

THE REGENTS NETWORK

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Fergus Freaney
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Camden Town Hall Extension
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16th May 2011

Dear Fergus Freaney,

LOCK KEEPERS COTTAGE Grade II Listed
289 Camden High Street London NW1 7BX
Planning Application 2011/1647/A
Regents Canal Conservation Area

I strongly object to yet another attempt by Starbucks to have illuminated signs on our historic Regents Canal Lock Keepers Cottage and Information Centre.

The Grade II Listed Lock Keepers Cottage is an important canal building and should be cared for and celebrated as an historic asset to the Regents Canal and the London Borough of Camden. It is located in a conservation area that is of special interest, and in a location that features no fewer than seven major Grade II Listed canal structures and buildings around the much valued waterway and picturesque basin.

The illuminated signs are proposed for promotion rather than just for information and directions to the presence of the coffee company. There is plenty of evidence that Starbucks is present in the Lock Cottage and further promotion or advertising is not acceptable.



Starbucks can make use of the Lock Cottage for the time being, but they have no business trying to take it over. The addition of prominent illuminated signs would have the negative effect of identifying the building as a Starbucks building, whereas it is nothing of the sort. It is an historic canal building and local information centre. If there are going to be any more signs on the building then they should be for the purpose of celebrating the character and special interest of one of our local heritage buildings.

When Starbucks moved into the building they were well aware that it was Grade II Listed and that it was located in a conservation area.

I disapprove of the intentions and actions of Starbucks to demean the cottage and the canal conservation area by attempting to make their company's commercial activities more important and prominent than our heritage and environmental assets. In effect they are trying to transform the Lock Cottage and Information Centre into a 'themed coffee shop'

Starbucks's intentions contravene policies

The importance of the Lock Keepers Cottage is recognised in the LB Camden UDP. In **Policy B4B Advertisements and Signs**, it is stated that “the Council will not grant consent for advertisements and signs that it considers to cause harm to . . . the visual amenity and character or appearance of conservation areas”. It continues that “conservation areas and listed buildings are particularly sensitive to too many advertisements” (Para 3.45). As the Starbucks signs are intended to alter the character of the building from a Lockkeepers Cottage and Information Centre to a Coffee Shop, then this policy is contravened.

In the Heritage section of the UDP at **Policy B6 Listed Buildings**, it says that it is a requirement to “preserve or enhance the character of listed buildings of special architectural or historic interest” when alterations are being considered. Prominent alterations in the form of illuminated signs would certainly “cause harm to the special interest of the building”.

Then there is the all-important **Policy B7A Conservation Areas, Character and Appearance** which deals with development in a conservation area where consent will only be given “that preserves or enhances the special character or appearance” of the conservation area. A very prominent (and lit up) Starbucks Coffee Shop does not contribute in any way to the Regents Canal Conservation Area as it does not have any historic or environmental relevance.

In **UDP Policy RC2 Building use along Regents Canal** the Council must consider whether the illuminated signs will enhance the “historic features and architectural quality of the building”, and there are no doubts that the Starbucks application is incompatible with this.

Policy Guidance

The way in which the above planning policies are interpreted and implemented in the case of a Starbucks coffee shop is given in advice contained in the **Camden Town SPG - Food, Drink and Entertainment Uses** February 2008. This policy guidance aims to protect the character and function of Camden Town, and manage the concentration of food, drink and entertainment uses, particularly in conservation areas (See paras 4.7 to 4.9). It is clearly directed that these uses should not cause harm to the character of the area, local residents, uses and activities.

Give canals respect says Mayor

The Mayor of London has plenty to say about the importance of waterways and their heritage in his London Plan. The rivers and canals of London have been designated as the Blue Ribbon Network (BRN). In the **BRN Principles** it is stated that the Blue Ribbon Network should be “respected as the location of a rich variety of heritage which contributes to the vitality and distinctiveness of many parts of London” (Para 4.141). That describes the Regents Canal at Camden Town very clearly.

The **Blue Ribbon Network Policy 4C.20 Development adjacent to canals** requires developments beside London's canals “to respect the particular character of the canal”. It then states that “canals within London have a rich and vibrant history, are an asset to London and contribute to its world city role” (Para 4.187). An American-based coffee shop cannot be said to contribute to London in the same way the canals and the historic Lock Keepers Cottage do.

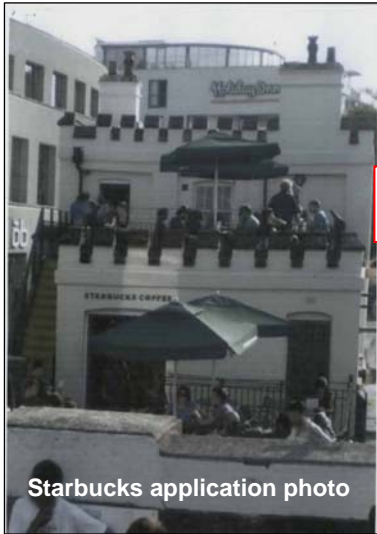
Some people are welcome

Business and leisure are welcome into the domain of the conservation area and the Regents Canal, but not the ones that operate in such a way as to downgrade and conflict with the attractive and historic location. There's far too much of that negative approach around the locks at Camden Town, and not only from commercial interests of Starbucks.

The manner in which Starbucks is dominating the canalside heritage building and taking possession of the Lock Keepers Cottage and Information Centre for a non-waterway use does not go down well. There is a lack of respect for the Blue Ribbon Network. I would like to see companies like Starbucks contributing to the Conservation Area and the Regents Canal.

Misleading information

It seemed surprising that a multi-national company such as Starbucks could not supply better a photo to accompany their planning application. A dull photo is provided with the customers in the 'garden' area blotted out because the photo is taken from behind the bridge wall for some reason. Of course the reason is that the company intended to influence the application by



falsely portraying an uninviting view of the coffee shop that is not well patronised. Also the Starbucks name over the entrance door is not very clear in their photo - by chance(?).

Did the applicants assume that the decision-makers were simple-minded enough to be taken in by this, and recommend spotlighting?

In reality, the coffee shop is clearly identified by a prominent sign (see right) on the side of the building which seems to have been cropped off the photo supplied with the application for some reason. Also the seating in the garden area with its branded umbrellas over the tables and chairs is a clear invitation to customers who are wanting a cup of coffee.



Then there are the dreaded 'A boards'. Starbucks daily obstruct pedestrians with three A boards, including one on the overcrowded High Street and another in the narrow pathway beside the locks. These are an annoyance to the thousands of visitors passing by who are not the 30 or 40 people who want a cup of coffee at that particular moment.

I did not think it would be necessary to provide a snapshot of the coffee shop occupying our information centre, but as Starbucks cannot supply anything competent, here is one.



The above photo does not exactly show a heritage scene, but Starbucks Coffee Shop is easily recognised. The patrons are enjoying a cup of coffee in the historic setting beside the Regents Canal, although they do not have any information about it, nor even the name of the canal.

Where are the heritage signs?

Rather having the Starbucks signs illuminated to make them more prominent, it would be more appropriate to have some information about the historic setting and the conservation area.

For a start, the entrance for what is called simply 'Starbucks Coffee' is the only single entrance (and exit) to the Information Centre, since the original side door is permanently locked and blocked up on the inside with cupboards and shelving. This was carried out without any planning consent.

Note: There is a sign on the side door saying "Fire door keep locked" even though it is inaccessible as a fire exit. It is questionable that it should be kept locked as it is the direct access to the Information Centre and has an information sign above it.

An entrance sign to the Information Centre could be installed over the front doorway as shown in the photo (right), and it need not be illuminated.

All heritage value should not be lost

Good access to the Information Centre could give a lead in promotion of the heritage value and interest in the area. The Centre could motivate the visitors and show how the Regents Canal and the surrounding historic area are a key feature of Camden Town and provide "an irreplaceable record that contributes to our understanding of both the present and the past" as pointed out in UDP Policy B6 (Para 3.55), and that they "are not harmed or lost". Starbucks could also gain much by visiting the Information Centre.



Thin end of the wedge

That the application is for a 3 year period is not acceptable, as it is customary for temporary development of this sort to become permanent, and usually by default. Even 3 years of greater domination and misuse of the Information Centre by Starbucks is too much.

Insufficient information provided

The application does not contain sufficient information for a planning assessment to be made. Apart from the very poor photos that are so misleading, there is no justification given for extra signs and illumination, and there is no assessment of their impact on the historic environment.

A way forward?

Starbucks should offer to assist the authorities and community in doing a better job for their customers, and giving them an enhanced experience of their visit to Camden Town, and something to take away with them which will be more lasting than a cup of coffee.

Recommendation

Even if clearer and more relevant information is subsequently provided by Starbucks, the application should be rejected as it is fundamentally flawed as detailed above.

Starbucks, having drawn attention to their mean plan for a complete take-over of the Lock Keepers Cottage and Information Centre, must now be subject to enforcement action. This should lead to some positive action on the part of Starbucks and the authorities in restoring the true identity and function of the heritage building.

I recommend that Starbucks withdraw the planning application without further delay.

PART TWO

THE TRUE IDENTITY OF THE LOCK KEEPERS COTTAGE

A consent for an information centre

Fifteen years ago there was a great deal of debate about the development of Suffolk Wharf (West) beside the Hampstead Road Locks on the Regents Canal where the Lock Keepers Cottage and its garden stand next to the 4-storey office building with Wetherspoons on the ground floor. East Suffolk Wharf was subject of a separate application for the Holiday Inn.

The site was used at that time by LB Camden as their waste and recycling centre, and planning permission (with conditions) for application PE9700702R3 was given in November 1998 for demolition of the recycling centre and the erection of a large office building with food and drink premises on the ground floor, and the conversion of the Lock Keepers Cottage into an information centre.

To make it quite clear, it was stated that the consent was given for “use of the former lock-keepers cottage as a canal information centre as shown on drawing numbers . . .”

A legal agreement for an information centre

There was a s106 Legal Agreement made for the consent of the office block and premises, which related to the provision of at least 51% of the floorspace of the Lock Cottage as an information centre and which was to be fully equipped to the Council’s satisfaction. The Legal Agreement stated that “the Grade II Listed Building within the site shown edged in Green on Plan A annexed here to be restored and restructured by the owner to enable it to be used to provide the Canal Information Centre” (Para 2.22).

A ‘permanent’ information centre

The s106 Legal Agreement also stated that “the Owner shall ensure that the Canal Information Centre shall thenceforth be retained in operation permanently and managed in strict accordance with the version of the Information Centre Management Plan approved by the Council” (Para 6.7).

Refreshments an ‘optional extra’

There was no arrangement at that time for a multi national coffee shop to dominate the Lock Keepers Cottage, and the provision of refreshments etc was a supplementary facility, said at the time to be for the benefit of the community use of the premises and visitors to the information centre. The s106 Legal Agreement said that there were to be “ancillary areas equipped and laid out to provide for the sale of retail goods and non-alcoholic drink and hot and cold food for consumption on or off the premises” (Para 2.7 ii).

Starbucks takeover not legal?

The way the coffee shop has been operated over the past few years does not accord with the planning consent and is hardly an ‘ancillary’ provision. As a result the Information Centre for all practical purposes has ceased to operate. It has not only been a matter of inadequate management by the owner British Waterways and the Council, but the Information Centre has been forced out by the uncontrolled domination of the Starbucks commercial pressure.

There is not even a proper entrance to the Information Centre, and visitors who find their way into the coffee shop cannot access any information as the area is crammed full of Starbucks patrons at the tables that fill the premises. Recently an Australian family attempted to enter the information centre when I was there a couple of weeks ago but they gave up in despair.

The Starbucks planning application for illuminated signs to further establish their dominance contravenes the planning consent and legal agreement, and should not be countenanced.

PART THREE

MORE PROBLEMS WITH THE LOCK KEEPERS COTTAGE

NO PLANNING CONSENT

Starbucks have contravened planning regulation in a number of instances, apart from the elbowing out of the information centre. Enforcement action should be taken.

1. The corporate umbrellas have appeared although the company is aware of the need for planning consent.



2. The Information Centre entrance door is now permanently locked, with an improper sign for it to be kept locked.



3. Cupboards have been constructed against the side door entrance preventing it from being used, and without consent.



Note: Fire safety may be compromised as there is no easy escape route from the rear seating area now that the side door is completely blocked off. If there was a fire the occupants of the rear room would have to exit through the coffee preparation area even though this is the most likely location for any fire. This is not safe, and the public are at risk. The premises should be closed until the side door is re-opened as a fire exit.

4. The A boards that are daily erected around the Lock Cottage obstruct the huge number of pedestrians that visit the area. Nearly half of the narrow pathway beside the locks is blocked by on A board, and a second one is on the overcrowded High Street. The increasing number of A boards in the area is a serious nuisance and a hazard, and the Council should take control of the situation and have them removed. There is no way that the A boards should ever receive planning consent, especially in a congested area such as Camden Town.



5. Advertising banners are displayed without planning consent on the Lock Cottage by Starbucks from time to time. The photo shows that the fixing hooks (ringed) are driven into the Grade II Listed structure of the Lock Cottage which is a serious offence,



6. Starbucks is using more than 49% of floorspace area for refreshments, contravening the planning consent.

7. There have been extensive alterations to upper floor and balcony area which do not seem to have had consent.

LANDLORDS LOSE THE PLOT

British Waterways, the landlords of the premises, are a seriously flawed organisation, and their negligence of the proper management of the Lock Keepers Cottage and Information Centre is unforgiveable. It has taken some effort to make BW pay even the slightest attention to the Information Centre and to supply waterway leaflets on a regular basis. They have not carried out their duty to train Starbucks staff to assist with supplying information to the public.

BOROUGH TO MEET RESPONSIBILITIES

The Council have also been negligent, as for years the "Information Management Plan" for the Information Centre has not been carried out as prescribed in the s106 Legal Agreement (Para 21.2).

Camden have not monitored the changes that have been made and which now contravene the planning consent and the legal agreements. Why not? The borough's heritage and environment has suffered as a result, as well as the service to the public.

Incorrect title The above planning application is perversely titled on the LB Camden website as 'Starbucks Coffee Shop' whereas the correct title for the subject building is 'Lock Keepers Cottage and Information Centre'. This very revealing error on the website should be corrected forthwith.



NOT A GOOD TRACK RECORD

Apart from the poor attention of LB Camden to this highly sensitive and important location, the international coffee shop itself also has a poor track record, as shown above.

A summary list of the sad performance of Starbucks Coffee Shop includes:
Pushed out the Information Centre facilities; Not attempted to give information to the public and visitors; Not taken up training to carry out promotion of information of the area and the Regents Canal; Blocked the entrance to the Information Centre; Taken up more than 49% of the building for their commercial purposes; Nowhere have they promoted the Regents Canal; Ignored that they are in a conservation area; No emergency or fire exit provided for rear room; In effect Starbucks have transformed the Lock Cottage into a 'themed coffee shop'.

Yours sincerely

Del Brenner
Regents Network and
a member of the London Waterways Commission

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c.c. Cllr Chris Naylor; Cllr Patricia Callaghan; Cllr Thomas Neumark; Cllr Matthew Sanders
Chair, Regents Canal CAAC; LB Camden Conservation Area Team; Camden Town Unlimited