

Eton

Conservation Area Advisory Committee

COMMENTS ON THE LONDON PLAN: THE SPATIAL DEVELOPMENT STRATEGY FOR GREATER LONDON - DRAFT FOR PUBLIC CONSULTATION, DECEMBER 2017

CHAPTER 1: GG2: Making the Best use of Land

Whilst recognising the imperative to build more housing and intensify use with high density development, we would like to see a reference to/recognition of the need for:

- High quality design
- Protection of historic assets
- Safeguarding the character and appearance of Conservation Areas.

Similarly in Policy SD1 Opportunity Areas.

CHAPTER 2: Spatial Development Patterns

It is a matter of concern that the diagrams in this chapter are so small yet so detailed that Fig 2.1; The Key Diagram and Fig 2.16: CAZ Diagram delimit opportunity areas for major commercial and residential growth extending into the Conservation Areas of Regents Park and surrounding Camden Town northwards into the lower slopes of Hampstead. It is essential that the text makes clear that boundaries of Opportunity Areas (in this case Euston and Kings Cross) and Town Centres (in this case Camden Town) are clearly defined and designated in Borough Plans to allow consultation/participation from local groups and residents.

CHAPTER 3: Design

We welcome the references made to the requirement for 'high quality development' (D1,B2); delivering 'good design' (D2), and respecting and enhancing local character and heritage assets (D1,B4). We would like to see more emphasis on these aspects in proposals for new development, extensions and alterations generally and particularly in Opportunity Areas. More recognition should also be given to the role of designated conservation areas in defining and safeguarding local character and appearance - underpinning local cohesiveness where pressure for growth is proposed and supported in the London Plan.

Policy D4: Housing quality and Standards: Para 3.4.1 A general concern raised that in identifying minimum space standards - these invariably become the 'target' thus promoting overcrowding and poor accommodation – tomorrow's slums!

Policy D8 Tall Buildings: Promoting tall buildings particularly in trying to solve the capital's housing problems is controversial bearing in mind the previous legacy of social and environmental damage. We would, therefore, raise concern about the resulting quality of environment and life for many in tall residential blocks. High densities can be achieved in housing development without the need for tall buildings and this should be the priority.

As well as often perpetuating poor quality environments, the harmful impact of tall buildings on the setting of historic assets, conservation areas and strategic and local views needs more emphasis.

CHAPTER 7: Heritage and Culture. We welcome this chapter and the recognition of the importance of heritage assets and protection of important views. Similar emphasis should be given to reviewing and updating conservation areas particularly in the context of the significant growth proposed by the Mayor/London Plan.

We propose that the local view from Haverstock Hill of the City and St Pauls (Constable's classic painting "Sir Richard Steele's Cottage, Hampstead, 1831-32", John Constable, Yale Center for British Art below) is protected, before it is threatened by tall residential and commercial buildings in the growth/ Opportunity Area around Camden Town.



CHAPTER 8: Green Infrastructure and Natural Environment. Suggest more emphasis is given to protection of trees and gardens.

One of London's most important characteristics - arguably the one that distinguishes it most of all - is that so much of its pre-World War II housing stock is made up of actual houses: houses with gardens. The London garden is a continuum, at smaller scale, of the city's very particular parks and landscaped squares. Together they make it the greenest major European city.

There is now need to prevent gardens being eaten away by extensions, garden buildings, and the concreting and paving over of outdoor areas.

Boroughs should be encouraged to recognise the importance of trees and gardens as a major contributor to ecology and the quality of the environment and amenity particularly in residential areas.

**Areas of Opportunity particularly 39/40 Kings Cross and Euston
Town Centres: Camden Town identified as ‘future potential change’ to Metropolitan Centre.**

We would raise serious concern over:

1. ***The quality of the diagrams e.g. Fig 2.16 CAZ Diagram.*** These provide a level of detail which is unclear at such a small scale and inappropriate for the London Plan. **Areas for growth or change should be identified and defined at borough/local level in consultation with local groups and community.**
2. ***The designation of Camden Town with ‘potential’ for a Metropolitan Centre.*** Camden Town is located on an already congested road and public transport north/south links into the centre of London; it is an already congested tourist and retail area particularly at its northern end (Camden Lock) surrounded by important conservation areas (e.g. Regents Park) and with significant heritage assets. This pressure for development is already having an impact on residential areas on the lower slopes of Hampstead e.g. the recently approved high rise re-development immediately next to Chalk Farm Station/applications for illuminated digital signs. Proper impact assessments need to be undertaken at Borough and local level in consultation with potentially affected local communities.

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Eton Conservation Advisory Committee