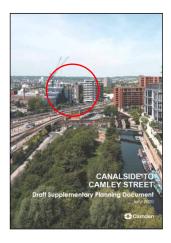
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# A WATERWAYS AND OPEN SPACE RESPONSE TO THE CANALSIDE AND CAMLEY STREET SPD OVERDEVELOPMENT PROPOSALS AND DEVASTATION OF OPEN SPACE AND THE REGENTS CANAL

LB Camden Canalside to Camley Street Draft SPD July 2020 - OBJECTION



This front cover to LB Camden's latest SPD has a sad story to tell about the borough's current pile of buildings that has spread the overdevelopment of the Kings Cross confusion on towards the heart of Camden Town.

Look at the monstrous out-of place 101, 102 and 103 Camley Street (circled) multi-storey developments alongside the Regents Canal that are featured centrally in LB Camden's chosen view of part of Camden Town that the planning department seems to be favouring for alien high rise development, contrary to planning policy and good order, in contrast (and opposition) to the characteristic Camden Town low level buildings and terrace housing.

This borough offensive is objected to, although firmly guided through the planning committee by LB Camden who should take a more even-handed role.

The huge and ugly buildings have burst out of the Opportunity Area boundary that <u>limits</u> the Kings Cross development area. This 'opportunity creep' is strongly promoted by LB Camden although it goes against planning guidance that Camden should be respecting and complying with – on our behalf – rather than going out on a limb.

### More to come!

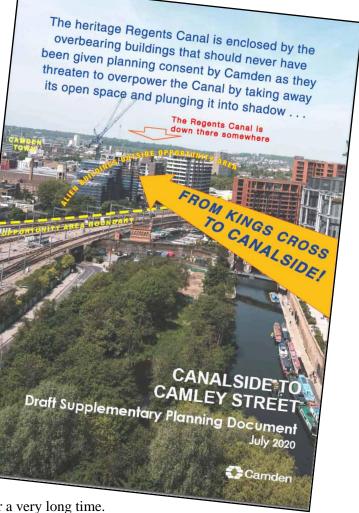
And there is more overdevelopment to come through the draft SPD which seems to be a LB Camden wish list rather than a well crafted vision of the long term future for this important Camden Town neighbourhood of London, and the quality of life of its residents and community.

Seriously suffering are the Regents Canal, open space and the environment (<u>'environment</u>' does not even get one mention in the SPD).

The enclosure of the Regents Canal by the Ted Baker development proposal promoted by LB Camden (2017 Planning Meeting Podcast Ref: 2hr57min) which has not so far got formal consent, would be yet another gross over development that would add to the woes and enclosure of the canal after 200 years.

However, the beleaguered Ted Baker Co have sold their building and are renting back the offices, so it appears that the construction

work of the old Post Office site may not get started for a very long time.



## The environment and the Regents Canal

In the introduction to this unwelcome SPD document it says that "... neighbourhoods are seeing significant changes", which is a disturbing prophesy from LB Camden. However, one thing that <u>has not changed for centuries</u> and must be protected, is the open space and charm of the Regents Canal in its Bicentenary Year.

It should be prominently publicised that there are firm policies and requirement to protect and enhance open space, rather than it being sidelined for instance by LB Camden who seem to prefer large and ugly glass-and-concrete blocks rather than environmental locations.

An important and relevant policy published by the Mayor of London is the 'All London Green Grid' (ALGG) Supplementary Planning Guidance to support the implementation of the Green Infrastructure and Open Space policies of the Mayor's established London Plan, and his new Draft London Plan.

## Important landscape corridor

The Mayor's ALGG identifies two strategically important landscape corridors that are partly in the Camden area - the <u>Regent's Canal Link</u> and the Nash Ramblas Link. So how could it be right for LB Camden to allow and promote the enclosure of an "important landscape corridor" such as the Regents Canal in the case of 101 to 103 Camley Street developments? The question must also be asked of the case of the potential Ted Baker development with its overbearing wall of buildings along the edge of the canal. And there are more examples to come with the canalside over-development recommendations in Camden's draft SPD for the Regents Canal in the Camden Town area.

It is important to note that whilst referring to the importance of open space, the Mayor's SPG points out that 'open space is a non-renewable resource'. Quite right, and we have already lost too much open space.

# Open space deficiencies

It should be noted by LB Camden that in Para 3.9 of the 'All London Green Grid' SPG it says:

The ALGG also provides the strategic framework for planning, managing and improving . . . the provision of green space across London and addressing deficiencies. London Plan policies 2.18 and 7.18 require boroughs to address deficiencies, inequality, quantity and accessibility and recommend that boroughs prepare open space strategies for this purpose.

How many times over recent years has LB Camden failed to develop open space policies in the Camden Town area and actively promote them – deliberately?

### Local plans disregarded?

It should also be prominently noted that Para 3 in the Mayor's ALGG provides that the "*The concept of the ALGG should be embedded in Neighbourhood Plans, Local Development Plans*..." which means that Camden's Local Plan and policies should be in conformity with the ALGG, as well as the London Plan.

But of course they are! But of course LB Camden ignores them. For instance Policy A2 'Open Space' in the Camden Local Plan clearly states that:

In order to protect the Council's open spaces, we will conserve and enhance the heritage value of designated open spaces and other elements of open space which make a significant contribution to the character and appearance of conservation areas or to the settings of heritage assets.

This is the sort of recommendation and proposal that is expected of a reliable borough that has the responsibility for important open spaces and heritage assets such as the Regents Canal.

In fact Camden has <u>no</u> Planning Policies or Guidance that in any way counter or oppose the importance, requirement and protection of open space provision.

So where has LB Camden and its planning department gone astray?

This is certainly shown up in Camden's admin and planning with the troublesome 'Canalside and Camley Street' SPD which does not have any provision to mitigate the negative effect on the open space character of huge edifices looming over the Regents Canal such as the 101-103 Camley Street buildings (*right*).



## Camden's anti-policy programme

A very important set of planning policies that LB Camden ignores is the care and management of London's waterways, canals and water spaces entitled the <u>Blue Ribbon Network</u> (BRN), dealt with in detail by the Mayor's London Plan in Chapter Seven, and referred to in numerous open space, green environment and heritage sections of the London Plan (2016), and with extensive coverage in the Daft London Plan 2020.

LB Camden does not even mention the term 'Blue Ribbon Network', nor its policies and <u>requirements</u>, in their misguided and draft 'Canalside to Camley Street' SPD!

Camden's reference to the Regents Canal in the SPD is generally to identify the location of a gross building development encroaching into the canal corridor, rather than consideration of the sensitivities and requirements of the Regents Canal in its Bicentenary Year. It appears that LB Camden and their 'planning' department are in denial that the Regents Canal is of strategic importance to London as detailed in the London Plan's Paragraph 7.70 and Policy 7.24.

It is very difficult to imagine that Camden Council has ever heard of the Mayor's requirement that "the starting point for consideration of development and use of the Blue Ribbon Network <u>and land alongside it</u> must be the water" (LP Policy 7.24, Para 7.71), (emphasis added). Or is LB Camden just totally ignoring it!

### Heritage - not to be

A question that the Council <u>may</u> have asked themselves is 'how and why does the heritage of the Regents Canal influence the developments along the canal corridor in the borough?' Unfortunately they seem to have come up with the wrong answer – again.

They only needed to have looked at their Camden Local Plan (2017) to have read (and hopefully taken in) that "The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas ... Conservation areas are designated heritage assets ... In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies ..." (Policy D2). (emphasis added)

Of course, the Regents Canal in its Bicentenary Year is very well up in the heritage stakes – a man-made nine-mile construction that has carried London forward over the centuries, and connected the capital with the rest of the country for all that time. The structure is sound, and the waterway is in good working order. What an asset to the borough, but what a way for Camden to treat it by enclosing its open character and plunging it in shadow, and degrading the public use and pleasure of <u>their</u> canal and its transport potential.

Note: The canals of this country are designated as a 'public asset', quite literally, as the canals are held by Government for the nation in perpetuity (Transfer of Functions Order 2012).

So the Regents Canal belongs to the people, all of us, and especially the Camden residents with their section of the canal that is targeted by developers, and their misguided Council in this SPD. The residents of the borough are well within their rights to tell Camden Council to leave-off degrading and sidelining their Regents Canal by heavily promoting massive out-of-scale buildings along the canal.

## Who benefits?

Of course everything that Camden Council does must be for public benefit and the good of the borough's residents, and their long term future. But, the question must be asked of Camden in relation to these massive developments that they feature and favour in the SPD – "who do they mainly benefit?"

It cannot be denied that loss of the open space value of the Regents Canal, the degrading of conservation areas and the environment, and with neglect of a 200 year old national heritage asset, <u>is a loss too far</u>. The local residents do not seem to necessarily benefit a great deal with Camden's imposed 'progress' – with their locality now looking totally different, and with Camden Town skyline disappearing.

On the other hand, property developers with their backers and investors (quite likely off-shore), benefit from huge profits with waterside developments that provide a considerable financial uplift. There has been a frenzy of property development along London's canals and the Thames for instance.

### Take but give nothing back

Property development along London's waterways in recent time has seen massive profits for developers and investors, but what do they give back to the waterways and the environment? Nothing, not a penny!

#### For the few – not the many!

Commerce, trade and finance is not a bad thing of course, and needless to say business and industry is strongly supported and welcomed. But NOT at the expense of the community, and the quality of life.

With the promotion of this 'Canalside to Camley Street' SPD, Camden Council and the Planning Department are drawing too close to the circle of developers and investors (<u>the few</u>), and are distracted from providing adequate community development, and are not providing a long term reliable and worthwhile future for Camden Town and the locality, and the all-important residents (<u>the many</u>).



#### A Kings Cross viewpoint

A major failure of the 'Canalside to Camley Street' SPD document is its starting point!

The first part of the document features Kings Cross Central of course, and is all about the British Library, Med City, the Knowledge Quarter on Euston Road, proximity to Camden Market (!) and even Regents Park for some reason. It includes anything other than the Regents Canal, the local low level developments and the characteristic brick terraces of Camden Town, which are the target of the development.

Setting the scene in the first sections of this place-<u>changing</u> document is made by LB Camden from a Kings Cross viewpoint and from the Euston Road, to deliberately create the sense of place of Croydon rather than Camden Town, and a focus on an overdeveloped, high rise and alien north London scene.

### The end of Camden Town as we know it?

This unsympathetic SPD is directed towards an uncertain future, and it looks like the heart of Camden Town is at significant risk from wholesale upheaval and too much concrete. Any long term vision is not very evident in this SPD, if any vision can be detected at all.

What will the future hold? A reliable local authority and planning department would not be heaping problems on to the next generations with their short term biased and weakly thought-out proposals.



The long-term future is achieved by planning, and not by uncontrolled and exploitative 'development' that serves the few rather than benefitting the many.

#### Camden Council has lost the key

The key of course is 'planning policy' that should direct the way to achieve long term requirements of the businesses and residents of this area, and in tune with Camden Town and the Regents Canal for instance, and not the wish list of outside (or off-shore) speculators who are more interested in building big and bulky.

The Council and its planners have shown (see page 2 above etc) that they are not very observant of policy, which sadly includes them skirting around their own Local Plan!

#### The National Planning Policy Framework

Perhaps it is time to mention some more policies that have been sidelined, and these are from the Government's NPPF, in case LB Camden and their planners have not got the message. A relevant paragraph of the emerging NPPF (2019) says for instance:

In determining applications, local planning authorities should . . . describe the significance of any heritage assets affected, including any contribution made by their setting (Para 189).

That of course includes the Regents Canal (and its canal corridor setting) which is a <u>national</u> heritage asset, and does Camden Council realise the huge responsibility for caring for part of a national resource?

The government's planning framework takes a very positive view of the economic importance that heritage assets could have, and in this SPD more attention should be given to the commercial and economic importance of the Regents Canal, rather than only considering it as a sideline to property development. The 'conserving and enhancing the historic environment' chapter of the NPPF states:

In determining applications, local planning authorities should take account of . . . the positive contribution that conservation and heritage assets can make to sustainable communities including their economic vitality (Para 192 b).

'Economic vitality' is a very apt phrase for the Regents Canal which has a great commercial transport use, as well as being an active facility for recreation and ecology.

### Camden's future and the Regents Canal

With the revival of water transport, the Regents Canal could have an important future role in the borough's economy as a transport link, as well as a welcome relief for the traffic problems Londonwide and in Camden.

Don't dismiss a 100 miles of water highway in gridlocked London, because London's canal network is waiting for Camden and the rest of London to wake up, so that it can again serve London's transport needs.



The Regents Canal was built from Paddington to the Thames (with the new 100 ton standard) in the countryside around north London, at a cost of over  $\pounds$  million, and opened on 1st August 1820. This was before the railways were even thought of.

In its first year it transported over 120,000 tons, and with its direct connection to the industries in the North, trade rapidly increased and Pickfords barges served London's needs with a wide variety of goods.

In future decades the Regents Canal could be part of the transport revolution in London, with a bright new fleet of electric delivery barges. And, quietly busy in the SPD area, Bangor Wharf should play a pivotal role in goods and parcel transfer.

### Camden Planning has lost its way!

The 'Canalside to Camley Street' SPD document is not enlightened, and although there are a lot of words, the content is weak and so vague, and gives no details of how (*or why*) any development will be achieved.

Under these circumstances, it is novel that there is a section in the SPD with the unlikely title 'Vision' that contains little or no information about the future of the SPD area, with photos of other places such as the Camden Town Collective, a tower block in Kings Cross Central, and the Regents Canal towards Regents Park. What has this to do with the SPD and the community in the vicinity, let alone any vision?

### A Camden recovery?

It feels like we have the wrong sort of planning department and council in Camden, and perhaps lacking in leadership. The first thing that the borough 'management' should do is to engage more closely with the public and residents, and get out and about to collect views and information. That is a more realistic and fair interpretation of 'consultation'.

Camden Council need not stand still, and it can evolve and unfold mature development proposals in response to changing times, but not to uproot and dispose of neighbourhoods, and change them out of all recognition.

#### <u>Summary</u> See the illustration below.

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