

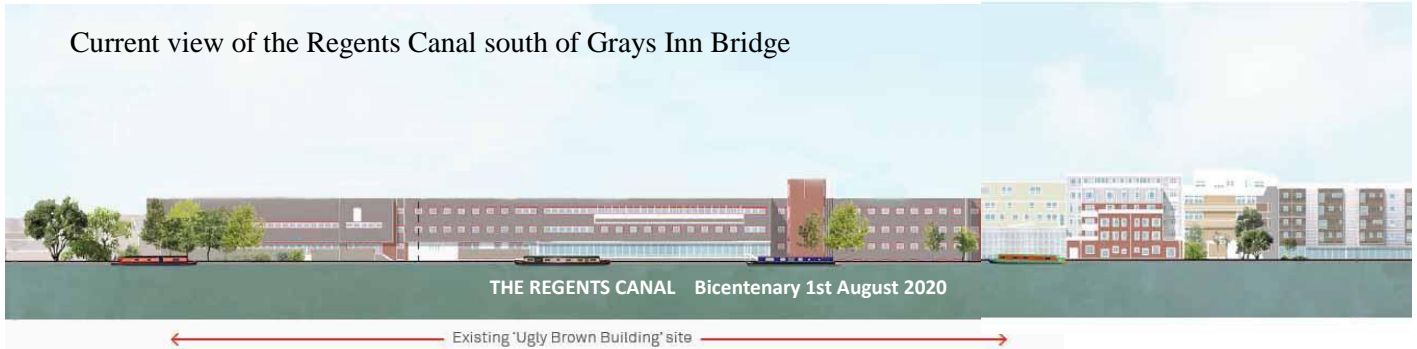
THE REGENTS NETWORK

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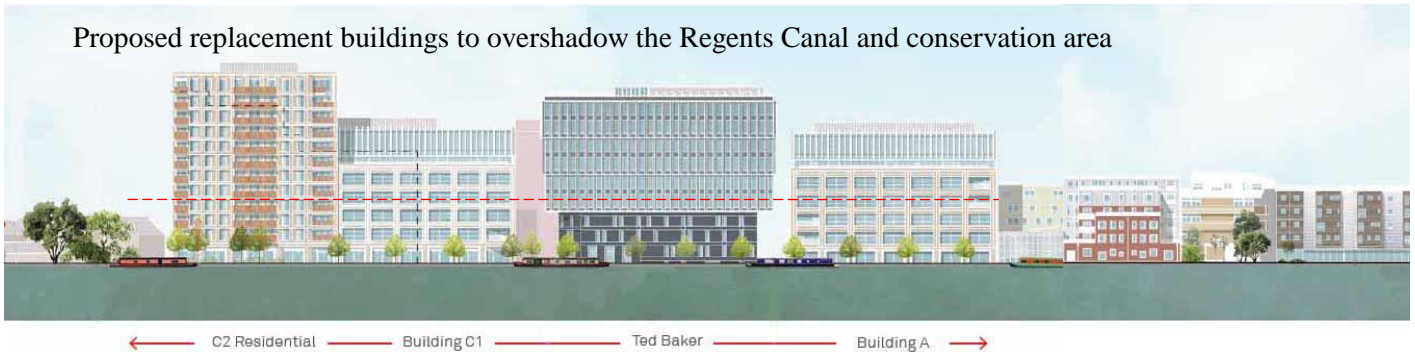
**A WATERWAYS RESPONSE TO  
OVERDEVELOPMENT OF 2-6 ST PANCRAS WAY NW1  
BESIDE THE REGENTS CANAL**

LB Camden Revised Planning Application Ref: 2017/5497/P - OBJECTION

Current view of the Regents Canal south of Grays Inn Bridge



Proposed replacement buildings to overshadow the Regents Canal and conservation area



1.1 It cannot be pretended that the proposed development will not negatively affect the Regents Canal. Just look at the size of the buildings that will run along the bank of the canal and the conservation area. The current Post Office brown building on the site may be ugly, but it is of reasonable scale and fits in with the historic industrial character of the canal, unlike the proposed gross buildings trying to 'make a statement' of some architectural merit although they seriously overshadow the 200 year old heritage canal.

Very unfair

2.1 It would not be fair on the residents and locals, nor the visitors to Camden Town, for this wonderful stretch of open waterspace to be ruined by a bulky and solid development. Parts of the buildings are set back (slightly) which does not reduce the bulk at all.

2.2 There seems to be a larger area of windows overlooking the canal in the revised design, and which will flood the Regent's Canal and conservation area with light at night, as the applicant shows in one of their computer generated drawings.



2.3 The light pollution will also affect the residents opposite on the other side of the canal (Elm Village), and the huge buildings will be glaring at them day and night.

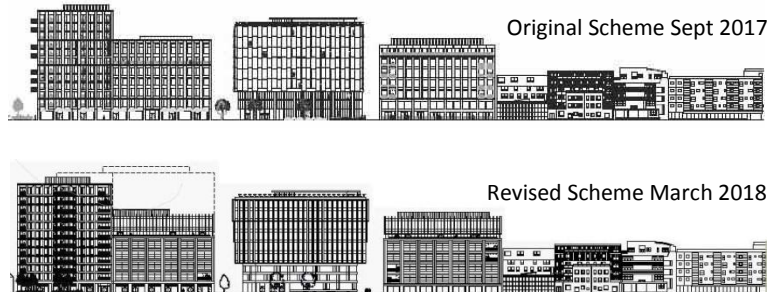
### Residents and community ignored?

3.1 Many people may be mystified by the applicant’s comment about what are called ‘Key Changes’ in the revised design, in a statement that “the canalside elevation and massing has been considerably revised in response to comments” (D&A Statement Addendum, March 2018).

3.2 Somehow, this misleading statement does not mention anything about the huge, overbearing bulk of the proposed buildings which is one of the main objections from the community and residents, and that the Camden Journal headline stated that the development “would ruin the canal”.

### Spot the Difference

4.1 It is very difficult to agree with the applicants that the “massing has been considerably revised”. It appears that it is only the architectural details that have been changed. The buildings appear to be of very similar bulk and height as the previous application.



4.2 This makes the Statement of Community Involvement sound a bit hollow, and although the applicants may have gone through the ‘consultation routine’ with the residents, the community and a number of other authorities and stakeholders, it looks very much like the applicants have been selective in their consideration and respect for the responses.

### Obfuscation and excuses?

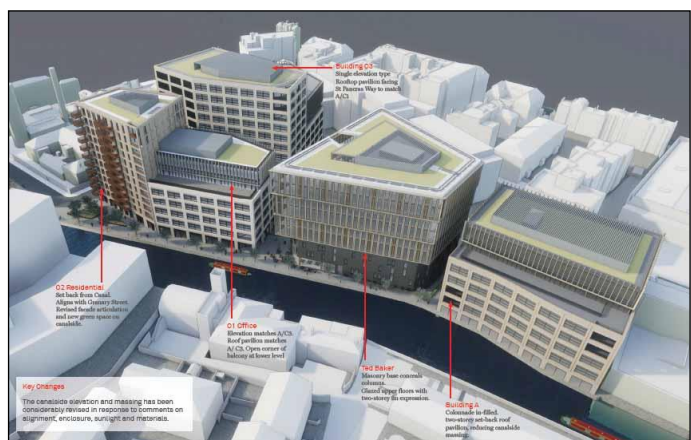
5.1 The indirect response from the applicants to the consultation was left to the planning consultants in their Appendix 1 Table, who replied with referral to planning documents (without any page or line reference) rather than a direct answer or explanation. Of course, the planning documents did not directly provide the answers, and so potential criticism was sidestepped.

5.2 In general the comments and assurances from the applicants and their planning team were mainly in the form of excuses, and were selective and non-committal to gloss over any concerns about the development. But, this may have raised more questions than it answered, including why ‘transformation of an ugly building’ was used as an excuse to overdevelop such a sensitive site.

5.3 Overall the applicants and their team attempted to smooth-talk their way through the planning and heritage issues in order to exploit the wonderful location beside the Regents Canal without taking the part of the canal itself which may not welcome such a development along its banks. In the usual manner the developers ‘take’ from the waterways and give nothing back.

### Out of place

6.1 It is revealing to note how out-of-place the development is in the characteristic low level housing and buildings of Camden Town that surround the development in the photo (right) of the applicant’s model. It looks like something parachuted in from Croydon, where it should remain as it does not fit in Camden Town.



6.2 The applicant’s documentation describes (at length) the improvements in the architectural details and appearance, as if that is the key to justification for the scale and bulk of the development that is undeniable. The architecture may be improved, but unfortunately the general appearance is not the problem that needs to be solved with the development. It is the bulk and height of the building closing in on the Regents Canal and the open space which is the main problem. It is hoped that the diversionary tactics do not fool anyone.

### Forewarned

7.1 It should be noted that the applicants were well aware of the sensitivities of the Regents Canal and the conservation area, and in particular the limitations on the scale of building for their site, as they were informed by Regents Network (and others) at very early face-to-face meetings that there are height and bulk considerations and restrictions because of the importance of the waterway.

7.2 The applicants were made fully aware of the limitations of the site, and their consultants and architects cannot be said to be unaware of planning policies in the Local Plan and the London Plan, and the guidelines in the NPPF and other statutory legislation. So the question to be asked of them is why they decided and agreed to proceed with their development when it does not comply.

### Copycat buildings

8.1 Another excuse used to attempt to justify the excessive height and bulk of the development is that there are tall buildings along the canal to the south. However, it is seriously regretted that the two buildings (101 and 103 Camley Street) were ever given planning consent by LB Camden in spite of the fact that they have a serious negative effect on the Regents Canal and the conservation area, and on the heritage of the canal.

8.2 One of the excuses to justify these two oversized buildings was the proximity to the Kings Cross Opportunity Area. However, they are not in the Opportunity Area, and what is known as the ‘opportunity creep’ is strongly opposed. They should never have been given consent, and the residents and community of Camden (as well as the Regents Canal) were badly let down by their borough. With a bit of determination the two developments could have been reduced a certain amount and re-structured to provide a perfectly satisfactory result for everyone.

### No comparison

9.1 The Post Office development cannot be permitted to stretch the ‘opportunity creep’ so much further along the Regents Canal and more remotely from the Kings Cross development.

9.2 Nor can the developers and consultants for the Post Office development claim that the neighbouring oversized buildings create a precedence. It is confirmed that ‘precedence’ is not a planning consideration, and the term cannot be found in any planning documentation whatever.

9.3 Every application has to be determined on its merits (or shortcomings) and through the approved planning processes, rather than relying on excuses, hopes and ambition.

9.4 In any event, precedence works both ways, *viz.*: there are tall buildings so we can have more; or alternatively we have tall buildings so we have quite enough and do not want any more!

### Policy rather than presumption

10.1 Regardless of the applicant’s interpretation of the consultation, and their patronising attitude towards any intervention or disapproval from their detractors (*see above*), surely there can be no such disparity with planning policies and guidelines.

10.2 However, not much is heard from the applicants about policy, as the majority of their comments and ‘justifications’ are interpretations of their expanded wish list. The applicants cannot be selective over whether policies or guidelines are conformed to.

### A leading policy on open space

11.1 One key policy for assessment of this PO application is in the London Plan which states that London’s Blue Ribbon Network (which includes the Regents Canal, of course) is defined as open space (LP BRN Policy 2.18, Para 2.86), and consequently this means *the waterways have the same consideration and protection as a park*, and are included in the ‘public open space categorisation’ as a linear open space (LP Table 7.2).

11.2 The question that must now be asked is ‘would this PO development be permitted to be built along the edge of a park?’, to which the resounding response would be ‘No!’ The applicant for this development would not attempt to build such huge bulky buildings beside a park of course, so why

has this PO planning application been submitted by the applicant for such gross buildings to be built alongside the Regents Canal in Camden Town that will so plainly enclose the valuable open space of the waterway? It could not be that they are hoping that the Camden planners will let their application through in the face of such a ‘cut and dried’ policy.

11.3 Another London Plan policy follows on, that states “development proposals should restore and enhance the Blue Ribbon Network by protecting the open character of the Blue Ribbon Network” (LP BRN Policy 7.28, Para Af). The PO developers need to think again, as a huge wall of multi-storey buildings running along the bank of the Regents Canal cannot be said to be doing anything positive for the canal, let alone protecting it.

### The Regents Canal in Camden is a Heritage Asset

12.1 It needs to be made clear to the PO applicants and other waterside developers that the Regents Canal in Camden itself is a significant man-made heritage asset. This makes it sound important, which of course it is, being but a short section of a 3,000 mile national network.

#### A public asset

13.1 It is not generally realised that our canals including the Regents Canal are officially designated as a public asset. Parliament has designated the nation’s canals as a public asset (Transfer of Functions Order 2012), and the canals are held for the nation in perpetuity. It is also not generally recognised that all of us own the canals.

13.2 This clearly identifies the canals as a particular entity, and being specifically defined\* enables the Regent’s Canal to be recognised as a heritage asset in the Borough of Camden.

13.3 The Regents Canal is still a heritage asset even though not officially identified by the borough, as the current NPPF definition of a heritage asset states that it is –

“a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing) (Draft NPPF 2018, Annex 2).

13.4 LB Camden could register the Regents Canal as a heritage asset, but it is not necessary. However, the borough should realise that it has a big responsibility for the care and protection of a section of a national asset. It is as big a responsibility as that.

13.5 It is also noted that the NPPF states that:

“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. (NPPF 2012, Para 129).

13.6 It is worth emphasising that our canals are man-made structures just as buildings are, and it is incredible that the thousands of miles of canals around the country were dug by hand. They were well built a couple of centuries ago and are still in working order and in daily use.\*\*

#### Summary

Although there is no objection to appropriate property development alongside the canal network, this proposed development with its strong negative effect of the height and bulk is seriously detrimental to the Regents Canal and its environmental and open space attributes.

None of the excuses and justifications from the applicants and their consultants will reduce the potential harm and degradation of one of Camden’s important heritage assets. It is recommended that this planning application is rejected.

\* **Definition** The curtilage of the Regents Canal is defined by its cross section construction, and is described in broad terms as “from the rear of the towpath to the bank opposite, or the rear of the wall(s) on the off-side”. Note: this can include walls of buildings constructed on the off-side of the canal.

\*\* The Regents Canal was constructed around the outskirts of London, when Camden Town was a few houses and a pub at a crossroads, and Chalk Farm was a farm, and it pre-dates most other heritage and historical items and listed buildings along its 9½ mile route. It was built for the sum of £772,000 and opened on 1st August 1820, and was successfully busy from the outset. In its first year it carried 120,000 tons of goods. In a couple of years from now the Regent’s Canal will be celebrating its bi-centenary, and it is still in everyday use. What an asset!

## **APPENDIX 1**

### **POLICY EXTRACTS:**

#### **Current NPPF 2012**

129. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.

131. In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality;

137. Local planning authorities should look for opportunities for new development within . . . the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably. (Underlining added)

#### **Draft Consultation NPPF March 2018**

193. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

### **Annex 2 – Glossary:**

**Heritage asset:** A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

**Open space:** All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

## APPENDIX 2

London's canals have fallen out of use over the past decade, but  
**WATER TRANSPORT IS MAKING A COMEBACK**  
 A pilot project will relieve congestion in the West London industrial areas

**• LONDON'S WATER FREIGHT INDUSTRY •**

### COLLECTIONS AND DELIVERIES BY CANAL

**'BARGING AROUND LONDON'**

*Daily and weekly delivery and collection service at the canalside near you*

**Your local water freight service**

The map illustrates the network of water freight routes in London. Key features include:
 

- LINK TO A40/M40:** Routes connecting Slough, Heathrow, and the M40/M40 area.
- LINK TO A40/M40:** Routes connecting Greenford, Park Royal, and the A40/M40 area.
- LINK TO A40:** Routes connecting Park Royal, Old Oak, and the A40 area.
- LINK TO M4 AND HEATHROW:** Routes connecting West Drayton and Heathrow.
- LINK TO A12/A13 & Blackwall Tunnel:** Routes connecting Bow Locks and the Blackwall Tunnel.

 The map also shows major basins like PADDINGTON BASIN and LIMEHOUSE BASIN, and various interchanges such as NORTH CIRCULAR INTERCHANGE and BRIMS DOWN AND M25.

### PARK ROYAL TIMETABLE \*

*PALLETS, SMALL CONTAINERS, PODS, ROLL CAGES, TROLLEYS, CRATES, PARCELS*

<b>Hayes</b>	<b>Greenford</b>	<b>N Circular</b>	<b>Park Royal</b>	<b>Old Oak</b>	<b>A40 Link</b>	<b>Paddington</b>
Bulls Bridge	Lyons Dock	Brent Wharf	Northfields	Powerday	Kensal Green	Stone Wharf

**• THE PADDINGTON ARM RUN •**

TWO BOATS TRAVEL IN EACH DIRECTION EVERY DAY ALONG THE PADDINGTON ARM WITH A REGULAR SERVICE

Leave each end at 0830 hrs and 1400 hrs

Estimated arrival times at the canalside near you - by App

**North Circular Depot**

Brent Wharf

**• THE NORTH CIRCULAR SHUTTLE •**

Last mile delivery and despatch at various locations via the main road-linked depot - by arrangement and as required

**Park Royal Freight**

A canalside near you

**• LOCAL FREIGHT PRIORITY •**

Pallets, small containers, pods, roll cages, trolleys, crates, parcels from here to there by robot transport on an electric zero emissions barge

**LONDON'S KITCHEN DELIVERIES**

Famous products transported environmentally and on time for London to be well fed

**BEER BARGE**

Deliveries to a popular canalside pub or bar near you from a range of micro breweries and bottlers

**SUPPLIES AND RAW MATERIALS**

Goods and supplies for your business and manufacturing brought quietly and calmly to a local drop-off point

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