

THE REGENT'S PARK CONSERVATION AREA ADVISORY COMMITTEES

2 March 2018

Sadiq Khan, Mayor of London
New London Plan
GLA City Hall
London Plan Team
London SE1 2AA

11 pp. sent by email to: londonplan@london.gov.uk

Dear Sadiq,

Submission on the Draft New London Plan

1.0 Introduction

1.1 This submission is made by The Regent's Park Conservation Area Advisory Committee.

1.2 We are a standing Committee, directly drawn from our local communities, formally recognized by Camden Council, and established under a constitution agreed by Camden. We provide the Council with independent advice on all aspects of planning and development which affect our conservation area. We draw on members with a wide range of local expertise, including the professional expertise of our architect members.

1.3 This submission has drawn on the work of the Committee of Chairs of Camden's Conservation Area Advisory Committees. Our submission was outlined at our RPCAAC meeting on 5 February 2018, and this draft was circulated and approved by the Committee.

1.4 This submission is wholly independent of the London Borough of Camden's response. We have not been consulted by Camden on any aspects of the Draft New London Plan.

2.0 Objectives of our submission

2.1 As local communities we welcome many of the aspirations of the Draft New London Plan, especially in the provision of affordable housing, affordable employment space, green space, clean air, and the protection and enhancement of the heritage which makes London's localities distinctive – which makes our areas home for our communities.

2.2 Much of our submission seeks to address what we see as inconsistencies, or potential conflicts between policies. We know how, if these are not resolved at this stage, they will lead to delay in policy formulation and frustration in development management decisions. This can only lead to the frustration of Plan objectives and implementation.

2.3 It also leads to disenchantment with the planning process, and with democracy itself. This can further frustrate active citizenship, and diminish diverse engagement. We welcome the Mayor's stated intention of working collaboratively with local communities in realizing the objectives of the Plan. We see our submission as part of that collaboration, and look forward to a positive response to our submission and to developing the Plan further together.

3.0 Submission. Our submission is ordered by Plan Policy, and, for the sake of clarity, is not further numbered.

All proposed deletions to text are showed ~~struckthrough~~: all additions are underlined.

Chapter 1 Good growth

- GG2 – C** **Draft policy:** ‘Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London’s distinct and varied character.’
- Our proposed amendments – reasoning:** Our proposed revised text would ensure consistency with the rest of the Plan, and with the Plan’s stated heritage objectives.
- Our proposed revised text:** ‘Understand what is valued about existing places and use this as a catalyst the essential core for carefully planned and monitored growth and place-making, protecting and actively strengthening London’s distinct and varied character.’
- GG4 – C** **Draft policy:** ‘Create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.’
- Our proposed amendments – reasoning:** we welcome the creation – and continuation – of inclusive communities, and of high standards of design. Both require an understanding of the distinctive sense of place in each location. Our proposed revised text would help ensure the success of this policy, and achieve consistency with rest of the Plan, and with the Plan’s stated heritage objectives.
- Our proposed revised text:** ‘Create mixed and inclusive communities, with good quality homes that meet high standards of design, and provide for identified needs, including for specialist housing, and respect local distinct and varied character, preserving and enhancing heritage assets.’

Chapter 2 Spatial Development / opportunity areas

Major concern: we are very concerned that the definitions of areas for growth, both Opportunity Areas and Strategic Areas for Regeneration are not sufficiently precise. So Figure 2.1, read with Figure 2.3, and Figure 2.11 indicate, but do not define, Euston as well as King’s Cross as Opportunity Areas. The figures also show much of Camden, including comparatively prosperous areas, and areas of considerable local distinctiveness, as broad Strategic Areas for Regeneration. This is seen as threatening by local communities.

- SD1 A 1** **Our proposed amendments – reasoning:** Our proposed revised text would ensure consistency with the rest of the Plan, and with the Plan’s stated heritage objectives.
- Our proposed revised text:** to add a new d) after c) and before present d): ‘d) protect and strengthen heritage assets and the areas’ distinct and varied character’
- SD1 B** **Our proposed amendments – reasoning:** we are very concerned (see above) that the opportunity areas are inadequately defined, leading to alarm in local communities as local areas are seen as under ill-defined but general threat. Our objective is to have the clearest possible boundaries, defined at the earliest opportunity in collaboration with local communities, and so consistent with the Mayor’s stated objectives for collaborative working with local communities.



Our proposed revised text: To add to SD1 B a new point 1: 'Clearly define the boundaries of the Opportunity Areas within their Borough Plans in collaboration with local communities'.

SD1 B

Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, with the Plan's stated heritage objectives, and with the Mayor's stated objectives for collaborative working with local communities.

Our proposed revised text: after 4) and before 5), proposed new '5)': '5) preserve and enhance heritage assets, settings, and character in and adjacent to the Opportunity Areas, working in collaboration with local communities'

Para 2.1.66 p. 53 Text on Euston Opportunity Area (no. 39)

Draft text: 'Scope exists to reconfigure Euston Square Gardens'.

Our proposed amendments – reasoning: We propose the deletion of the reference to 'reconfigure', and further revision, to ensure consistency with the Euston Area Plan (formally adopted) and avoid a loss of trust in democracy. This Draft proposal is not included in the Euston Area Plan, and the adoption of this statement would tend to pre-judge an issue which is subject to future due process, including public consultation, by the London Borough of Camden.

Our proposed revised text: Scope exists to ~~reconfigure~~ improve Euston Square Gardens, and by reducing the impact of the bus station, to enhance this space and improve transport facilities, respecting its historic footprint whilst prioritising sustainable transport modes for onward travel, with a focus on the creation of Healthy Streets.

SD6 A 2)

Draft policy: 'locations for mixed-use or housing-led intensification and higher-density renewal, securing a high-quality environment and complementing local character and heritage assets'

Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, with the Plan's stated heritage objectives, the recognition at Annex 1 Town Centre network p. 462 'Many have important clusters of civic, public and historic buildings.', and with the Mayor's stated objectives for collaborative working with local communities.

Our proposed revised text: 'locations for mixed-use or housing-led intensification and higher-density renewal, securing a high-quality environment ~~and complementing local character and heritage assets~~ preserving and enhancing heritage assets and complementing local character.'

SD6 A 4)

Draft policy: 'the main focus for Londoners' sense of place and local identity in the capital'

Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, with the Plan's stated heritage objectives, the recognition at Annex 1 Town Centre network p. 462 'Many have important clusters of civic, public and historic buildings.', and with the Mayor's stated objectives for collaborative working with local communities.



Our proposed revised text: ‘the main focus for Londoners’ sense of place and local identity in the capital, based in local landmarks, open spaces, views, and heritage assets’

SD6 after J **Our proposed amendments – reasoning:** Our proposed new text would ensure consistency with the rest of the Plan, with the Plan’s stated heritage objectives, and with the Mayor’s stated objectives for collaborative working with local communities.

Our proposed additional text: a new para ‘K’ ‘K The role of heritage assets in tourism, and in the local sense of place, should be recognized and heritage assets preserved and enhanced as valuable components contributing to the Town Centre strategy.’

SD7 C We **object** to the designation of Camden Town as a Metropolitan Town Centre, at our submission on Annex 1. At this location (SD7 C) we note that the powers granted to the Mayor, and referenced in this policy, would allow the Mayor to act as planning authority in such areas, taking away planning powers from our local Council.

SD9 C 1) We welcome this policy on the introduction of appropriate Article 4 Directions to limit the loss of functioning work-space in specific areas.

SD10 general **General comment 1:** As we explained in our introductory statement on Chapter 2, we are very concerned that the definitions of areas for growth, both Opportunity Areas and Strategic Areas for Regeneration are not sufficiently precise. Figure 2.19 is insufficient for clear identification: the uncertainty resulting is harmful to local communities.

General comment 2: On Strategic Areas for Regeneration we strongly urge reviewing the use of the Index of Multiple Deprivation as the criterion for ‘strategic areas of regeneration’ (2.10.1). IMD is a proportionate rather than absolute index, and so will always have a lowest 20%. Thus, it would be illogical to use IMD based on personal characteristics for decisions on rebuilding houses: with a policy of returning the residents, the IMD would remain unchanged despite the investment. Similarly, there will be confusion between provision of social and rented housing for low-income groups with policies for area economic regeneration. The Plan should seek to improve housing 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. Specifically, the IMD status of areas of Camden Town is not an adequate criterion for which area should be designated as appropriate for ‘regeneration’.

SD10 A 1) **Draft policy:** [Boroughs should:] ‘identify Strategic Areas for Regeneration (see Figure 2.19) in Local Plans based on a thorough understanding of the demographics of communities and their needs’

We propose 2 textual amendments to this policy.

Our proposed amendments – reasoning 1: to achieve clarity on the definition of Strategic Areas for Regeneration, to ensure that the Plan is effective;

Our proposed amendments – reasoning 2: to ensure effective collaborative working with local communities. The policy itself needs to embody the admirable insistence



on working in collaboration with local communities set out in text 2.10.3. The present wording of policy SD10 A 1) would allow a continued ‘top-down’ approach to regeneration which has, in the past, been so harmful to local communities.

Our proposed revised text: ‘identify and clearly define the boundaries of Strategic Areas for Regeneration (see overview Figure 2.19) in Local Plans based on a thorough understanding of the demographics of communities and their needs, and through effective collaborative working with local communities’

SD10 A 2) **Draft policy:** [Boroughs should:] ‘seek to identify Local Areas for Regeneration taking into account local circumstances.’

We propose 2 textual amendments to this policy.

Our proposed amendments – reasoning 1: to achieve consistency as in our proposed amendment to SD10 A 1).

Our proposed amendments – reasoning 2: to ensure that the admirable statement in 2.10.6 is effective. The statement is that Boroughs ‘should identify, protect and promote the places and spaces that are particularly valued by local communities, including cultural venues, heritage assets, community facilities ...’. The policy itself needs to embody this text to be effective as well as consistent.

Our proposed revised text: [Boroughs should] ‘in collaboration with local communities seek to identify Local Areas for Regeneration taking into account local circumstances, including places and spaces, such as heritage assets and community facilities, that are particularly valued by local communities, and which will be recognized as core elements to be preserved and enhanced in any regeneration.’

Chapter 3 Design

General: We welcome the references made to the requirement for ‘high quality development’ at **D1 B 2**); and respecting and enhancing local character and heritage assets at **D1 B 4**), and delivering ‘good design’ at **D2**.

Our proposed amendments – general reasoning: We seek to ensure that policy is consistent and effective, especially in terms of good design in relation to heritage assets, including Conservation Areas. In Conservation Areas local policies and guidance have been drawn up in collaboration with local communities. They seek to achieve Plan objectives in defining and safeguarding local character and appearance, buildings and spaces which are much-valued by local communities, and which are key elements in defining the sense of place which is so important to communities, to local cohesiveness, and to local economic success, including tourism.

D1 A after 4) **Our proposed revised text:** ADD new ‘5) ‘preserve or enhance heritage assets’

D1 B 4) **Draft policy:** [Development design should] ‘respect, enhance and utilise the heritage assets and architectural features that make up the local character’

Our proposed amendments – reasoning: to ensure that the Plan is consistent with legislation and the NPPF.



Our proposed revised text: [Development design should] ‘respect, preserve and enhance and utilise the heritage assets and architectural features that make up the local character’

D2 A7 We welcome this clause.

D2 D **Design Codes General 1:** we are concerned by the reference to Design Codes and their effectiveness. There must be concern that the NPPF’s statement (36) that design codes should ‘avoid overly prescriptive detail’ may make them an inadequate mechanism for managing density (**D6**) in complex and sensitive heritage areas. See also policy **H2 B 2**.

General 2: We are also very concerned over who prepares Design Codes. They need to be undertaken transparently in collaboration with local communities to be consistent with the Mayor’s objectives.

Our proposed amendments – reasoning: To achieve effective policy implementation, and consistency with the Mayor’s objective of working collaboratively with local communities.

Our proposed revised text: to ADD ‘Design Codes should be prepared by Boroughs transparently and in collaboration with local communities, respecting local distinctiveness, and preserving and enhancing heritage assets.’

D2 G 4 **Draft policy:** ‘design review recommendations are appropriately recorded and communicated to officers and decision makers’

Our proposed amendments – reasoning: to ensure consistency with the requirement for transparency at D2 G 1. Our experience is that, while design review is welcome, it lacks transparency, and is not open to scrutiny. Our amendment seeks to address both the means of better achieving high quality design, and the need to build trust in democracy.

Our proposed revised text: ‘design review recommendations are appropriately recorded and communicated to officers and decision makers, and made public for scrutiny in good time before officers’ recommendations are prepared.’

D8 Tall buildings

General 1: In general, we welcome Policies D8 A, B, C. We welcome the understanding that ‘tall’ is a relative term in context, that tall buildings should be grouped, rather than scattered, and that their impacts assessed and potential harm tested.

General 2: However, we also strongly urge that tall buildings are always assessed against alternatives, in particular, medium-rise high density development. This has, in our experience across Camden, and especially in housing development, generally been found to address the social needs of individuals and local communities more successfully than tall buildings. We urge that the statement at D8 C 1 d) be used in a more general context.

D8 B after 3) **Our proposed amendments – reasoning:** To achieve effective policy implementation, and consistency with the Mayor’s objective of working collaboratively with local communities.



Our proposed revised text: to ADD 4) 'an assessment of medium-rise and other alternatives undertaken in collaboration with local communities'.

Chapter 4 Housing

General: We acknowledge the very serious nature of the housing crisis in London, and welcome effective proposals to address it. We would seek to contribute to a plan which would address the problem by establishing means by which communities would welcome new housing, rather than oppose it. We fear that the Draft Plan increases opportunities for conflict, thereby decreasing the likelihood of effective implementation within a reasonable timescale. We, again, see working collaboratively with communities, and respecting local distinctiveness and heritage assets as key to successful implementation.

Our proposed amendments – reasoning: In respect of both our proposed amendments we note the statement at para 4.2.7, that 'Special attention will be required within conservation areas to ensure that increased housing provision is accommodated in a way that also complements and enhances an area, taking into account conservation area character appraisals and management plans.' We seek to incorporate this intention into policy. We also seek to ensure that the revised policy is consistent within the Plan, and with both national legislation, which recognizes that conservation areas have been assessed as areas the character and appearance of which it is desirable to preserve or enhance, and the NPPF.

H2 E **Draft policy:** '... the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision.'

Our proposed revised text: '... the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential ~~privacy~~ amenity, ~~designated~~ heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision.'

H 2 F 1) **Draft policy:** 'The presumption in favour of small housing developments should not be applied to: 1) statutory listed buildings ...'

Our proposed revised text: 'The presumption in favour of small housing developments should not be applied to: 1) statutory listed buildings, registered gardens, buildings which make a positive contribution to conservation areas, and the settings of these buildings.'

Chapter 6 Economy

E1 F We welcome this policy on the introduction of appropriate Article 4 Directions to limit the loss of functioning work-space in specific areas.

E1 G 1 **Draft policy:** '... take into account the need for lower cost and affordable workspace ...'



Our proposed amendments – reasoning: We would welcome a stronger support for affordable workspace, to ensure that development does not destroy local economies, local creative industry, and local communities and our diversity.

Our proposed revised text: ‘... take into account the need for lower cost and affordable workspace, and ensure provision for affordable workspace in developments ...’

E3 We welcome this policy.

Chapter 7 Heritage and culture

We broadly welcome these policies, and seek to enhance their effectiveness for the benefit of all communities.

HC1 A **Draft policy:** ‘Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London’s historic environment.’

Our proposed amendments – reasoning: to achieve consistency with the Plan’s general aim of working collaboratively with stakeholders, including local communities, and to recognize the long-standing role, and value, of local and specialist expertise, including local and national amenity bodies.

Our proposed revised text: ‘Boroughs should, in consultation with Historic England and other relevant statutory organisations, local community groups, local and national amenity groups, and relevant expert groups, develop evidence that demonstrates a clear understanding of London’s historic environment.’

HC1 B 2) **Draft policy:** ‘utilising the heritage significance of a site or area in the planning and design process’

Our proposed amendments – reasoning: to achieve better consistency with legislation on conservation areas and Listed Buildings.

Our proposed revised text: ‘to preserve, enhance, and utilize the heritage significance of a site or area in the planning and design process’

HC1 C **Draft policy:** ‘... The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. ...’

Our proposed amendments – reasoning: We welcome this policy and the recognition of the importance of cumulative impacts. Failure to assess cumulative impacts is a serious weakness in current heritage management. We seek to make it more effective.

Our proposed revised text: ‘... The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed, and taken into full account when harm to heritage assets in being assessed in decision making on applications. ...’

HC 3 ‘Strategic and Local Views’



General: We very much welcome the Mayor's recognition of Townscape Views in addition to the longer established Strategic Views. We welcome the listing of these views in the draft Plan (Table 7.1). We seek to add to these listed Townscape Views.

Our proposed amendments – reasoning: We propose additions to the list of Townscape Views in Table 7.1. Our additions seek to demonstrate greater inclusivity and respect for local communities, and greater recognition of distinctive local heritage.

Our additions have been tested against 3 main criteria. These are:

- Views which cross local authority boundaries.
- Views which include surviving set-piece, historical views.
- Views which include major local landmarks, which help define local areas.

Our proposed additions to Table 7.1

Regent's Park

General comment / reasoning: We note that many of these views constitute views of outstanding importance, internationally recognized, and crossing LPA borders.

- 1 the comprehensive panorama of the Park surrounded by terraces, with specific views to include
- 2 Along Chester Road east towards Chester Terrace
- 3 Along Chester Road west towards Queen Mary's Garden
- 4 From Gloucester Green north to Highgate
- 5 From the Broadwalk east-south-east towards Gloucester Gate, St Katherine's Church, Cumberland Terrace
- 6 view across the boating lake westward towards Sussex Place and Hanover Terrace
- 7 The view south to York Terraces East and West
- 8 The view through York Gate to the Marylebone church
- 9 Views north from Regents Park pitches to the Mappin Terraces and of the Snowden Aviary (London Zoo)

General request: Townscape views are valued highly by communities, and are often of fundamental importance to the sense of place, of local character and distinctiveness. Given that views may cross borough boundaries, we request that an effective mechanism be considered by the Mayor to enable local communities to identify views for inclusion in future versions of Table 7.1.

Chapter 8 Green Infrastructure and Natural Environment

We broadly welcome policy on Green Belt.

G3 C **Draft policy:** 'Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.'



Our proposed amendments – reasoning: We are very concerned that alterations to boundaries may harm historic spaces. Land swaps can be very harmful to local communities.

Our proposed revised text: ‘Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. There should be a presumption against changes to the boundaries of MOL which is also of heritage significance or community value.’

G4 A **Draft policy:** ‘Local green and open spaces should be protected.’

Our proposed amendments – reasoning: We welcome this policy, but seek to extend it to include public and private gardens, which can contribute to the ecological value of an area, to bio-diversity, as well as to the quality of life.

Our proposed revised text: ‘Local green and open spaces, including public and private gardens, should be protected.’

G7 We welcome the protection of ‘veteran’ trees and ‘trees of quality’: we seek more effective protection of mature trees.

Chapter 9 Sustainable infrastructure

General request 1: We would welcome a presumption against planning consent for the installation of air-conditioning plant, especially in traditional buildings. Our concern is both to do all we can to minimise the use of energy, but also to address the impact on adjacent buildings, residents and workers.

General request 2: Given the need for more housing, and the development of Town Centres, we are concerned to ensure that the ventilation of retail food outlets does not harm the amenity of residential space.

SI 1 We welcome effective and urgent measures to improve air quality.

SI 13 C We strongly welcome this policy on sustainable drainage on driveways etc.

SI 15 after para 9.15.9. We request the addition of a new para 9.15.10.

Our proposed amendment – reasoning: to ensure the inclusion of canals, which contribute significantly to local character and distinctiveness, as well as offering sustainability gains.

Our proposed additional text: ‘9.15.10 The opportunity to expand the numbers of safeguarded wharves should be extended to the canal network.’

Chapter 10 Transport

T1 A 1) **Draft policy:** ‘the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041’

Our proposed amendments – reasoning: We very much welcome this policy. We seek to add to it to encourage sustainable use of water transport.



Our proposed revised text: ‘the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle, water, or public transport by 2041’

Chapter 12 Monitoring

We welcome, in principle a KPI for heritage performance of the Mayor and GLA, but don’t understand what the current draft means. ‘KPI Impact of development on London’s heritage’ where the Measure would be ‘Positive trend in the reduction of harm and/or an increase in benefits to designated heritage assets in approved referable development applications (based on a rolling average).’

We would welcome discussion of a clearer policy.

Annex 1

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 appears to have made a reclassification for Camden Town against the policies of the local Borough and against the criteria of the Plan.

Our proposed amendments – reasoning: to achieve consistency in the Plan.

Our proposed revision: to return the designation of Camden Town to a ‘major town centre’ – or indeed to a local centre again – in Table A1.1.

Annex 3 Glossary

2. Sustainable development


We are concerned that the definition used is not the same as that used in the NPPF, and doesn’t include heritage.

We seek a revision to refer to the NPPF definition, and thereby to include heritage.

Conclusion:

We look forward to an active collaborative engagement with the Mayor and GLA in developing the Draft New London Plan.

Yours sincerely,



Richard Simpson FSA
Chair

