

Draft New London Plan Consultation,

## Comments from the Camden Civic Society

The Camden Civic Society, charity registration 276262, was founded in 1963. We cover the whole of the London Borough of Camden but much of our more detailed work has in recent years been taken over by the large number of Conservation Area Advisory Committees which now exist within our Borough. During the last five years, much of our time has been taken up with campaigning on HS2, and related transport and environmental matters.

Two other aspects of London planning which concern us very much are tall buildings, both commercial and residential, and the identification of residential areas north of Euston road as suitable for commercial development of a type so far characteristic of Central London.

We support the detailed comments of the Camden CAACs, the Somers Town Community Forum, the London Forum of Civic and Amenity Societies. We also support the policies of the Skyline Campaign.

We formally request to make representations at the Examination of the draft Plan under the following headings:

HS2 and redevelopment of Euston station (Policy xxx);

the broader question of the identification of transport hubs as suited to higher and denser buildings  
the loss of green spaces and trees which, as exemplified by Euston, development around transport hubs brings with it.

### ***The Mayor's vital role in Planning and the problem of tall buildings.***

In many respects we welcome the draft New London Plan and are glad of its broader approach, particularly the attention it gives to spatial planning. But our experience leads us to believe that horrors will nevertheless still be perpetrated at a local level unless the Mayor is willing to take a more active part in preventing them.

When we came to City Hall on 21<sup>st</sup> February 2018 as part of our campaign against the unnecessary felling of trees by HS2 Ltd, the photograph below was taken.

In the photograph (by Jane Gull), the Walkie Talkie building dominates the view from City Hall in the most obnoxious way. This was approved in 2006 at the time Ken Livingstone was Mayor is a building about which Londoners can only feel deep shame

<https://www.theguardian.com/politics/2008/feb/18/london08.london1>).

Boris Johnson when Mayor was similarly over-permissive of tall buildings. These constructions obtrude into views from very many places and, close to, block out light and create wind tunnels. Overall, they add greatly to the stress of living in London. This is particularly true of residential towers where residents in older more traditional housing at their base have the feeling of being continuously watched over. We concur with the opinion of the Skyline Campaign that private residential towers are the 'slums of the future'. This is because it will be almost impossible to get long-leaseholders to pay for the very expensive maintenance they will require in the future: it will

not be possible to clear them out of tenants to allow refurbishment, as can be done with office blocks.

We are still hoping that our present Mayor, Sadiq Khan, will recognise the need to protect Londoners from them.



**In Camden** we were particularly disappointed that Sadiq Khan did not 'call in' Camden's own application for a tower of private luxury flats in Brill Place, to be built on a public park and tall enough to cut across views of Grade 1 St Pancras station and obtrude into many longer vistas, including from Regent's Park.

### ***Patterns of change and the difficulty of predicting the needs of London over the next eight years***

Since 2011, when the current London Plan was published, London and Londoners have seen very great change: a rapid rise in population has led to noticeably larger quantities of people on pavements, on public transport, in parks etc. in addition to an acute shortage of social and affordable housing, medical facilities and schools. Over the same period there have also been many large private building projects, particularly of office blocks, student accommodation and major housing developments (all of these three categories very often in the form of towers).

It is fair to say that the rate of change has been bewildering and stressful for many people and we believe that the majority of Londoners, were they asked, would be in favour of a period of calm and consolidation over the 8-year period for which this new London Plan will apply.

But this draft replacement document predicts and in many ways encourages more of what we have already been experiencing over recent years: even if the intention is to keep development within existing geographic limits (we very much support the protection for Green Belt and Metropolitan

Open Land, policy xxx), the draft envisages a city where ‘growth’ of both population and economic activity is continuous.

From our viewpoint, and writing no doubt several months since the draft was put together, the certainty of growth is much less. In particular, Brexit is bound to make the forthcoming period very different to that we have just experienced; we believe it will inevitably cause some cooling of the London economy, if only in the short term. We get the impression that there is already a surplus of office space.

To take the example of transport, there has already been an unexpected drop in the number of people using public transport. Increasingly acute shortfalls in state funding are also having their effect and, as we see it, the Government is now unlikely to support Crossrail 2. Further, as stated in our letter of 21<sup>st</sup> January to the Mayor, we have good reasons to think that the HS2 project will be halted altogether or at least terminated at Old Oak Common rather than Euston (please also see our comments at Paragraph xx below).

A local plan within Camden which has contributed to the drafting of this new London Plan, the Euston Area Plan, in our view depends incautiously on the arrival of HS2 in Camden.

### ***Is further growth needed?***

We recognise that, as set out in the introduction to the present plan, at 0.4, the GLA Act requires that the Plan makes provision for ‘economic growth and wealth creation’.

But it is increasingly recognised that sustainability is a more important aim for the future than growth or ‘development’. As far as London is concerned, there appears to be here a very high level of economic activity and of wealth already. What is required is that these should be better distributed among London’s population.

While we agree that ‘growth’ can be desirable at a local level, we are concerned that the statement by the Mayor at the start of the draft, at p.xiii. In our opinion, ‘sustainable growth’ is something which is contradictory. (*‘This new London Plan marks a break with previous London Plans, represents a step-change in our approach and serves as a blueprint for the future development and sustainable, inclusive growth of our city.’*)

### ***Please do not use the term ‘regeneration’ as something positive***

A term which seems to embody the idea of growth and about which we have grown increasingly suspicious is ‘regeneration’, as at the Policy H10 *‘Redevelopment of existing housing and estate Regeneration’*. ‘Regeneration’ is a term insulting to the residents of the area in question and of their housing, suggesting that they and their homes are inadequate and in need of radical change. As with the apparently now-abandoned Haringey Tottenham scheme, very often what is proposed is something that will be worse for the residents already on the site – forced eviction from their current homes and transfer to new but smaller and less well-designed space, crammed huddles with old land new neighbours, at the cost also of gardens and trees.

‘Investment programme’ would be a better and less injurious term and aim.

In Camden, we have learnt to become highly suspicious of ‘regeneration’ in particular because this is what HS2 Ltd are offering us in place of many years of disruption while the scheme and station are constructed. In fact, it is clear to Camden residents that HS2 is something wholly without gain as far as the local population is concerned, and is being imposed upon us without our agreement.

The existing housing around Euston is well planned and perfectly acceptable to residents so long as it is well-maintained. There is deprivation, but this has social and health causes which cannot be cured by radical rebuilding schemes. In fact, we cannot identify any council estates within LB Camden where the fabric is fundamentally inadequate – repair and maintenance is much less socially disruptive and less wasteful of resources.

Camden's Regent's Park Estate has already suffered unwelcome 'intensification' since, with money given to them by the Government, Camden has built there already the homes intended to be replacements for blocks due to be demolished for HS2 Ltd. These new blocks have been built on green spaces, a permanent loss to the area in addition to the much greater losses of green space associated with the railway scheme itself (in particular St James's Gardens).

### ***Intensification in housing.***

We recognise the urgent need for more housing units, particular social housing. But we are aware that traditional London terrace housing, which characterises southern and mid-Camden, already provides the potential for good density if still used as or reverted to housing. We also believe that council estates within Camden, given the much larger size of the individual buildings here, including a relatively large number of 'tower blocks', already provide a good dense ratio of floorspace to open space.

But the term 'intensification' is equivocal in our view, and likely to become debased, as we believe 'regeneration' already has. We agree that there is much scope for new housing for example above retail sites, or sites with a commercial or service function no longer needed. Redundant low-rise buildings along main roads, for example, shops and petrol stations set back along major roads, are appropriate for additional housing (we make this point in the expectation that motor traffic is due in the near future to become dramatically less polluting than at present).

But we are worried about intensification within areas already long devoted to housing. Camden has large areas of suburb-type development in the north and west of the borough. These could be considered to be covered by Policy 2.03: where it is said that *'the suburban pattern of development has significant potential for appropriate intensification overtime, particularly for additional housing'*

At a recent meeting of the London Forum of Civic and Amenity Societies, societies from outer London expressed their view that this clause represents 'a declaration of war' on the suburbs. We wish to express our solidarity with them, and urge the recognition that the London suburbs are as characteristic of London as the inner city terraces, and greatly contribute to London being such a pleasant city to live in. We would be very sorry to see very green areas built over in the expectation of a continued rapid rise in population which may in fact already be very much slowing down.

We would like that the contribution of well-established large gardens and mature trees to species diversity and air quality properly valued, even where these gardens are private.

### **Town centres and transport hubs.**

We welcome the recognition of the role of town centres in Policy GG1 Building strong and inclusive communities but are worried that they too are considered appropriate for 'regeneration' (at 2.07).

But we object to the identification of Camden Town as a Metropolitan Town Centre (as in Figure xxx), While not understanding quite what this is intended to mean, we think that it seems to have something to do with its transport connections.

That major transport infrastructure terminates or passes through a particular place, especially if underground, as the Northern Line is at Camden Town, should not justify turning this local centre into some kind of flagship focal point; it should remain appropriate to the local hinterland it serves. We made this point in our successful objections to a proposal made by TfL at the time of Kin Livingstone's mayoralty, that Camden Town Underground Station should be marked by a tall building. Camden Town is not beautiful, but it is functional and successfully retains a human scale. Views up to the wood at Kenwood along the High Street are a reminder that it leads out of London and is not part of the centre.

We have no objection to the Ultra Low Emission Zone being extended to cover Camden Town. But up to now the ULAZ has been particularly associated with the Central Activity Zone and we are certain that Camden Town should not be included in the CAZ.

Much the same point can be made about economic development and higher buildings in relation to transport hubs which are not part of Town Centres.

The London Borough of Camden has particularly good transport connections and contains three London termini - Euston, St Pancras and King's Cross, as well as railway stations on the local Overground, and reasonably Underground and good bus connections.

If this transport infrastructure was taken as an excuse for development, intensification and higher buildings (as for example at 4.2.5), most of the middle part of Camden (based on Camden Town, Kentish Town, Chalk Farm and Primrose Hill, still very largely residential although close to central London, would be changed beyond recognition and turned into a kind of Central-London-lite.

The use of PTAL values for assessing where development and intensification should take place is very dubious in areas such as ours, and ignores the established character of areas which by chance happen to be near transport hubs.

### **Euston – we remain very worried**

The huge development at Euston envisaged in the press release issued by the DfT in connection with the appointment of Lendlease as the Master Development Partner at Euston in our view are completely unacceptable and to us appear to be the result of some kind of a hoax: that there is railway land at Euston available for development like the railway land at King's Cross St Pancras. Partly because of Euston's peculiar history, where the engines were not originally attached until north of Regent's Canal, and all the goods yards etc were in this area (as in the remaining Round House at Chalk Farm), the railway land at Euston has always been minimal – we have made this point repeatedly, especially in our three petitions to Parliament.

The existing London Plan has an indicative employment capacity of 7,700 and supports a minimum 2,800 new homes.

The Euston Area Plan aims to deliver overall between 7,700 and 14,100 jobs and between 2,800 and approximately 3,800 additional homes.

The draft London Plan aims to deliver 16,500 jobs and 2,800–3,800 new homes.

We urge that the numbers in the Euston Area Plan are not exceeded. To achieve the numbers in the current document can only mean evicting a large number of people out of current housing, and rehousing them in much more dense and much less pleasant homes, while at the same time much reducing the amount of open space and trees,

when we have already lost a large number of these in preparation for the construction of the HS2 railway itself (which we very much doubt will take place).

In particular, the phrase at 2.1.66, 'scope exists to reconfigure Euston Square Gardens' opens up the possibility for building on the Gardens, something we know Network Rail and Camden council are already planning. The wording needs to be changed to support the full reinstatement of the gardens – including green spaces and trees – which HS2 Ltd are in fact committed to.

Hero Granger-Taylor for Camden Civic Society, 2.3.18