

Mr Mark McCarthy comments

Page: [Policy GG2 Making the best use of land](#)

Section: [N/A](#)

Response by Camden Town Conservation Areas to the Draft London Plan

Policy SD7 C, Fig 2.11, 2.16, and Fig A1.1:

We seek to delete naming Camden Town as a ‘metropolitan town centre’.

The Camden Town Estate was set out on land owned by the Earls of Camden between 1790 and 1870. It stretches from Brecknock Road to York Way, Kentish Town Road to St Pancras Way, Camden High Street to Crowndale Road, broadly on two axes. There was considerable coherence of architectural style, of Regency terraces, gardens and churches. During its development, the Regents Canal and the North London railway were built across, and Camden Town Station (now Camden Road Station on the Overground), at the junction of Camden Road and Royal College Street, became the central point.

The railways had a significant impact on the Estate – large goods yards were built on land of other landowners on either side. To the west, the land of Lord Southampton became were the railway yards around Chalk Farm and Hampstead Road. These were saved from the projected inner city ring road of the 1960s, and again saved by conservation to become Camden Market. To the east, the Agar estate (on land of the Prebendary of St Paul’s) became housing for working classes which were then demolished to be coal yards and now incorporated within the Kings Cross development.

Several Conservation Area lie across the Camden Town Estate in the Borough of Camden. The history, and quality of urban design, is recognised in several Historic England Grade II designations, including transport – the station and canal bridges – and much of the land is conservation area or locally listed. The later nineteenth and early twentieth century saw varied industrial development, especially many small works for the piano trade, but also larger industrial works, and diverse educational facilities.. Shops were built in Camden High Street, Camden Road and Brecknock Road. Postwar there has been some demolition of terraces and rebuilding with modernist public housing blocks – although some now regarded with less favour than the earlier terraces.

Differently from the historic Camden Town Estate, LB Camden's Local Plan designates a 'Camden Town' commercial Town Centre – from Mornington Crescent, along the High Street, around the Britannia Junction (Camden Town underground station) and along Hampstead Road to Chalk Farm (see Camden Local Plan 2017).

This has three components – the traditional shopping centre of the High Street, the tourist market within conserved buildings around Camden Lock and the railway land currently Morrison's supermarket. (Note that on LB Camden's current map of town centres, the area labelled 'Camden Town' lies over the Camden Town Estate, with the local neighbourhood shopping centre in black and North London Line / Overland station currently called 'Camden Road').

The term 'Camden Town' is therefore has several meanings. Neither the industrial area on the north of the Regent's Canal at Camden Lock, where is now the tourist market, nor the adjoining railway lands, where is now a supermarket, were the original Camden Town, although they are now adjacent to Camden Town underground station. Camden Road, central to the Camden Town Estate, has been an intersection for transport access and, as a result of the Borough of Camden's early adoption of conservation since the 1970s, the area has become attractive for small and medium-size media and professional offices. As an example, in a short row of nearby Rochester Place, NW1, are architect offices, 3-D printers, silversmith, artists studios, a former recording studio...

Character rather than transport links are the most important for Camden Town's development. Policy GG2 is at odds with needs for Camden Town

Policy GG2 proposes that "those involved in planning and development *must* prioritise the development of ... sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites."

'Must' is considered inappropriate for Camden Town – it implies absolute priority rather than relative. Camden Town Estate is 'well connected' and 'on the edge of town centres' but its status as heritage, character and community, and creative industries and professional economy are of equivalence importance to its PTAL rating. This concept is well presented in the Evidence to the Plan presented by Historic England in their Allies & Morrison report, which prioritises zones across London for their heritage and character, rather than the PTAL based on economic criteria of transporting car-less workers and consumers.

It is inequitable, and therefore contrary to the objectives of the Plan, for conservation areas further from a station, where car-use (and probably social class) is higher, should be less subject to the policy for increased density. At Camden Town, land development should be prioritised according its character, rather than because it happens also to have transport links.

Camden Town is a local, not London-wide, centre

Appendix Fig A1.5 places Camden Town as a 'metropolitan town centre' within an area for 'high' regeneration potential (20% IMD). But these two statements are insufficiently supported.

The Draft Plan should not identify Camden Town as a Metropolitan Town Centre

Policy SD7 C. states that 'the classification of International, Metropolitan and Major town centres (see Annex 1) can only be changed through the London Plan.' On the other hand, Table A1.1 in Annex 1 provides "an indication of potential future changes to the town centre network over the Plan period, including new potential centres". While 2.7.4 states "These centres are not recommended for immediate reclassification", the Draft Plan may be read as having already made a reclassification for Camden Town.

However, in London Plan 2015, Map 2.6 Camden Town is specified as a 'major' town centre, but not a Metropolitan Town Centre. And Camden's Local Plan, completed in 2017, identifies five 'Town Centres' of equal status. LB Camden has **not** proposed Camden Town as a Metropolitan Town Centre.

Camden Town does not fulfil the criteria for a Metropolitan Centre.

The Plan states that Metropolitan centres “serve wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically they contain at least 100,000 sqm of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods.” They also include “large shopping malls and town halls and civic centres”. This applies to Brent Cross, Shepherds Bush and Stratford, but not to Camden Town town centre, which is composed of three complementary retail activities – the High Street serving the local community, Camden (Lock) Market serving a tourist trade and the supermarket site (under development). (There is also a significant performance economy although, since the redevelopment of Kings Cross, Camden Town has also become an increased centre for illegal drugs, while the night-time economy with many alcohol retail points contributes to increasing inequalities in health through alcoholism and violence – contrary to the Mayor’s Public Health responsibilities, which it would be welcome for the plan to specifically identify.)

Camden Town should be a productive rather than consumer economy

The Camden Town economy should be towards production rather than consumption. Based on its heritage, and supported by the urban environment, Camden Town has a variety of sites that have potential for new use as innovative spaces and places celebrating values of the area since conservation of the 1970s. There is already an underlying framework of professional services, design companies, media companies, higher education. Camden Town is well placed to engage the international economy with high penetration through the internet, to be a hub for ideas and creativity. It should not become the show-rooms for web-order companies and the consumer economy.

LB Camden should retain planning control for Camden Town.

Under Article 7 of the Mayor of London Order (2008), the Mayor has the power to become the local planning authority for an application includes if development would have (a) a significant impact on the implementation of the London Plan (b) significant effects affects on more than one London borough. While Camden Town is centrally placed within the Borough, its transport links could be construed as ‘likely’ to affect other boroughs. We are concerned that the Mayor may use these powers for Metropolitan Town Centres, taking away local authority control.

Page: [Policy SD7 Town centre network](#)

Section: [N/A](#)

Object - Response by Camden Town Conservation Areas to the Draft London Plan

Policy SD7 C, Fig 2.11, 2.16, and Fig A1.1:

We seek to delete naming Camden Town as a ‘metropolitan town centre’.

The Camden Town Estate was set out on land owned by the Earls of Camden between 1790 and 1870. It stretches from Brecknock Road to York Way, Kentish Town Road to St Pancras Way, Camden High Street to Crowndale Road, broadly on two axes. There was considerable coherence of architectural style, of Regency terraces, gardens and churches. During its development, the Regents Canal and the North London railway were built across, and Camden Town Station (now Camden Road Station on the Overground), at the junction of Camden Road and Royal College Street, became the central point.

The railways had a significant impact on the Estate – large goods yards were built on land of other landowners on either side. To the west, the land of Lord Southampton became were the railway yards around Chalk Farm and Hampstead Road. These were saved from the projected inner city ring road of the 1960s, and again saved by conservation to become Camden Market. To the east, the Agar estate (on land of the Prebendary of St Paul’s) became housing for working classes which were then demolished to be coal yards and now incorporated within the Kings Cross development.

Several Conservation Area lie across the Camden Town Estate in the Borough of Camden. The history, and quality of urban design, is recognised in several Historic England Grade II designations, including transport – the station and canal bridges – and much of the land is conservation area or locally listed. The later nineteenth and early twentieth century saw varied industrial development, especially many small works for the piano trade, but also larger industrial works, and diverse educational facilities.. Shops were built in Camden High Street, Camden Road and Brecknock Road. Postwar there has been some demolition of terraces and rebuilding with modernist public housing blocks – although some now regarded with less favour than the earlier terraces.

Differently from the historic Camden Town Estate, LB Camden's Local Plan designates a 'Camden Town' commercial Town Centre – from Mornington Crescent, along the High Street, around the Britannia Junction (Camden Town underground station) and along Hampstead Road to Chalk Farm (see Camden Local Plan 2017).

This has three components – the traditional shopping centre of the High Street, the tourist market within conserved buildings around Camden Lock and the railway land currently Morrison's supermarket. (Note that on LB Camden's current map of town centres, the area labelled 'Camden Town' lies over the Camden Town Estate, with the local neighbourhood shopping centre in black and North London Line / Overland station currently called 'Camden Road').

The term 'Camden Town' is therefore has several meanings. Neither the industrial area on the north of the Regent's Canal at Camden Lock, where is now the tourist market, nor the adjoining railway lands, where is now a supermarket, were the original Camden Town, although they are now adjacent to Camden Town underground station. Camden Road, central to the Camden Town Estate, has been an intersection for transport access and, as a result of the Borough of Camden's early adoption of conservation since the 1970s, the area has become attractive for small and medium-size media and professional offices. As an example, in a short row of nearby Rochester Place, NW1, are architect offices, 3-D printers, silversmith, artists studios, a former recording studio...

Character rather than transport links are the most important for Camden Town's development. Policy GG2 is at odds with needs for Camden Town

Policy GG2 proposes that "those involved in planning and development *must* prioritise the development of ... sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites."

'Must' is considered inappropriate for Camden Town – it implies absolute priority rather than relative. Camden Town Estate is 'well connected' and 'on the edge of town centres' but its status as heritage, character and community, and creative industries and professional economy are of equivalence importance to its PTAL rating. This concept is well presented in the Evidence to the Plan presented by Historic England in their Allies & Morrison report, which prioritises zones across London for their heritage and character, rather than the PTAL based on economic criteria of transporting car-less workers and consumers.

It is inequitable, and therefore contrary to the objectives of the Plan, for conservation areas further from a station, where car-use (and probably social class) is higher, should be less subject to the policy for increased density. At Camden Town, land development should be prioritised according its character, rather than because it happens also to have transport links.

Camden Town is a local, not London-wide, centre

Appendix Fig A1.5 places Camden Town as a 'metropolitan town centre' within an area for 'high' regeneration potential (20% IMD). But these two statements are insufficiently supported.

The Draft Plan should not identify Camden Town as a Metropolitan Town Centre

Policy SD7 C. states that 'the classification of International, Metropolitan and Major town centres (see Annex 1) can only be changed through the London Plan.' On the other hand, Table A1.1 in Annex 1 provides "an indication of potential future changes to the town centre network over the Plan period, including new potential centres". While 2.7.4 states "These centres are not recommended for immediate reclassification", the Draft Plan may be read as having already made a reclassification for Camden Town.

However, in London Plan 2015, Map 2.6 Camden Town is specified as a 'major' town centre, but not a Metropolitan Town Centre. And Camden's Local Plan, completed in 2017, identifies five 'Town Centres' of equal status. LB Camden has **not** proposed Camden Town as a Metropolitan Town Centre.

Camden Town does not fulfil the criteria for a Metropolitan Centre.

The Plan states that Metropolitan centres “serve wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically they contain at least 100,000 sqm of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods.” They also include “large shopping malls and town halls and civic centres”. This applies to Brent Cross, Shepherds Bush and Stratford, but not to Camden Town town centre, which is composed of three complementary retail activities – the High Street serving the local community, Camden (Lock) Market serving a tourist trade and the supermarket site (under development). (There is also a significant performance economy although, since the redevelopment of Kings Cross, Camden Town has also become an increased centre for illegal drugs, while the night-time economy with many alcohol retail points contributes to increasing inequalities in health through alcoholism and violence – contrary to the Mayor’s Public Health responsibilities, which it would be welcome for the plan to specifically identify.)

Camden Town should be a productive rather than consumer economy

The Camden Town economy should be towards production rather than consumption. Based on its heritage, and supported by the urban environment, Camden Town has a variety of sites that have potential for new use as innovative spaces and places celebrating values of the area since conservation of the 1970s. There is already an underlying framework of professional services, design companies, media companies, higher education. Camden Town is well placed to engage the international economy with high penetration through the internet, to be a hub for ideas and creativity. It should not become the show-rooms for web-order companies and the consumer economy.

LB Camden should retain planning control for Camden Town.

Under Article 7 of the Mayor of London Order (2008), the Mayor has the power to become the local planning authority for an application includes if development would have (a) a significant impact on the implementation of the London Plan (b) significant effects affects on more than one London borough. While Camden Town is centrally placed within the Borough, its transport links could be construed as ‘likely’ to affect other boroughs. We are concerned that the Mayor may use these powers for Metropolitan Town Centres, taking away local authority control.

Object -

Response by Camden Town conservation areas

Policy SD10, Fig 2.19: Strategic and local regeneration

We recommend reviewing use of the Index of Multiple Deprivation as the criterion for 'strategic areas of regeneration' (2.10.1).

IMD status (of areas of Camden Town and elsewhere) is not an adequate criterion for which area should receive 'regeneration'. IMD is a proportionate rather than absolute index, and so will always have a lowest 20%. Thus, for example, it would be illogical to use IMD based on personal characteristics for decisions on rebuilding houses as part of 'regeneration': with a policy of returning the residents, the IMD would remain unchanged despite the investment. Similarly, it is illogical to define areas of social and rented housing for low-income people as areas requiring economic regeneration – since 'economic regeneration' will not necessarily change the social profile of the resident population. The Plan should seek to improve housing for according to needs, in any area of London, not just in places bounded by the IMD. The implication is important for Fig 2.19 and several previous figures, where low IMD areas are shown.

Moreover, the focus on the lowest 20% IMD for higher density building can *increase spatial inequalities*: a higher proportion of people will be in low and medium income housing in the inner / nineteenth century areas and twentieth century public housing, and will have smaller houses, more sub-divided houses, less access to back gardens or larger open spaces and greater traffic – housing workers for the capitalist economy. By contrast, the policy will increase the privilege of the wealthy in the highest IMD areas who retain greater access to green spaces (including the green belt), more car-ownership yet less road traffic, and a range of minority-community facilities. By contrast, only building social housing in high IMD areas will achieve an objective of reducing spatial inequalities.

We welcome that para 2.10.4 recommends that 'boroughs should use their local knowledge and that of their communities to identify and understand the particular needs of the area. The individual measures of deprivation that make up the IMD should be used to identify specific areas that are affected by particular issues, and regeneration strategies, investment and the approach taken in Local Plans'. The *lowest 20% should not be separately identified* but, rather, all areas should be considered and prioritised in relation to their needs. The IMD 20% area is artificial, yet could become an incentive to another cycle of London 'slum clearance'.