection, while stated by GLA, is 'predict and provide': the population can only rise if the housing density proposals of the LP are implemented. While the 'push' is from national and GLA plans, and 'pull' is from higher revenues to the Council, it would be welcome for the LP to acknowledge the interdependency: the Plan says there *will* be an increased population *therefore* we must build. It should say, *if* Camden builds (so-called 'growth') *then* more people will live here - accepting that overcrowding will probably remain at the present unmeasured but tolerated levels. [A graph of data of the recent past and the proposed future, for per capita income and population levels, would be welcome as evidence, rather than a photo of the telecom tower.] It would be welcome for data also to present Census turnover, and the proportions of population born outside UK, in this increased population. For whom are we planning?

2.7 There are two major problems with this paragraph

a. while homes and services match directly with Camden residents, employment does not. No data are given in the London Plan of the proportion of people entering / leaving the borough to/ from Camden homes for work: creating employment must be a co-operative pan-London objective. Instead LP should argue to retain – and improve the quality of – existing employment to enhance local sustainability (better micro-economies / greater money flow).

b. 'communities where nobody gets left behind and everyone has a chance to succeed' seems an in appropriate slogan for a formal Plan. When some 'succeed', others (voluntarily and involuntarily) are 'left behind'. There will be fathers leaving families, adults migrating to Australia, people winning lottery tickets, people falling into addiction. A more nuanced formulation is needed, perhaps using 'fairness'.

Re 2.8 - 2.10 The Local Plan describes areas for proposed high density development to include "generally, the growth areas, Central London and town centres of Camden Town, Finchley Road / Swiss Cottage, Kilburn High Road, and West Hampstead". The 'London Plan's Sustainability Residential Quality density matrix (Table 3.2)' data in relation to Camden should be provided. The Local Plan should demonstrate what extent of change is proposed – from what to what, and where. Given that LP is a basic planning document, there should be clearer statements on the new expected heights and massing. An illustration 'before and after' would help public understanding. Kings Cross is exceptional because of the rather 'sealed' boundaries: consider the current concern with the proposal for building a tower within a nearby Somers Town estate. The town centres listed are

already strongly built upon. (It is welcome that neither Kentish Town nor Hampstead are included in this Town Centres list.)

Re 2.17 LP describes “many parts of Camden, particularly in the northern part of the borough” as “predominantly residential”. It would be welcome for LP to recognise also the central areas of Camden, that are also both residential and light industrial and with richer historical character than the northern suburbs, as equivalently expecting ‘smaller scale development and incremental change’ outside the ‘town centres’.

2.45 and 2.53 emphasise the importance that town centre developments respect the character, heritage and conservation of adjacent areas. In Camden Town there is a significant hazard. It currently has both a substantial daytime visitor (frequently overseas) clientele for the ‘central’ market area, and a night-time music and clubbing clientele that is more from London. This distorts its other purpose as a central ‘Camden’ shopping street. Development has been uneven, as the different customer groups have different priorities. The daytime crowds and night-time good-timers have reduced the ‘sustainability’ of Camden Town for its local residents. At times the street scene is squalid and offensive. It is vital that the Local Plan separates this profit-seeking area of ‘Camden Market’, which residents have to negotiate around, from the adjacent residential and light industrial areas which are the ‘community’ of Camden Town. The challenges (and achievements) of improving Camden Town up to acceptable levels of environment should be stated in the Local Plan. The benefit for ‘additional shopping floorspace’ proposed in the Local Plan is not demonstrated: it does not seem to be for local users. The Plan should define the expected projected numbers of users of Camden Market, how Camden will ensure a limit to the excessive crowds who currently overwhelm Hampstead Road, and how the local economy will be enhanced for local residents separately from the Market.

2.55 – 2.72 CIP is large programme for re-cycling existing assets and the development levy into focused site improvement. There is a balance to be made between use for Camden’s social housing and the wider public domain. There should also be attention to using CIP as support to improve the (often poor quality) private rented and local retail sectors: it is logical to improve all forms of housing, and also environments such as shops which the public use as well as the wider street and public gardens environments. It is misleading that the Local Plan, which is a document forward for 15 years, gives as much attention to the areas already chosen - Gospel Oak, Somers Town, Camley Street: these should be the subject for specific reports and neighbourhood plans. It would be welcome for the LP to set out forward principles and vision for use of CIP, or other major public resources, over the 15 year period and how it will contribute directly to the wider LP objectives. A framework which showed how CIP complements private development investment (or its lack) would be welcome.

2. Protecting amenity

The section is headed 'Protecting Amenity' but immediately diverts to 'managing the impact of development'. It needs an initial vision of *enhancement* of amenity as a collective and guided policy – a concept also for the 'neighbourhood plans'. The Local Plan should demonstrate how supportive policies can complement the 'restraining' policies of 'development' listed in Section 6. It should have a vision (Camden Plan?), otherwise there is just the daily bargaining of 'development' without a larger objective. [See, as a positive example, the statement at Policy A2] to 'work with partners to preserve *and enhance* the Regent's Canal'; 'enhancement' is also described for policies p and q in Open Spaces.]

Open spaces

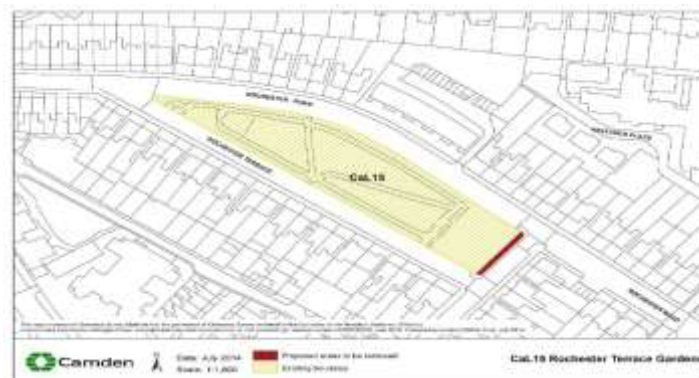
Reviewing the Consultation Alterations Maps, it is welcome to see the new incorporation of a stretch of tow-path adjacent to the London Electricity waterside site at Georgiana Street / St Pancras Road canal bridge. The London Electricity site (included in Camden's Allocations) is built above the River Fleet, which could be opened up again as public space.



OpenStreetMap 2016

(By contrast, there was a loss of public amenity because of no tow-path in building the high-rise housing on the canal along the east side of St Pancras Way.)

A further consideration is the Map 70. CaL15 - Rochester Terrace Gardens



This map (inaccurately) still retains the pathways, entrances and exits from before the renovation by the Council in 1997. It therefore does not adequately explain the 'proposed area to be removed', although this is possibly the current highway pavement. Equally, the north west end now has a double gate, with bollards, brick paving and one tree outside the railings. Is that also to be removed?

Section 6.43 The statement should read 'The Regent's Canal is Camden's only significant *open* watercourse'. The Fleet is Camden's major watercourse, affecting north, centre and south. Although it is only a 'watercourse' in the Environment Agency's hierarchy, it has important impact on ground water and flood potential. Thames Water (which takes on the mantle of Holborn and Finsbury Commissioners of Sewers from 1811) states it has no responsibility for rivers and watercourses (the Arup Hydrology Report also suggests significant inadequacies of information available from Thames Water). The Fleet historically formed the backbone for Camden (radial roads either side of it) and was also a significant 'open space'; its lower reaches can still be visited as sewers under Holborn. It is fully ducted, but free water also flows along its path. This section should show how Camden will ensure the well-being and greater recognition of the Fleet. For example, in 2013 RIBA awarded a prize to the architectural practice [4orm](#) for a proposal to re-open the Fleet in the gardens near St Pancras Old Church. There are also significant impacts of the Fleet for basement impact assessments. A clearer approach to the Fleet would be welcome.



Policy CC3. Watercourses in Camden

The following discussion is presented in relation to north Camden Town

Para 8.59 states that "surface water flooding [] arises following periods of intense rainfall when the volume and intensity of a rainfall event exceeds the capacity of the drainage system". It identifies Local Flood Risk Zones, previously flooded streets (map 6) and 'Reference should also be made to Environment Agency surface water maps'. Here is the EA surface water flood map for north Camden Town.



Environment Agency. Interactive map - Risk of flooding from surface water. Dark blue is a 'high risk' of flooding, more than in 30 years.

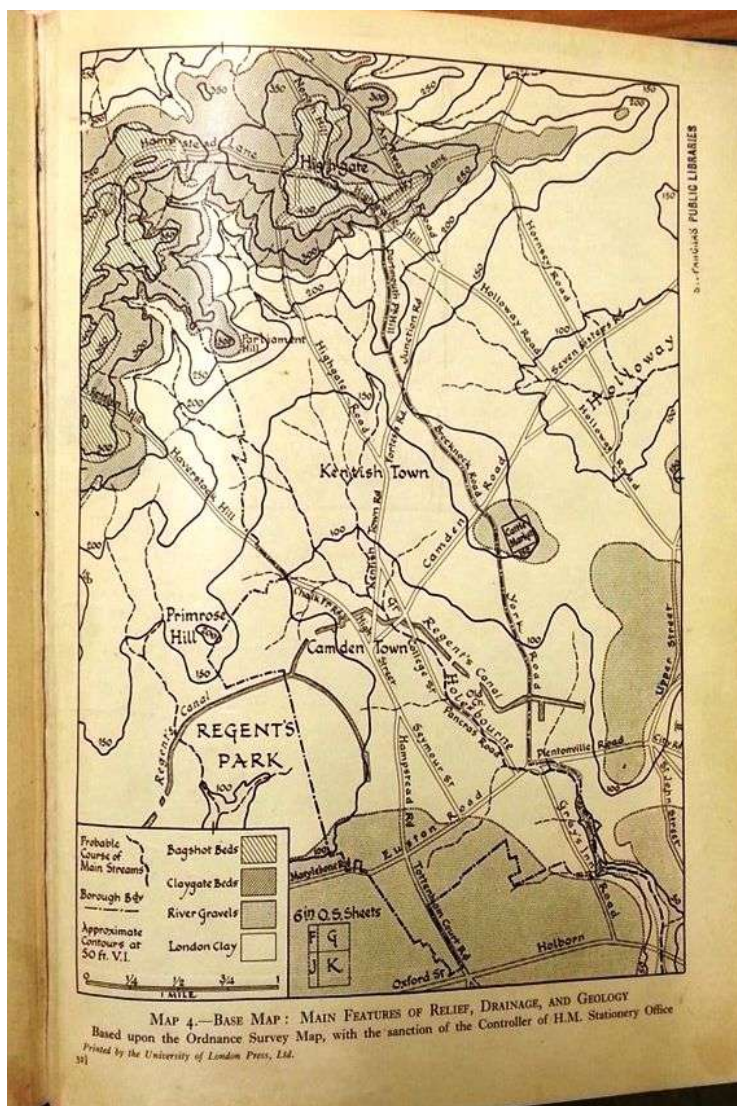
8.60 states that in “the south east of the borough ... flooding to property already occurs” and describes “twelve Local Flood Risk Zones (LFRZs) [which can] affect houses, businesses or infrastructure”. It would be helpful for this paragraph to refer to Local Plan Map 6 showing the zones are not in the southeast but across the borough.

8.61 states that “Camden also has a small risk of groundwater flooding and refers to the Strategic Flood Risk Assessment (2014). Flooding may be “from ‘perched’ groundwater, water that becomes lodged between the top layer and the impermeable London clay layer”, recorded in the west of the borough. It says also “Aquifer based groundwater flooding is relatively rare in Camden, but it is possible in areas around Hampstead Heath and in the very south of the borough. This occurs when the water table rises due to prolonged heavy rain.”

The Strategic Flood Risk Assessment appears to be deficient in its assessment of the Fleet River. Its report indicates only two references – documents from a student group report from the Bartlett at UCL in 2008, and a cross-London high level report from Mouchel in 2007 (references 26 and 27 in the report). SFRA claims that “the River Fleet became entirely enclosed in the 19th Century and is now fully incorporated into the TWUL sewer network”. This statement is also included in Camden’s Flood Risk Management Strategy (p12): “While historically Camden had a number of rivers including the Fleet and the Tyburn running through it, these were incorporated into the sewerage system in the 19th century.”

But publicly available maps (eg OpenStreetMap) show the (ducted) Fleet follows a line independent of the sewerage system. Indeed, the original responsibility of the Holborn and Finsbury Commissioner for Sewers was to prevent flooding, not to provide refuse disposal.

In Cooke's 1934 map, a branch can be seen rising up between Camden Road and Kentish Town Road reaching up towards the crest of the borough boundary with Islington at Brecknock Road.



Map of the Fleet (or Holebourne): Emily Cooke, Geography of St Pancras, University of London 1934 (Camden Local Studies Library).

The Environment Agency's mapping of surface flood risk in Camden equally demonstrates the topography of the ground water beneath, southeast from Hampstead to Kings Cross, shown here for north Camden Town. The SFRA says (para 4.3.4) "a number of groundwater flooding incidents have been recorded outside the areas of Increased Potential for Elevated Groundwater".

The SFRA places Kentish Town, Primrose Hill and Camden Town in a 'south Camden' catchment and says (Section 6.5):

Camden South does not have the same level of flood risk as the north of the borough.

In the south of the borough only the Primrose Hill area was identified as having any significant risk.

The only remaining risk is the inverted siphon under the Grand Union canal along Gloucester Avenue,

Surface water run-off from significant areas of Camden drains into the former Fleet River, which has now been fully incorporated into the Fleet sewer.

Should new evidence of flooding or the risk of flooding be revealed, the plans for the south of the borough will be reassessed.

But there is evidence of regular ground water flooding in north Camden Town

- Sainsbury's vehicle entrance, in Kentish Town Road, has regularly flooded
- Rochester Terrace Gardens has annually flooded in heavy rain.



Historically, Kentish Town Road was called Water Lane and had a pond within the Fleet (to the east side, at the point where now is Camden Gardens and the railway viaduct. Similarly, there were four ponds along St Pancras Way (then called Kings Road) – see 1801 Thomson map:



Thomson map of St Pancras, 1801

Camden History Library holds public health drainage correspondence (dated 23 June 1924) for 79 Camden Road, which states that “a clean water spring has been found” during building for the Hilger optical instruments works. This site was at the junction of Camden Road and St Pancras Way – along the line of ponds.

Existing borehole data for Shirley House on Camden Road (1960s) and 152-156 Kentish Town Road (2016) show that the top layer can be soft clay, sand and gravel, potentially aquifers, at 1-3 m below ground level. Camden’s local flood risk zones therefore should be altered to include the mid-Fleet, from Kentish Town south east to St Pancras, above the lower Fleet zone that is identified in SFRA Fig 6

The Local Plan should review evidence for groundwater flood risk along the Fleet valley and its escarpment, gain better information about the linkage between the Fleet tributaries and Thames Water sewers, and emphasise the significance for basement development. Since the Regents Canal is regarded as high risk for flooding at Camden Town, the Plan should also review the Fleet and Middle Level Main Sewer crossing beneath the Regents Canal.

3. Design and Heritage

There should be an introductory sentence

7.0 Good design is needed for development in Camden, and heritage and character should be protected and enhanced across the borough.

The point of this sentence is clearly to link design with heritage and character (the present structure treats the two aspects of Design and Heritage in separate sections) and to indicate that heritage and character are dynamic (‘protected and enhanced’) as well as descriptive.

Policy D1, Design, states that Camden will require development that (a) respects local context and character; and (b) that “preserves or enhances the historic environment and heritage assets in accordance with Policy D2 – Heritage”. Policies D1 and D2 are therefore closely linked.

The Local Plan subsumes context and character under Design. However, the London Plan SPG (2014) defines Character and Context as:

Character is created by the interplay of different elements, including the physical or built elements that make up the place, the cultural, social and economic factors which have combined to create identity, and the people associated with it through memories, association and activity.

Context can be defined as the way in which places, sites and spaces inter relate with one another whether physically, functionally or visually, or the way in which they are experienced sequentially and understood.

Therefore Policy D1 should include ‘cultural, social and economic factors’, and also ‘memories, association and activity’ as design objectives, as well as cross-referencing to other Policies within the Plan of relevance. The point is to emphasise and enhance the dynamic, social nature of areas as concerns for design equal to their form: prize-winning buildings can be weak in social coherence and vice versa.

Para 7.6 is of particular concern. It states how the Council will address Context and Character. The paragraph text should be changed to:

7.6 The Council describes the character and appearance of areas in Neighbourhood Forum strategies, Conservation Area Statements, Appraisals and Management Strategies, the Camden Character Study and other materials including Archaeological Priority Areas, reports through Camden Local Studies and Archives as well as local community involvement (including conservation area advisory committees). Developers should inform themselves of the special character of the area of their proposal and we will take this into account when assessing all developments. Policy D2 - Heritage and Conservation provides further guidance on the preservation and enhancement of the historic environment. When assessing design, we will also take into account guidance contained within supplementary planning document Camden Planning Guidance 1: Design.

The Council has followed London Plan SPG 2014 guidance in character and context studies. However, para 7.6 is incorrect to imply that the conservation area statements and the Character Study are equivalent documents.

There have been Conservation Areas in Camden since the 1970s, and Appraisal and Management Statements have been made iteratively. By contrast, the Draft Local Plan (2014) Character Consultation – Design and Heritage proposed: “To commission a character study to assist the Council when assessing planning applications outside of Conservation Areas”. The 2015 Character Study has been published since the consultation on the Draft Local Plan. The Character Study (CS) may ‘assist’, but it does not match conservation statements because (a) it is incomplete (b) its focus is different.

The Character Study is a technical document. In contrast with conservation area statements, it “seeks to identify where there is opportunity for improvements that could improve the *functioning* of an area, *address* urban design or character weaknesses or offer potential for intensification and could therefore *deliver* much needed new *homes to provide for Camden’s expanding population*”. This is not equivalent to conservation management and appraisal statements.

London Plan SPG (para 7.34) warns “... it is important to record and communicate all values, not just the values applied by professionals. In making decisions about future management and change for an area, these multiple values will need to be balanced together, relative to each other and spatially.” However, the Character Study was not undertaken in collaboration with conservation areas, nor other locally-informed groups. And the depth of description is much less than that of conservation area statements.

A major concern is that the Character Study has ignored Camden’s 3 year’s work on local listing (more than 400 properties, public or green spaces or street objects considered by 2015, many submitted by local people). Local listing in Camden only focused outside conservation areas – ie the same areas as for the Character Study areas. The limited quality of the work is demonstrated by the Study ignoring Camden Broadway conservation area altogether (see below).

Thus:

(a) in comparison with conservation area statements, the Character Study has not been systematic in mapping all localities to detailed level;

(b) conservation area statements have not aimed to identify areas for ‘change’ (although they have suggested properties with ‘negative contribution’)

(c) conservation area statements do not describe ‘employment areas’, nor seek ‘to deliver much needed new homes’

Further, the CS proposed fifteen ‘neighbourhoods’ with a focus ‘in most cases a town or local centre’. But these ‘centres’ *overlap* with conservation area boundaries. There may be merit in working towards agreed ‘neighbourhoods’ Camden has designated town centres and neighbourhood centres for shopping (Local Plan Chapter 9) rather than for heritage. But ‘centres’ should not exclude ‘peripheries’: for planning, the whole borough should be covered by a consistent approach. Moreover, Camden has no designation of a ‘local centre’, nor is it defined in CS.

On the other hand, areas with different characteristics are linked together. This problem is exemplified in the area around Camden Road Station: some parts are missed by CS (eg under the railway arches) and some parts overlap with conservation areas (see Fig 1.4 and Fig 2.14).

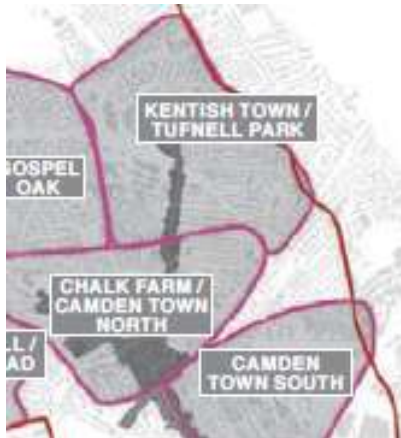
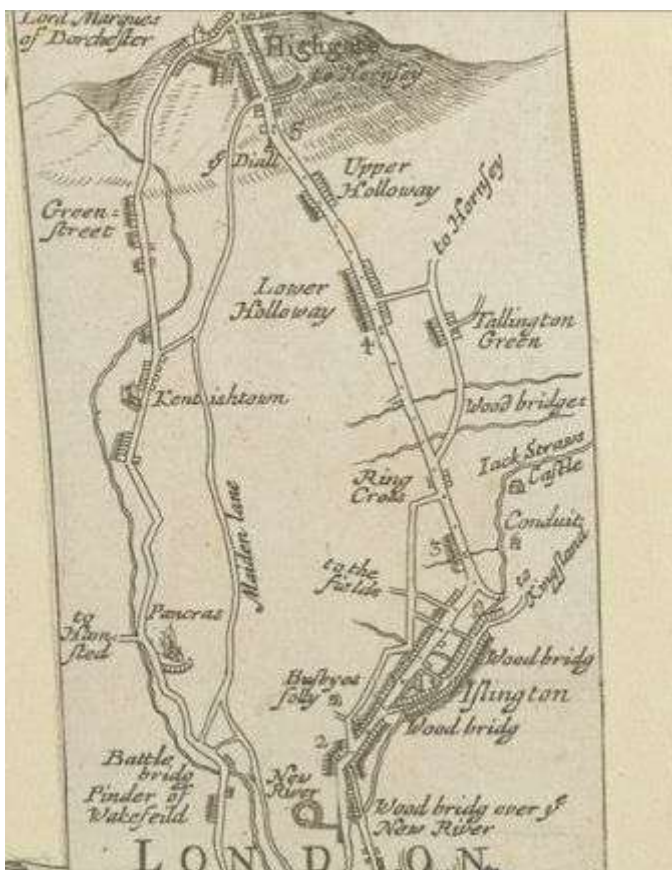


Fig 1.4



Fig 2.14

Character Study (p27) has sought to describe the 'historic' roads in Camden. Yet, rather than Camden Road, it should state that the oldest main road – from Mediaeval times – is St Pancras Way (sometime Grays Inn Road / Kings Road) which provided the axis for St Pancras borough along the River Fleet from Highgate to London:



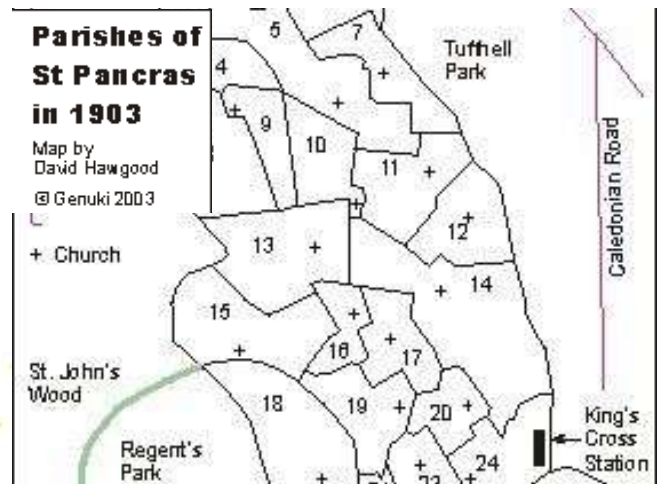
Camden Road Station was originally called Camden Town Station. In the early twentieth century the intersection of Camden Road and Royal College Street was a busy retail area. 'Camden Town Centre' is now designated around Camden Market,

with Camden High Street and Hampstead Road as its axis, while north Camden Town continues with its separate identity, associated still with St Pancras Way.

The Character Study should identify north Camden Town along the south-east / north-west axis, from Kentish Town Road at the west, across Camden Road to the north London railway line (partly now called 'Camden Broadway'), all NW1. This, indeed, was formerly the ecclesiastic parish of St Andrews (the church demolished in the 1950s, for Agar Grove Estate).



Proposed conservation areas, 2016, north Camden Town



Church 14 = St Thomas Elm Road

The 15 broadly-drawn Character Study 'local centres' across Camden do not accurately match the detailed road maps provided in each section. The south-east border for North Camden Town should be the North London railway line: there is little movement across the railway line, and these areas move towards Camden Road station intersection. Also, the workshops under the railway viaduct, entered from the north side at Baynes Street, should be included. Camden Broadway conservation area stretches across Royal College Street.

While the Character Study supposedly identifies conservation areas (Map 3.4), the maps for Camden Road, below, are incorrect – they do not show Camden Broadway conservation area (created 2007), only the shopping neighbourhood centre.



Fig 5.45 Rochester, Jeffreys CAs.



Fig 5.49 East and South Camden Town

South Camden Town has its own character, and should not include part of Camden Square Conservation Area, which is Camden New Town, the most northerly part of the Camden Estate to be built 1860s, nor Agar Grove and Maiden Lane estates (which are both rebuilding but are separated physically and very poorly accessible from Camley Street). [Further detail for North Camden are provided in the application for north Camden Town Neighbourhood Forum in 2013, and the Draft Rochester Conservation Area (2016) attached to this submission.]

Considering the three 'areas' proposed for north Camden in CS (CF13, CF14, CF15):

CF 13 is indeed post-war housing, but the two blocks have rather different character. Bernard Shaw House is contemporary (early 1950s) with St Pancras Way Estate (both being rebuilt because the site of V1 bombs), while Foster Court (now being partly sold to tenants) was a product of the Council's 1960s destruction of Victorian terraces. They share grass and a playground at the back, but Bernard Shaw Court is ringed by (later) garages, and there is no through passage. It is of note that 189-193 St Pancras Way is an original Georgian locally listed villa currently outside the conservation area.

CF14 'Camden Road North' includes a strongly varied set of buildings which deserve better attention than the designation 'mixed'. Working from the north downhill:

- While Camden School for Girls is separately identified in Sandall Road, it also forms an 'education' the frontage on Camden Road;
- the student residences at 109 Camden Road (and Whitcher Place) have specific residential, not 'mixed', use;
- Nos two semi-detached early Victorian villas;
- Cherry Tree Court (1980s), purpose-built social-care housing;

- 1960s residential block, set back with ground-level shops (originally a petrol garage / showroom);
- Low-rise social housing apartment blocks with back gardens (1975) built by Camden Council;
- The current building site (165 residential units) of 79 Camden Road.

Rochester Mews,

- warehouse;
- 5 mew houses properties;

Rochester Place includes,

- a 4 storey 2010 block of commercial (clothing wholesale) with residential above;
- a light industry with residential over;
- and light industry.

CS calls this area ‘fragmented’ but it is better understood as a range of both residential and industrial sites. [79 Camden Road/St Pancras Way/ Rochester Place was the headquarters of Hilger & Watts (1900-1974), optical equipment manufacturers employing 300 people at its peak in the 1950s.]

CF 15 is wrongly called ‘Rochester Square’ (which is the original Victorian rows north): the area is the 6 blocks of St Pancras Way Estate that is locally listed, and also a remaining former Camden Road semi-villa (historic doctor’s surgery) and Puja Court, 1980s ‘community’ housing.

Maps 4.3 and Fig 4.4 supposedly demonstrate separate ‘employment’ and ‘residential’ areas, yet in practice these are overlapping uses.

Finally, Character Study has both missed Camden Broadway conservation area, but also the North London Line has workspaces / employment *underneath* the viaducts which needs attention

Character Study has created a new category for influencing planning in Camden called “Opportunities for improvement”, described on p12:

Have a built form that is out of character with the surrounding area;

Are dysfunctional and impact on the wider functioning of the neighbourhood (sever connections, reduce legibility, create ‘no go areas’ etc);

Are currently occupied by low density development and could be intensified; or

Are occupied by a use that may be considered inappropriate (eg land hungry employment uses / storage and distribution close to urban centres).

As ‘opportunities for improvements’, CF13 is regarded ‘Medium’, CF 14 ‘high’ (‘fragmented’, with ‘urban design weaknesses’) and CF 15 ‘low’. However, neither

the criteria nor these (and the other) designations in Character Study cannot not yet be taken as policy: they have not been fully explained nor publicly debated.

Moreover, there is underlying inconsistency: the Character Study map designations apply only to the non-conservation area small areas, yet the criteria include ‘the surrounding area’, ‘wider functioning of the neighbourhood’, density of development and employment uses (dismissed as ‘land-hungry’ or ‘close to urban centres’). These are wider issues of the urban grain that are not included in conservation area statements.

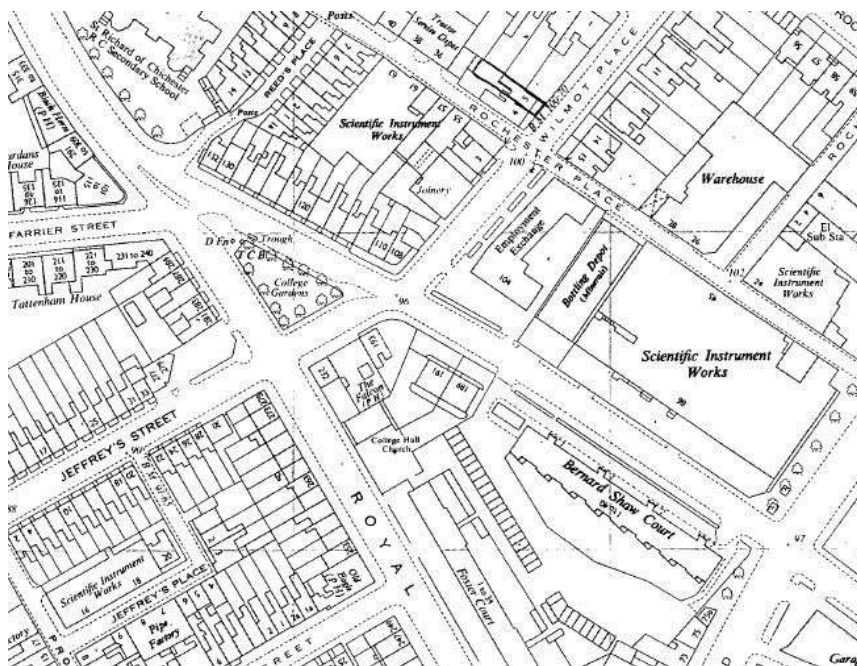
It will be welcome to join the conservation and non-conservation areas into coherent local planning areas, with the boundaries revised appropriately after local consultation. It will be necessary to consider how neighbourhood area boundaries match conservation areas (eg Regents Canal stretches across four local areas, while Rochester, Jeffreys and Camden Broadway are within one neighbourhood of Camden Road). It will be important to gain local knowledge for mapping employment and residential uses: for example, north Royal College Street, within Jeffreys Conservation Area, is currently not included in Camden Road Neighbourhood Centre although is included in Camden’s annual retail survey; equally, Rochester Place includes a significant mix of trade employment spaces that need to be strengthened (‘enhanced’) against further change to residential (‘more housing’). And it is important to put more effort into protecting and enhancing shopping areas, whether they are within conservation areas (Camden Road and Royal College Street shops in Camden Broadway Conservation Area).

The CS (very briefly) proposes five areas as ‘opportunities for improvements’. No 4 of these is Camden Road: “The approach to Camden at the southern end of Camden Road is fragmented and poorly defined with a mix of poor quality housing and under-utilised employment buildings. There is potential to regenerate this area and deliver a new gateway into Camden Town.” This is a misrepresentation. While the bridge – repainted 6 years ago without local consultation – says (Camden Town on the north side, Camden Road on the south side), Camden Road has its own character, not just ‘a gateway to Camden Town’. The area is varied in use and age of building, and the ‘fragmented and poorly defined’ adjectives are unsubstantiated on more detailed assessment, especially the St Pancras Road / Royal College Street/North London Railway axis (see Rochester Draft Conservation Area statement 2016). There is indeed potential to regenerate, but it is not by increasing building density, nor by continuing the loss of employment space (‘land-hungry uses’) in the demand for ‘more housing’.

In relation to housing, there should also be assessment of the actions of the past 15 years, which have seen substantial change of use from employment to residential: on St Pancras Way, the St Robert of Chichester School (50 units), the Employment Exchange (18 units), and most grievously the change of use of the Hilger & Watts

factory site (19 Camden Road, 150 units). In roads behind, Cosprop (28 Rochester Place, 12 units) and Pipe Factory (7-8 Jeffreys Place, 6 units), as well as several other units and roof extensions. In the twentieth century, much of Camden Villas along the north west side of Camden Road was rebuilt with three- to six-storey blocks, including the university residences.

The problem of 'regeneration' in the terms of development 'opportunities for improvement' are characterised in the recent decisions on 79 Camden Road. This site was originally set out in the 1810s as Camden Cottages, the first developments in the countryside along St Pancras Way, and in 1840s Camden Villas north up Camden Road. The side mews, Rochester Place, Rochester Mews and Whitcher Place, Rochester Road, Rochester Terrace and Wilmot Place, and Stratford Villas and Murray Street to the east) were also set out in the later 1840s. Various small workshops and small commercial enterprise developed along both mews (foundries, smelting, coach works in the Victorian period, later garages, clothing, now design and creative studios), while from 1900 Hilger's developed on several sites from 24 Rochester Place and expanding their manufacturing in the 1920-1960s. The full site employed 350 people at its height.



Hilger & Watts was an important scientific company, making original discoveries applied to optical instruments and publishing books (Frank Twyman, the director, was an FRS). Unfortunately, the company was taken over by the Rank Organisation in 1968, a multi-sector national company that destroyed value (and employment), and the company was split up and sold off. The building passed to ownership by a trade union, although it retained both workshops and offices that could have been maintained for employment, for example workshops for local design and media

companies. The facade had significant local heritage interest – except to the developers:



Instead, the site was sold by owners Camden Council (not within the Council's Site Allocations programme) to Barratt London after a bidding tender to the Council, with Barratt only buying if Camden gave full planning permission – a 'done deal'. The new building is oversize for the site and neighbourhood. It will be higher from street level than any building around, have occupied basements (not in the adjacent 1950s flats) more densely massed (St Pancras Way Estate has large grass open space and hedges), is closer to the pavement (destroys the building line of former gardens on both Camden Road and St Pancras Way), a facade without interest at street-level character, and no shops or workshops to maintain local economy. These aspects were presented by the public at consultation, but rejected for the development that Camden approved.

79 Camden Road is an example of Camden planning 'outside' a conservation area but in a 'character area' going severely wrong.

By contrast Local Plan 5.8 gives a more controlled view:

5.8 The Council has introduced 'Article 4 Directions' to remove the right to convert offices to homes without planning permission across much of the borough and secured an exemption for Camden's part of the Central Activities Zone (CAZ). Evidence shows that the demand to convert office premises to residential has been particularly high in Kentish Town, Camden Town with Primrose Hill and Kilburn where there are significant concentrations of premises suitable for start-up, small and medium-sized enterprises. This demand is linked to rising residential values which are making these types of conversions attractive development propositions. This raises a risk that the growth sectors, in particular creative industries, as well as small and medium-sized enterprises, will find it difficult to find suitable premises in which to locate and grow in Camden. ...Therefore, we will continue to use the measures available to us to protect such premises in the borough and ensure that new proposals do not result in a net loss of premises suitable for such uses.

Nevertheless, the 2015 revised Article 4 regulations do not cover 'most of the borough', as the Local Plan states, and have been substantially reduced in North

Camden, even though the statement says “the demand to convert office premises to residential has been particularly high in Kentish Town [and] Camden Town”. The Council was required to limit its designation by central government, but did not consult on this and has potentially created greater inequalities as a result. The designation has included the shops of Kentish Town centre but not those of Camden Road Neighbourhood shopping centre. Durdans House in Farrier Street and St Pancras Way (with no shops) is included, but not the estate agent at 343-347 Royal College Street & 116-120 Kentish Town Road.



Revised Article 4 zones – north Camden

Local Plan Map 81 includes an amended boundary for the Queens Crescent Neighbourhood Centre (p. 91). The Local Plan should also revise Camden Road Neighbourhood Centre to include shops on the north west side of Royal College Street that are included within the Retail Survey. Unfortunately much retail has been lost in Royal College Street – which is within Jefferys Conservation Area – as a result of weak planning control:



Existing neighbourhood centre designation



Retail survey 2015

The Local Plan says:

'7.39 Camden has a rich architectural heritage with many special places and buildings from throughout Camden's history (see map 6). 39 areas, covering much of the borough, are designated as conservation areas.'

However, Map 6 defines 40 conservation areas, established from 1968 (Hampstead) to 2008 (Mansfield). Areas such as Hampstead, Highgate and Bloomsbury are wide; those as Kelly Street and Hanway Street are very small. Both the north and south of the borough are mostly covered by conservation areas: central Camden, however, from Gospel Oak to Somers Town, is less well covered. Apart from Regis Road (Kentish Town), these are not the 'growth areas' designated in Local Plan.

Conclusion

These final points reflect the fact that the Character Study (albeit flawed) engages with wider concerns than Heritage and Design, towards the definition of character used by the London Plan SPG, and also the criteria required for Neighbourhood Forum plans.

How can the Local Plan best satisfy both Design and Heritage, and Character and Context both within and outside the conservation areas? While the Town Centres and Action Areas delimit areas for housing and business development, the rest of the borough, whether conservation area or not, requires systematic policies that maintain and enhance character. The present approach of the Local Plan, treating conservation and non-conservation areas with different criteria, is inconsistent and potentially enhances inequalities in the borough.

To enable a fuller appreciation of the needs for Camden Road, the draft Revised Rochester Conservation Area statement is provided as a separate set of documents.