JWP/AJH DP4092

Strategic Planning and Implementation Team London Borough of Camden Judd Street London WC1H 9JE

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21 January 2016



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Dear Sir / Madam

KENTISH TOWN NEIGHBOURHOOD PLAN: SUBMISSION VERSION CONSULTATION

REPRESENTATIONS ON BEHALF OF AUGUSTUS REGIS LTD

These representations are submitted to London Borough of Camden ('the Council') on behalf of our client Augustus Regis Ltd ('Augustus Regis') in respect of the draft Kentish Town Neighbourhood Plan consultation ("the Neighbourhood Plan").

1. Background

- 1.1. Augustus Regis is the prospective landowner of the JML House site on Regis Road, Kentish Town ('the Site'). The Site is located a short distance west of Kentish Town Railway Station and Town Centre. It is currently located within a defined Industry Area, and occupied by JML as a television studio and offices (Class B1). The Site represents a key regeneration opportunity in light of emerging policy for mixed use development in the Kentish Town area.
- 1.2. Given the longer term regeneration and mixed-use redevelopment opportunities that are proposed by the Neighbourhood Forum in line with the draft Camden Local Plan, our client welcomes the publication of the latest draft Neighbourhood Plan and the opportunity to comment. Our client would like to make a number of specific comments on certain aspects of the draft document, which are set out below.

2. Representations

Draft Policy SW1: Supporting Small Business

2.1. Augustus Regis supports the principle of retaining and increasing floorspace available for the use of business, small or large. Drawing on the accompanying text to the draft policy, there is an unmet demand for employment premises within the KTNP area, an emerging hub providing work-space for start-up, micro and small business. However, it is unclear what the rationale is for a 232sq.m upper limit on business floorspace increases. We would suggest that the draft policy wording is amended to remove any specific floorspace limit, and focus on the provision and uplift in employment floorspace within Class B, irrespective of size.

Draft Policy SP2: Kentish Town Potential Development Area (KTPDA)

- 2.2. Augustus Regis strongly supports the principle of the KTPDA and recognition of its potential for mixed use development, whilst retaining and where possible increasing employment opportunities. This general direction of travel accords with the draft Camden Local Plan (in particular, draft policies G1 and E2).
- 2.3. The Kentish Town area, and in particular Regis Road, is well connected by a range of public transport modes, including rail and bus. Regis Road and the overarching KTPDA represents a significant land holding in a sustainable location, well suited to mixed-use development of an appropriate scale to deliver new homes and economic development. The future of this part of Kentish Town, regenerated as a new mixed-use neighbourhood, is strongly supported by Augustus Regis.
- 2.4. The regular review of employment allocations and consideration of alternative land uses is advocated at national level, the NPPF stating:

"Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities." (Para. 22)

2.5. Notwithstanding the above, we would suggest that the draft policy wording refers to 'employment' rather than 'industrial' floorspace given that the latter can often be incompatible with other uses, such as residential, as part of mixed-use schemes. We would also suggest that the reference to a Development Framework is maintained, but flexibility added so that regeneration schemes that come forward in advance of such a Framework are not penalised, but treated positively if they are seen to respond to the emerging objectives and vision for the area.

Draft Policy SP2a: KTPDA – General Development Criteria

- 2.6. Augustus Regis supports the principle of general development criteria to inform and guide new proposals in the KTPDA. This provides greater certainty for developers and assists in the early stages of site appraisal and design work.
- 2.7. In accordance with our comments on draft policy SW1, we would suggest that reference to 'industrial floorspace' under SP2a)i) is replaced with 'employment floorspace' to ensure compatibility between land uses in future mixed-use schemes.
- 2.8. Housing for the growing population of elderly is noted as an important element of future development proposals in this area, and across the country. However, the wording of SP2a)v) should be amended so that such uses are 'supported' rather than 'included' in proposed development schemes. As currently drafted, the wording would seem to suggest that all development schemes should include a proportion of housing for the elderly, which clearly may not be appropriate, deliverable or viable depending on site-specific circumstances.
- 2.9. Appropriate levels of mitigation, related in scale and kind to proposed development, can be important aspects of bringing forward redevelopment proposals. To ensure compliance with relevant national and local legislation/policy, we suggest that SP2a)vi) specifically refers to mitigation outside of the remit of Community Infrastructure Levy Regulations, and in accordance with Camden's guidance on Planning Obligations.

3. Concluding Remarks

- 3.1. We trust that the above representations are clear and that they will be taken into account in the next stage of the Neighbourhood Plan. We also request that we are consulted on any future planning policy documents concerning the area, including Employment Land Reviews, or Development Framework (or similar).
- 3.2. If you require any additional information or would like to discuss this matter further then please do not hesitate to contact me or my colleague Alan Hughes at this office.

Yours faithfully

JW Pool Director DP9 Ltd 28 January 2016 16.01.28 L CB Camden prop sub Kentish Town NP



Sent by email to: planningpolicy@camden.gov.uk

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Dear Sir/Madam

CAMDEN – KENTISH TOWN NEIGBOURHOOD PLAN – COMMENTS ON BEHALF OF THAMES WATER UTILITIES LTD

Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water's appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water.

As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory water and sewerage undertaker for London Borough of Camden and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document on behalf of Thames Water:

Page 10 – Infrastructure and Utilities

SUPPORT

Thames Water are pleased to see that our representations from April 2015 have been considered and that a paragraph on Infrastructure and Utilities has been included on page 10.

We trust the above is satisfactory, but please do not hesitate to contact me if you have any queries.



(Hons), MSc, MRTPI

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Date 29th January 2016

Your Reference

Our Reference MBG/30318

By Email (planningpolicy@camden.gov.uk) And By Post

Strategic Planning and Implementation Team Camden Council Town Hall Judd Street London WC1H 8ND

Dear Sirs

Kentish Town Neighbourhood Plan Consultation

We write in order to make comment on the above named document. Please note that we act on behalf of the London Fire & Emergency Planning Authority (LFEPA) and that this representation is made on their behalf. For your information, the following LFEPA site is located within the subject area:-

• Kentish Town Fire Station – 20 Highgate Road, NW5 1NS.

Please note that we initially submitted a representation regarding this matter, during the consultation regarding the application of the Neighbourhood Forum, dated 17th December 2012. We did not receive a response to this and have not been notified of any further consultations regarding this draft Neighbourhood Plan, in spite of a formal request along these lines made in the letter of the same date. We again wish to highlight the matter raised previously.

We note that a small area at the front of LFEPA's Kentish Town fire station site, is shown on the map as being 'Green and Open Space.' Please note that this area falls within the freehold ownership of LFEPA and should not have a green or open space allocation on it. As previously informed, the site is highlighted for future possible redevelopment, in which case it is likely that a new building and/or a new fire station will need to include this area. We therefore request that the 'green and open space' allocation at the front of the site is excluded in it's entirety.

We trust the above is clear and confirm that we do wish to be notified of all progress relating to this matter, at the address above. Please do not hesitate to contact Mel Barlow-Graham should you require any further information, or further clarification regarding this matter

Yours faithfully



(N/CPG/30318/camden (Kentish Town) xa28 (MBG)

Regulated by RICS





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<u>Camden Council representation on the Kentish Town Neighbourhood Plan</u> <u>Submission version (January 2016)</u>

These comments are intended to form the Council's representation on the submission version of the Plan and include input from all relevant council departments.

The Council has previously provided comments to the Neighbourhood Forum on a number of working draft plans and the pre-submission plan (Regulation 14). Therefore the table below relates to those matters which were outstanding at the time the Plan was formally submitted.

Section	Comment
Plan Objectives and Policy SP2	The Council's borough-wide heat demand mapping project has identified Kentish Town as a priority area for Decentralised Energy (DE). The Council's emerging Local Plan recognises this in its policies and also identifies the development of a DE network as a priority for the Regis Road Growth Area.
	It is recommended that the Neighbourhood Plan refers to the Council's policy requirement (Camden Core Strategy Policy CS13 and Camden Development Policies DP13) relating to decentralised networks. This could be achieved through appropriate reference in the Plan's objectives on pages 12-13 and explicit identification in Policy SP2.
Policy SW1 and general	The reasoned justification accompanying Policy SW1 does not explain the significance of 232sqm. It would be helpful if the Plan briefly set out why this figure was specified.
	The closing paragraph of the justification sets out which strategic policies the neighbourhood plan policy is seeking to help implement (Camden Core Strategy CS5 and CS8), however it also refers in this section to supplementary planning guidance (Camden Planning Guidance 5) and parts of the Council's evidence base which do not form part of the development plan. The distinction between policies in the development plan, supplementary planning guidance and evidence should be made clear in the supporting text throughout the Neighbourhood Plan.
	It is recommended that text is added to the justification to explain the significance of 232sqm.
	We also suggest the justification for the neighbourhood plan policies should clearly distinguish between adopted Camden planning policy (in Core Strategy, Development Policies or Site Allocations documents), supplementary planning guidance and evidence / data commissioned by the Council has commissioned for planning purposes.
Reference to Camden	There are two references in the Plan to Camden's UDP (pages 44 and 73). The policies in the UDP have not been saved by the Council.

UDP	It is recommended that references in the text to Camden's UDP are deleted.
Provision of cycle parking	A number of policies refer to the provision of cycle parking to support new development (e.g. SSP3, SSP4, SSP6). The London Plan currently allows the Council to secure higher levels of cycle parking facilities for most use classes (residential, retail and office) than the standards set out in Camden's Development Policies document.
	It is recommended that policies seeking cycle provision reference Policy 6.9 of the London Plan.
SW2	The Council understands the intent behind restricting the number of non-A1 uses within secondary shopping frontages but considers the policy as worded may inadvertently lead to an increase in vacant units in the town centre. A café, for example, may be preferable to leaving a unit empty and would contribute to the vitality of the town centre.
	We also consider it would be helpful for the supporting text to include a reference to Camden Planning Guidance 5 (CPG5) supplementary planning document as this shows the designated frontages. This guidance document can also advise applicants how the Council will calculate the proportion of non-A1 uses.
	It is recommended that the policy includes a greater degree of flexibility to avoid increasing the number of vacant units in the designated centre.
	To assist applicants, it would be helpful if there was a brief reference to Camden's supplementary planning guidance (CPG5) supplementary planning document as this shows the designated frontages and explains how the Council calculates the proportion of non-A1 uses.
D1	This policy has sought to replicate aspects of London Plan Policy 7.12 and the London View Management Framework Supplementary Planning Guidance which designates, protects and manages strategic views of London and ensure the recognition and appreciation of major landmarks is not adversely affected. Part J of Policy 7.12 specifically states Boroughs can use the principles of the policy to support the designation and management of local views.
	The Council understands that the Forum's broad intention is to draw on the principles and approach to managing development in "protected vistas". These are geometrically defined corridors which generally represent a rising or falling sightline between a viewing place and a strategic landmark (e.g. St Paul's Cathedral). The vistas distinguish between a "landmark viewing corridor" and "wider setting consultation area" for development management purposes; the Neighbourhood Plan seeks to replicate this approach through identifying 'protected' and 'peripheral' components of a viewing corridor towards the summit of Parliament Hill.
	We have concerns with the policy as currently presented. The diagram which sits under the policy does not appropriately distinguish between

the part of the corridor which is within the designated neighbourhood area and part which sits outside. The Neighbourhood Plan cannot apply policy outside of the designated neighbourhood area, however this policy gives the impression it can (this affects the majority of the land within the Murphy's site and an area continuing for some distance to the North East).
We support the Forum's aspiration that the effects of development on a cherished local view are thoroughly assessed however the wording which relates to the "protected corridor" is unduly restrictive and relies on an assumption that any development exceeding the height of a specified building within the Murphy's site would lead to significant harm. This conflicts with the Forum's aspirations for realising the development potential of this area (as expressed in Policy SP2). Policy D1, therefore, could frustrate the ability to realise a viable scheme on this site and contradicts the National Planning Policy Framework's (NPPF) positive approach to development. The conflict between policies D1 and SP2 is not considered to be consistent with the NPPF requirement to provide a clear framework for decisions on a planning applications.
The Neighbourhood Plan policy's approach to "peripheral areas" is more flexibly worded, however it would be helpful if the policy could provide more clarity on which factors might be influential to protecting views "as far as possible". A general concern with the policy is it does not set out how any effects on the viewing corridor might be understood or analysed. We suggest cross-reference to the types of evidence which the Council require for impact assessment would address this point. These evidence requirements are set out in Camden's 'Local Area Requirements'.
We also note that the scale of the map could make it hard for anyone to distinguish between the different parts of the viewing corridor within Kentish Town.
We suggest that the reference to viability is deleted as it is not directly relevant to what the policy is seeking to address.
It is recommended that the policy wording and diagram clearly distinguish between the part of the corridor which the Neighbourhood Plan is capable of designating and influencing and the remainder, the policy framework for which would have to be set in other neighbourhood or Council plans. It is important that the identified corridor outside of the neighbourhood area is not treated as a designation.
The text relating to the "protected corridor" requires re-wording in order to bring it into line with the 'balanced' approach sought by the NPPF to avoid stifling appropriate development in this area. The policy currently conflicts with the aspirations for the Murphy's site expressed in Neighbourhood Plan Policy SP2 and may prevent the delivery of viable scheme.
To ensure it is clear how decisions on planning applications

	should be made, the policy needs to set out the considerations which might apply to protecting views "as far as possible". We suggest cross-reference to the evidence requirements in the Council's 'Local Area Requirements' which are used to guide assessment of views.
	The diagram should be focussed on showing how the local views should be assessed and managed within the neighbourhood area.
	It is also recommended that reference to an assessment of viability is deleted.
D3	The Council's impression is that the policy is intended to deliver high quality in development schemes with opportunities taken for innovation where it would be appropriate to do so (e.g. in the context of the site and nature of the scheme).
	The title of the policy and references to "innovative" design lead to a degree of ambiguity, and would in our view, lead to the policy being applied in circumstances where isn't intended to be.
	It is unlikely that innovative design will be desirable, or even achievable, for all developments. A similar issue arises with reference to "innovative methods" as this would not be suitable for many minor developments.
	The term innovative itself may also be open to interpretation. The Council's opinion is that this term implies an original or pioneering or construction technique and possibly the use of novel materials. This does not seem to us what the policy, when read as a whole, is trying to achieve.
	The wording in criterion (a) "deep understanding of the site and its context" is too ambiguous to be meaningfully applied when dealing with a planning application.
	It is also unlikely that it will be possible to reinforce <u>and</u> enhance local character in all circumstances as required by criterion (b).
	We support the Forum's desire to see accessibility to buildings improved in criterion (e). The policy, however, needs to acknowledge there will be some circumstances where accessibility cannot be improved any further, e.g. without harm to a building's fabric.
	The supporting text refers to "design review". The Council is setting up a design review panel to consider certain schemes throughout the borough. The Council will need to have discretion to determine which schemes in the Borough should be taken to the Panel (and this may change over time). We therefore suggest that the Neighbourhood Plan recommends that major schemes are subject to design review, rather than appearing to bind the Council into a particular course of action in the future.
	It is recommended that the policy should clarify in what circumstances 'innovative' design would be appropriate and not seek to apply this as a requirement for all developments.

	The wording "deep understanding" requires further clarification or should be deleted from the Plan.
	We suggest criterion (b) refers to reinforcing and <u>/ or</u> enhancing local character.
	The reference in the criterion (e) to accessibility should clarify that there may be circumstances where it would not be appropriate to enhance accessibility.
	We strongly suggest that a "requirement" for all major schemes to be referred to a design review panel is removed. This may not be appropriate or achievable. This could conflict with the Terms of Reference for the design review panel and may be interpreted as binding the actions of the Panel/Council which we consider is outside of the Neighbourhood Plan's responsibilities.
D4	The Council assumes that the Forum has identified these buildings for the purposes of applying paragraph 135 of the National Planning Policy Framework (NPPF) which relate to the effect planning applications may have on the significance of non-designated heritage assets.
	While we support the Forum in identifying buildings/ features of merit, we consider it would also be beneficial for assets identified in the neighbourhood planning process to be nominated for inclusion in the Council's 'Local List' in the future. This means that these buildings/features will also have been comprehensively assessed by the Council on a consistent basis. We intend to keep the Local List under review and therefore, the neighbourhood plan proposals could be considered further as part of the next review.
	It is recommended for that the Neighbourhood Plan recommends nomination of these locally identified assets for inclusion on the Local List. This is because the Council considers there may be additional benefit from their inclusion alongside other assets identified as being of heritage significance to the Borough.
CC1	In order that the Council and developers fully understand what action they need to take, the policy's supporting text needs to set out what might be included in the suggested 'Statement of Community Consultation' and 'Statement of Neighbour Involvement'. There is currently insufficient detail and therefore, it is not clear whether these evidence requirements form a reasonable approach.
	It is important that, in line with the NPPF, that the information sought for planning applications is proportionate to the nature and scale of development proposals, relevant, necessary and material to the application.
	It is recommended that the Plan clarifies what the Forum would like to see included in the 'Statement of Community Consultation' and 'Statement of Neighbour Involvement' and which type of schemes they may be used to assist decision making. Only then will it be possible to determine whether the plan's approach is reasonable and consistent with the NPPF.

SP2	The Council supports the community's aspirations to set out key principles for development in the event that the strategic planning context for the Regis Road area changes. The Neighbourhood Plan acknowledges that the industry area designation can only be altered through changes to the Borough's planning policies. Camden Council's emerging Local Plan (Policy G1) seeks re-designation of <u>part of</u> the industry area for mixed use development, including residential. This policy change will be tested through the forthcoming Local Plan examination (in the Autumn of 2016). We note that the Plan's position for the Murphy's site is not consistent with either the adopted planning framework or the Council's emerging Plan. The Council has no objection to this approach as the supporting text acknowledges this policy would only apply in the event the Council's planning policy changes.
SSP1	We support the aspirations for the car wash site however the Council would generally expect a scheme to be of high quality. The "highest architectural quality" as presently sought by bullet (c) of the reasoned justification is a more onerous test and is not necessarily a reasonable expectation.
	It is recommended that a minor modification is made to the supporting text to clarify that a high quality design is expected.
Other comments	The two references in the plan to English Heritage need only refer to "Historic England"
	It is recommended that the references to English Heritage are replaced by Historic England as a factual update to the Plan.

SENT BY EMAIL AND POST: planningpolicy@camden.gov.uk

Our Ref: MR/CE/17019 Direct Dial: 0207 832 1475 email address: matthew.roe@cgms.co.uk

Kentish Town Community Centre 17 Busby Place London NW5 2SP

29th January 2016

Dear Sir/Madam,

KENTISH TOWN NEIGHBOURHOOD FORUM DRAFT SUBMISSION KENTISH TOWN NEIGHBOURHOOD PLAN REPRESENTATIONS ON BEHALF OF THE ESTATE CHARITY OF ELEANOR PALMER

We write on behalf of our client, The Estate Charity of Eleanor Palmer, to submit representations to the Draft Kentish Town Neighbourhood Plan (KTNP). We previously made representations on the draft Kentish Town Neighbourhood Plan in April 2015. Following the first round of consultation the Kentish Town Neighbourhood Forum has now submitted the final version of their Neighbourhood Plan to the Council for public consultation in accordance with the Neighbourhood Planning Regulations.

Our client, The Estate Charity of Eleanor Palmer, is a charity that manages a property asset in Kentish Town for the benefit of two designated 'relief in need' charities. These representations are made with particular interest to their site at the rear of 36-52 Fortess Road, Fortess Garage and 20 Fortress Grove. Please see attached the site location plan attached at **Appendix A.** Representations are thus submitted:

- 1. To detail their development aspirations for the specific site given its underutilised nature;
- 2. To recommend that the site is allocated as a site for 'potential for development/better use' on the draft proposals map as it was previously in the first round of consultation;
- 3. To recommend that a policy is drafted that supports the redevelopment of the site and does not restrict this to a specific commercial use; and
- 4. To identify the lack of policy on housing, mindful of the housing need within Kentish Town.

The representations, on behalf of our client, to the Draft KTNP in regards to the above are set out in the following paragraphs.

Background to the Site

The site at the rear of 36-52 Fortess Road, Fortess Garage and 20 Fortress Grove at relates to a single storey vehicle workshop premises, a single storey warehouse and a dwelling located on the east side of Fortess Road and the northern side of Fortess Grove. The surrounding area is predominately residential.



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Offices also at: Birmingham, Cheltenham, Dorset, Edinburgh, Kettering, Manchester, Newark The site covers approximately 0.17ha and sits between Fortess Road and Leverton Street, north of Kentish Town Station in Camden. The existing buildings completely occupy the site. Access to the site is from both streets via two mews, Fortess Grove and Railey Mews.

The surrounding area is characterised by primarily residential dwellings with ground floor commercial use along Fortess Road. The buildings immediately along Fortess Road are 4 - 5 storeys in height with Leverton Street being lower in scale. The immediate mews streets are lower in scale and generally two storeys in height. Part of the site sits within Kentish Town Conservation Area.

The industrial buildings at the site date back to 1930s/40s and their configuration is poor. They are currently in a state of disrepair and partly occupied by a car workshop. However, there are a number of limiting factors to the site to be able to maximise the floorspace and the commercial capacity. The constraints to the existing buildings include the height, the split level floors and the capacity parking/unloading facilities. These contribute to the buildings limited capacity to be fully occupied. Given the constraints and that the site is significantly underutilised, we believe that the site can be redeveloped to a more appropriate use given its location in the heart of Kentish Town.

Background to Representations

We previously made representations on the draft Kentish Town Neighbourhood Plan in April 2015 where the site was designated for 'potential for development/better use' on the draft proposals map. A summary of our representations from April our as follows;

- A policy should be drafted to detail the 'development for better use' designation and our site should be allocated for a mix of uses.
- Draft Policy SW1 should be elaborated to give consideration to the quality of the employment floorspace where businesses are located and should not restrict sites which employ up to 20 employees. Further evidence is required to justify this policy.
- A policy should be drafted to encourage the development of housing in Kentish Town. This is currently absent from the draft KTNP and we would encourage that this use is promoted widely on the redevelopment of sites.
- We support Policy D3 'Design' and would encourage the policy to further explore a modern approach to redevelopment.
- Draft Policy CC1 should be scaled back to include various methods of public consultation for major developments. Development briefs should be removed from the policy as the requirement is extensive prior to a planning application being submitted.

Response to our Representations

Following the representations detailed above, the KTNF responded to these points and this is set out in Appendix 15 of the KTNF Consultation Statement. The response is as follows;

• SW1: We have considered including the suggested caveat but have decided against it because the policy as it stands is crucial to aid the retention of small businesses and the health and vitality of Kentish Town

- D3: We consider the policy covers all aspects of innovative development
- CC1: A Development Brief is a central aspect of the policy. We will not be removing it from the policy.
- Housing: KTNF has not included a separate policy on housing. This is because housing is included in many of the Plan policies.

Representations to the Submission Draft KTNP

Existing Employment Use of the Site

Draft Policy SW1 'Supporting Small Businesses' has since been revised to state that the plan supports the retention and increase of floorspace up to 232sqm for the use of small businesses. This has evolved from the forums' concerns regarding permitted development rights which allow the conversion from offices to residential and is based on Camden's Development Management Policy DP13. In line with our representations made in April 2015, we do not support this policy. We would encourage that this policy is further explored to have consideration to the type of business premises and their suitability to remain in employment use at specific locations.

We believe this should be calculated on site viability, location and condition of premises and asses the businesses need to re-locate in certain circumstances. It should be noted that certain employment buildings are in a poor condition and can be redeveloped to offer an increased employment capacity as identified in paragraph 22 of the NPPF. Furthermore, we do not consider the response of the KTNF sufficient to warrant a reason for non-action. An inflexible policy which does not take into consideration site viability or the wider context of the development is far too restrictive and cannot be considered to reflect the principle of sustainability as set out by the NPPF.

Therefore, we reinforce our previous comments regarding draft Policy SW1 'Supporting Small Businesses'. It is considered that this policy should include a caveat which gives consideration to the quality of the employment floorspace weighed against the potential to redevelop. The policy should avoid the long term protection of sites for employment use as identified by paragraph 22 of the NPPF. In terms of the redevelopment of the site (identified on the location plan enclosed at **Appendix A**), we believe that it is an exception to the policy and the redevelopment of the employment floorspace should be considered given the existing configuration of the site and its context within a largely residential area.

Designation on the Site

The site was designated for 'Potential for development of better use' in the April Draft version of the KTNP. This was wholly accepted and supported by our client and the draft document stated that the site should be allocated for a mix of uses. It was assumed that this designation recognises underutilisation of particular sites and sought to promote better development opportunities which maximise development potential.

However, the current submission draft for the KTNP has deallocated the site. It is no longer designated as a site for 'Potential for development of better use' despite no redevelopment having taken place. There is also no justification given as to why the site has been removed from this designation in the response to our representations. Thus we would refute the removal of our site from designation for 'potential for development of better use'. The current site remains underutilised despite its location within a highly sustainable location and widely residential area. Our client has identified this and is exploring a number of options to redevelop the site to comprise a residential led development including the replacement of commercial floorspace. The mixed use redevelopment of the site will offer the opportunity to enhance the localised economy through providing commercial floorspace that has the capacity to provide more jobs than the existing use and considerable economic benefit.

It is recommended that the site is reallocated for development as detailed in the earlier April draft. Furthermore, a more detailed policy should be drafted for these sites which sets out what constitutes an acceptable development. We would encourage that at this site a residential led mixed use scheme is promoted to both re-provide high quality commercial space and contribute towards the local and wider housing land supply.

Housing Policy

Core Objective 3 of the KTNP states that the Plan will identify vacant and underused sites for the development of well-designed housing. However, whilst the KTNP recognises a shortage of housing within Kentish Town and identifies sites for future housing provision, it fails to set out any specific housing policy.

The response to our earlier representations noted that there was no specific policy regarding housing because it is included in many of the Plan policies. However, whilst we agree that housing is noted in other areas of the Plan we would encourage a specific housing policy to be drafted in line with the housing policies adopted by Camden Council (Core Strategy Policy 6 and Development Management 2 and 3) and encourages residential development to meet the identified need. This would ensure greater clarity and therefore certainty regarding housing within the KTNP area.

Design

Policy D3 details design principles for 'innovative building design' and details a criteria of which redevelopment and development proposals should meet. This includes:

- a) Proposals must be based on a deep understanding of the site and its context;
- b) Proposals must be well integrated into their surroundings and reinforce local character and the local street scene;
- c) Proposals must identify and drawn upon key aspects of character, or design cues from the surrounding area;
- d) Design proposals must be of the highest quality; and
- e) Proposals must enhance accessibility in buildings by taking into account barriers experienced by different user groups.

We welcome Policy D3 which supports the redevelopment of existing buildings where proposals show an in-depth understanding of a site and its context. The policy details expectations of the design of proposals, however, we would encourage that point 'b' is further explored. Whilst the KTNF considers this policy to cover all aspects of innovative development, we would continue to encourage the further development of this policy. Given the density of Kentish Town and the number of infill sites, we would encourage that a modern approach is considered

further to allow development to be unique and contribute to the character of Kentish Town. This is in accordance with Camden Council's Core Strategy Policy 14 and Development Management Policy 24.

The redevelopment of the site is proposed to be of a high quality and illustrates an understanding for the site and its context in terms of design, scale and use of materials. The proposal will contribute to the existing character of the area, in particular the mews character.

Community and Culture Policies

Draft Policy CC1 'Statement of Community Consultation' details that major developments are strongly encouraged to submit a development brief to KTNF and to LB Camden, and to actively engage in consultation with KTNF and the community, including hard to reach groups and groups with protected characteristics, as part of the design process prior to submitting a planning application.

We would promote the consultation process in respect to redevelopment of sites in Kentish Town and understand that local resident feedback is important, however, we refute the need for a development brief prior to an application being submitted. This was raised during our earlier representations and the KTNF responded noting that a development brief is a central aspect to the policy and would not remove this from the policy.

However, we consider the detail required at this stage of the development process to be extensive. We believe that this would hinder and delay development coming forward on available sites and consider other methods of public consultation to be far more valuable in addition to pre-application meetings with the LB of Camden. It is also considered that the justification for deciding to include this from the policy is not sufficient or explained fully.

As part of the development process of the site, the consultant team have engaged in pre-application meetings with the planning officers at Camden Council and partaken in a local consultation exercise to obtain the public views on the proposed re-development of the site. This has been a valuable exercise to engage the local community.

We would again encourage that this policy is scaled back to detail methods of public consultation only and the requirement for a development brief is removed as this will hinder and delay development coming forward in Kentish Town.

Strategic Environmental Assessment of the KTNP

Consultation is also sought on the associated documents to be submitted as part of the proposed Neighbourhood Plan. The SEA November 2015 update considers the effects of a draft plan and its alternatives. Our comments on the updated report are detailed below.

Screening out sites

Part 2 Chapter 10 details the reasons for focusing on a particular policy area. Paragraph 10.2.4 notes the justification for screening out sites to determine whether alternative assessment was warranted. We would refute the lack of justification for the deallocation of our site and the lack of detail regarding what development would be best suited here. We would recommend that our site is specifically referred to in the document and that it is supported for residential-led mixed use redevelopment.

Preferred Approach

Part 2 Chapter 12 states the reasons for selecting the preferred approach to the Kentish Town Potential Development Area. Paragraph 12.2.4 notes that the Murphy site is the last dedicated area of light industrial land and warehousing in Camden; however... there is an acute need to deliver housing, offices and 'space for start ups'. Furthermore, paragraph 12.2.5 provides the following justification for this preferred approach;

- There is an extreme shortage of housing in Camden (and in London in general), and the policy will provide a very large number of homes.
- During public consultation, people in Kentish Town have said that the Industrial Area is not integrated within the community and they would like to see housing included in the area.
- The policy is written in a way that seeks to mitigate any negative effects. It states that new proposals must allow for employment levels on the Regis Road site to be no less than those existing on the same site area and that, on the Murphy site, light industrial uses will be allowed to continue to operate, alongside residential uses, in order to ensure the continuing viability of these uses.

We wholly agree with and support the above justification regarding the extreme housing shortage, need for site integration and complementary uses. Our site and the proposed development would contribute to meeting the identified housing need whilst its modern design promotes site integration. The reprovision of some commercial space alongside the residential development encourages a variety of complementary uses at this underutilised site. We would therefore encourage the site to be reallocated for development in line with the above justification for the Kentish Town Potential Development Area.

Compliance with Basic Conditions

A neighbourhood plan is required to meet a number of legal requirements. The following are the basic conditions the proposed neighbourhood plan is legally required to comply with;

- 1. The Neighbourhood Plan proposal is being submitted by a qualifying body
- 2. The proposed Neighbourhood Plan states the period for which it is to have effect
- 3. The proposed Neighbourhood Plan does not relate to more than one neighbourhood area and there are no other Neighbourhood Development Plans in place within the neighbourhood area

We agree that the above criteria are satisfied. However, we do not consider the basic conditions to be met in regards to compliance with the wider policy context. We refute the statement that Policy SW1 ensures the vitality of town centres in line with the NPPF. Instead, in its current form, this policy has a negative impact on vitality as sites which are available for redevelopment are prevented from doing so by the excessively strict policy.

Recommendations

We have summarised the key points that we would like to make to the draft submission KTNP on behalf of the Estate Charity of Eleanor Palmer. These are as follows:

- The site at the rear of 36-52 Fortess Road, Fortess Garage and 20 Fortress Grove should be reallocated as a site for the 'development for better use'.
- A policy should be drafted to detail the 'development for better use' designation.
- A site specific policy should be drafted for our site which should allocate the site for a mix of uses.
- Draft Policy SW1 should be expanded with a caveat to give consideration to the quality of the employment floorspace where businesses are located. Further evidence is required to justify this policy.
- A policy should be drafted to encourage the development of housing in Kentish Town to clearly site out the approach to housing within the KTNP area. This is currently absent from the draft KTNP and we would encourage that this use is promoted widely on the redevelopment of sites to meet the identified housing need.
- We support Policy D3 'Design' and would encourage the policy to further explore part 'b' and promote a modern approach to redevelopment.
- Draft Policy CC1 is excessive and too restrictive. It should be scaled back to include various methods of public consultation for major developments. The requirement for a development brief prior to the submission of a planning application should be removed from the policy as this is unreasonably arduous at this stage. Further justification for its need should be provided.

Please acknowledge receipt of our representations to the Kentish Town Neighbourhood Plan Consultation. We look forward to discussing matters with you further in the future.

Yours faithfully,



Bethan Hawkins Planner

APPENDIX A



From: Sent: To: Subject:

PlanningPolicy Kentish Town Neighbourhood Plan

I am writing to support those aspects of the Kentish Town Neighbourhood Plan that relate to permeability for pedestrians and cyclists through the Regis Road and Murphy's sites as and when they come up for re-development. This specifically is outlined in policies SP2 and SP2a on pages 40-45 of the submission plan.

In particular I would like to fully support the proposed access into and through the Regis Road site from the south, east and west and I encourage the construction of further permeability across the railway to the north into the Murphy's site if/when this area is developed.

--Regards John Chamberlain 11 Grove Terrace London NW5 1PH

From:	Crossroads Women <contact@crossroadswomen.net></contact@crossroadswomen.net>
Sent:	29 January 2016 17:10
То:	PlanningPolicy
Subject:	Kentish Town Neighbourhood Plan consultation

To Camden Council Planning Dept

Dear Madam/Sir

Please find below comments by Crossroads Women on the Kentish Town Neighbourhood Development Plan 2015-2030.

We appreciate the time and effort which has been put into developing the Neighbourhood Plan and we welcome all its main objectives.

Thank you for considering our comments.

Anne Neale

Peer Support & Volunteer Co-ordinator Crossroads Women's Centre 25 Wolsey Mews London NW5 2DX Tel: 0207 482 2496 <u>www.crossroadswomen.net</u>



To Whom It May Concern Kentish Town Neighbourhood Development Plan 2015-2030 - Comments by Crossroads Women, 25 Wolsey Mews, London NW5 2DX

We make the following specific comments

Vision

3. Housing – it is vital that any housing development prioritise social housing available at social rents, not so-called "affordable" rents, which are close to market rents and beyond the reach of all but those on high incomes. (It is estimated an income of £50,000 is needed for the rent to be 'affordable' in London.) We therefore want the Neighbourhood Plan to commit to social rents and not 'affordable' housing. There are currently at least 25,000 people on Camden Council's housing waiting lists, and without a commitment to providing new homes at social rents, this will only get worse and promote social cleansing, the very opposite of what we understand the Neighbourhood Plan is meant to stand for.

Design Policies

Policy D1: The View of Parliament Hill

We very much agree with the inclusion of this policy in the Plan because we know how strongly local residents feel about protecting the openness of the environment surrounding Kentish Town Underground.

Getting Around Policies Policy GA: Step-Free Access

We are strongly in favour of step-free access in Kentish Town Stations and urge the whole plan to address disability access throughout the Kentish Town, whether it relates to streets, shopping facilities, buildings, green spaces etc.

Green & Open Spaces Policies

Policy GO1 Local Green Spaces and GO2 Open Spaces on Estates

This is a priority for us and we completely agree that any development which would reduce the amount of green and open space, including existing open spaces on council estates in Kentish Town, should not be allowed. We agree with the proposals under Green & Open Spaces Project.

Community & Culture Policies

Policy CC1 Statement of Community Consultation

We are concerned that public scrutiny and accountability be retained in the planning process. If we have understood correctly that the need for a planning applications to be submitted to the local authority has been removed, we are concerned that this will make it much harder for those most directly affected by any particular plan to object to planning applications. In the absence of the local authority's involvement, how the planning process will work, who exactly will be responsible, what checks are in place, how conservation standards will be upheld etc. need to be extremely carefully explained and closely monitored to ensure it works to the advantage of local communities living and working in the area.

Spatial Policies

Policy SSP4: Wolsey Mews

We agree with the proposals for Wolsey Mews, where we are based at No: 25. However we strongly urge the Neighbourhood Plan to be amended to include the pedestrianisation of Wolsey Mews, allowing access for deliveries to shops which back onto the Mews within restricted times, access to the disabled bay, and for visitors with walking difficulties to be dropped off for example at the Women's Centre. The Mews is dangerous for pedestrians, wheelchair users, children in buggies, mothers with small children, and cyclists because despite the street being so narrow and having a very narrow pavement on one side only, it is used by big delivery vehicles including articulated lorries, flouting the 7.5 tonne weight restriction, while other vehicles can travel at speed. Cars especially turn suddenly into the Mews, surprising people and giving little time to get out the way. What pavement exists is not wide enough to be safe. The Mews is already used as a rat-run including by cars travelling up the wrong way making it more dangerous. Banning traffic (except cycles) from the Mews, apart from the exceptions above, would be a significant improvement for the safety of those living and working in the Mews, and for those using it to reach other streets and local venues by foot or bicycle.

The pedestrians using the Mews are mainly mums and children going to and from the school in Islip Street, users of the Women's Centre and other people who live or work in any of the buildings on Wolsey Mews. Our users include wheelchair users and mothers with prams/buggies and small children, for whom the pavement is not wide enough, often forcing them to use the street. With the recent conversion of buildings into flats, more residents are living in the Mews, while more residential developments are planned. The problems of the Mews are therefore affecting more local people.

We do not think traffic (including bikes) should be encouraged to use the Mews as an alternative to Kentish Town Road. Promoting the use of Hammond Street instead would be much safer as the pavement and the road are much wider.

We opposed the introduction of the contra-flow cycle lane in the Mews, for reasons of safety, and do not want to see this retained in the Neighbourhood Plan as long as the Mews is open to

traffic. If traffic were banned, there could be a two-way cycle lane and cyclists could use the Mews as an alternative to Kentish Town Road. Currently, two-way traffic for cyclists increases the likelihood of mistakes being made, especially as vehicles don't always recognise the Mews as one-way. The sharp turn into the Mews from Islip Street may be dangerous for cyclists coming in the opposite direction. At the Mews junction with Caversham Road, motorists often reverse across the junction in order to park at the same time as cars are exiting the Mews. We have witnessed a number of collisions there.

We are in favour of more and safer cycle lanes and traffic light boxes on main roads throughout Kentish Town and in the borough generally, and this should be reflected in the Neighbourhood Plan. A number of our volunteers and users ride their bikes when they come to the Centre, so safety of cyclists is a major concern.

Policy SSP5 – 2 Prince of Wales Road We are very concerned that the Law Centre, CAB and the Volunteer Centre Camden (which now share this building), should remain in Kentish Town They are vital community resources which must not be lost as a consequence of the sale of the building which currently houses them [. We are aware that newly emerging and future grassroots community groups need permanent low rent premises; what is available now is very limited and only at commercial rents.

DARTMOUTH PARK NEIGHBOURHOOD FORUM COMMENTS ON KENTISH TOWN NEIGHBOURHOOD PLAN, SUBMISSION DRAFT

29 JANUARY 2016

We welcome the publication of the draft plan from one of our neighbouring Forums. A great deal of good work has clearly gone in to it and there is much to commend. We congratulate Kentish Town Neighbourhood Forum on reaching this milestone.

We will leave it to others to make general comments about the plan and limit ours to the policies where there is a <u>direct</u> impact on the Dartmouth Park neighbourhood plan area and our emerging plan. These are principally the areas where we share a boundary, most notably what the plan calls the Kentish Town Potential Development Area, which is split roughly half and half between the two neighbourhood plan areas. Our comments are made subject to finalising our own plan and related engagement.

Policy D1: The View of Parliament Hill

Our letter, included as an appendix to the Kentish Town draft plan, states that we agree in principle that the view from Kentish Town tube station to Parliament Hill should be protected. This remains our position. However, before offering our wholehearted support, we will need to understand the implications of the restrictions that the viewing cone would place on development in the part of it that is in the Dartmouth Park neighbourhood plan area. This is a policy where virtually all of the impact (assuming that the railway lines will not be built upon) will be felt in the Dartmouth Park plan area. As such, it would, for example, be useful to see some analysis on the maximum building heights that would result from implementing the policy.

As with other policies, the wording needs to be clearer so we can understand what it actually means. The phrase "subject to assessment of viability on proposals coming forward" needs to be defined. Does it mean that any scale and massing would be acceptable if the restrictions mean that no development stacks up financially?

Policy D2: Railway Land

This is an interesting proposal. Even if the railway is not rafted over, if the Murphy site is developed there should be some linkage between the Regis Road and Murphy sites, presumably by a simple bridge for pedestrian and cycle access.

Policy SP2: Kentish Town Potential Development Area

We support the principles reflected in this policy, and are pleased that the policy envisages no loss of employment floorspace. We specifically support the preparation of a Development Framework for the whole area and expect to play a full part in this.

It is not clear what the relationship is between the Kentish Town Industry Area and the Kentish Town Potential Development Area. Maybe the difference could be explained using a map.

Paragraph 3 on page 39 rightly states that the Highgate Road Section (as defined in this draft plan) is partly in our area. This is not an area that KTNF has discussed with us. A co-ordinated Development Framework could address this. Alternatively, the plan could define the Highgate Road Section so it only includes things in the Kentish Town area.

Policy SP2a: KTPDA – General Development Criteria:

We agree with the principles set out in these criteria (subject to our comments about testing policy D1), although we believe some could be developed in more detail (such as the facilities to be provided under paragraphs vii) and viii)). In paragraph xii), it is not clear what the 20% reduction is to be measured against. We intend to examine these criteria in more detail in the course of finalising our plan.

A major concern is that there is the potential for huge numbers of new dwellings and the plan does not really address the implications for the infrastructure in the area. Paragraph vi) says mitigation would be required re healthcare and education, but how is that to be determined? And what about the impact on transport (trains, underground and buses), all of which are already overcrowded? These would be significant factors to take into account in any planning application.

The first paragraph of the Reasoned Justification, p 44, is vague, e.g. 'limited in some circumstances' - these should be identified. In addition, the last 3 or 4 paragraphs seem to include new requirements that are not actually reflected in the policy, e.g. imposition of conditions to allow mixed use. These should be reflected in the actual policy, not in the justification.

From: Sent: To: Subject:

PlanningPolicy Kentish Town Neighbourhood Plan

Dear Sir or Madam,

I object to the proposal to create a Kentish Town Square. There is no problem with narrow pavements or problems at the crossroads or with Regis Road. Perhaps the bus stop by the car wash could be re located further south as this only occasionally gets busy, as the buses are frequent and passenger build up is rare. The square is certainly not going to be used by the community, a good example of this is the bottom end of Kelly Street, where not a single resident used the now removed circular bench which was generally used by drug dealers.

The proposal to extend the "square" to the west side of Kentish Town by constructing a raft over the railway line is, apart from being costly and incurring unnecessary use of materials and energy, would encourage widespread property development in an otherwise open, area with panoramic views from a wide range of perspectives. The KTNP drawing allows for a much reduced narrow perspective from one point only.

Furthermore I think that Regis Road industrial area should be left as an industrial area as any residential developments will impact on commercials rents, driving out businesses.



London Borough of Camden,

Judd Street,

London



Nathaniel Lichfield & Partners Planning. Design. Economics.

14 Regent's Wharf All Saints Street London N1 9RL

020 7837 4477 london@nlpplanning.com

nlpplanning.com

WC1H 9JE

Strategic Planning and Implementation Team,

By post and email: planningpolicy@camden.gov.uk

Date 29 January 2016 Our ref 14366/NT/JLa/10633896v3 Your ref

Dear Sir/Madam

Kentish Town Neighbourhood Plan Submission Consultation

We write on behalf of our client, Four Quarters (Ingestre Road) Developments Ltd ("Four Quarters"), in response to the above consultation.

Four Quarters supports the preparation of the Neighbourhood Plan and particularly its focus on the provision of much needed new housing in the area.

Core Objective 3 of the Neighbourhood Plan Proposal is to *"identify vacant and underused sites for the development of well-designed housing."* (p.14). We would like to take this opportunity to introduce the Kentish Town Neighbourhood Forum (KTNF) to our client's 0.2 ha site at **11-12 Ingestre Road**, on which they will be progressing plans for a residential development. The vacant (former LB Camden care home) site is located within the Ingestre Road Estate and is well served by public transport, with Tufnell Park underground station approximately 350m to the west. As such it is well suited to residential development. We have enclosed a site plan showing the extent of the site and the surrounding area.

Four Quarters acquired this site from the Council on 31 March 2015, following closure of the home in summer 2013, when residents moved to a new facility at Maitland Park. The Council has produced a Planning Statement for the site, which promotes residential development in line with Government and local planning policies requiring the optimal redevelopment of surplus public sector land for housing.

The proposals for development on site are still at the preliminary design phase. However, our client will ensure that the housing potential of this site is fully realised and any development would include appropriate and viable affordable housing provision.

Nathaniel Lichfield & Partners Limited 14 Regent's Wharf All Saints Street London N1 9RL Registered in England No. 2778116 Regulated by the RICS

Offices also in Bristol Cardiff Edinburgh Leeds Manchester Newcastle Thames Valley



Our client intends to submit a planning application later this year and looks forward to discussing the proposals with the Neighbourhood Forum as part of our engagement with the local community.

Please do not hesitate to contact me or my colleague Joe Larner if you would like to discuss this matter.



Enc.

Site Plan



From: Sent: To: Subject: MARK 23 January 2016 21:14 PlanningPolicy Kentish Town Neighbourhood Plan

I object to the plan on the basis that the Neighbourhood Forum is effectively dominated by a Caroline Hill who represents a pressure group rather than a community based organisation and I do not consider the Forum to be properly constituted nor to represent the views of the local community.

Mark Harwood

Sent from my iPad

From:	Headlam-Wells, Jenny (Councillor)
Sent:	21 January 2016 16:54
То:	PlanningPolicy
Subject:	The .Kentish Town Neighbourhoof Forum - Response to Consultation on the
-	Submission Plan

Dear Camden Planning,

I am the Councillor for the Kentish Town ward and I am pleased to respond to the consultation on the Kentish Town Neighbourhood Forum (KTNF) Submission Plan. I have been involved with the KTNF since its inception, and throughout I have been impressed with the enthusiasm and commitment of residents. The Chair, Caroline Hill, has provided outstanding leadership and commitment to the Forum, and this is shown in the Submission Plan. This is a highly professional set of documents, showing great thoroughness, and a particularly high level of consultation and interaction with the local community.

I wish the Kentish Town Neighbourhood Forum and its Submission Plan every success.

Regards

Jenny

Councillor Jenny Headlam-Wells Labour Councillor for Kentish Town Ward Chair of Children, Schools and Families Scrutiny Committee

T: 020 7974 5257/ 020 7974 2792 (Officer support) Email: jenny.headlam-wells@camden.gov.uk Member Services, London Borough of Camden, Town Hall, Judd Street, London WC1H 9JE

From:	Gregory, Andree <andree.gregory@highwaysengland.co.uk></andree.gregory@highwaysengland.co.uk>
Sent:	07 December 2015 13:03
То:	PlanningPolicy
Cc:	growthandplanning; 'transportplanning@dft.gsi.gov.uk'; M25 Planning
Subject:	Kentish Town Neighbourhood Plan

Consultation: Dear Sir/Madam,

Thank you for your e-mail dated 3 December 2015 inviting Highways England to be involved in the above consultation process.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We have reviewed the documents for this consultation and have no comments.

Thank you again for consulting with Highways England and we look forward to working with London's local authorities.

Sent on behalf of Stephen Hall (Asset Manager) at Highways England

Andree Gregory

Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ Web: <u>http://www.highways.gov.uk</u>

Highways England Company Limited | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ | Registered in England and Wales No. 9346363

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From:	PlanningPolicy
Sent:	03 December 2015 09:58
То:	Triggs, Andrew
Subject:	FW: Kentish Town Neighbourhood Plan - consultation



Dear Sir/Madam,

Before all else, congratulations and commendations to the Kentish Town Neighbourhood Forum Committee and all those who have assisted them in what has clearly been a mammoth task.

The Neighbourhood Plan contains a great many very good ideas, which if realised could be very positive for the Forum area. The two-stage public square idea is particularly impressive, as is the (start) of the north-south cycle route using Frideswide Place and Wolsey Mews.

There are, though, a few proposals/omissions that concern me (and inevitably it is unfortunately these points I focus on, rather than all the things I think are good in the Neighbourhood Plan):

(1) There is considerable focus on the addition of residential units, not just at the Regis Road and Murphy's sites but generally, yet no firm proposal in relation to an increase in school capacity. This omission troubles me greatly. Residential densities in Kentish Town are already high and existing infrastructure is at best under strain, in practice already over capacity. In particular, schools are already at or over capacity. But despite the amount of residential units the Neighbourhood Plan proposes to add there is no proposal/policy to increase school capacity. The former requires the latter, at the very least.

(2) Rafting. Two points:

(a) There seems to be a significant tension between the rafting-over suggested for the Gospel Oak-Camden Road railway line and the protection of the view west from Kentish Town Road towards Hampstead Heath (which protection I entirely support). I think rafting over any section that would impinge on that view should be precluded.

(b) I also consider that the Neighbourhood Plan should rule out rafting the 'other side' of Kentish Town Road (i.e. to the east), or at least rule out more than a very modest rafting sufficient to allow for the new station entrance and the cycle route down from/up to Leverton Street. The sense of openness when looking to that side of the railway bridge formed by Kentish Town Road is important, albeit not as important as the sense of openness when looking west. But it is also important that one does not feel 'underground' whilst waiting for a train/alighting and, further, I know that young children who like trains (so most young children) very much enjoy being able to look at the trains when their parents hold them up to see over the parapet to the back of the Canopy...

(3) I could find no mention of protection for the Forum as a live music venue. Live music venues of any size are becoming an increasing rarity in London, yet are vital to a healthy community and economy in so many ways. Have I missed something? I am sure the omission would not have been deliberate.

(4) The north-south cycle route down from/up to Leverton Street down as far as the bottom of Wolsey Mews looks a very good start, but (and again I may be missing something) surely there then needs to be a dedicated (separated) cycle route that continues all the way down to deposit cyclists on the (existing, and hopefully improved if the roadworks are anything to go by) cycle lane that starts at the top of Royal College Street?

Finally, apologies for not commenting in such detail on the Neighbourhood Plan before now. Huge thanks again to the Committee and all who have assisted.

Yours faithfully James Burton

From: Sent: To: Subject:

PlanningPolicy Kentish Town Neighbourhood Plan

I think this is an extremely well thought out plan and I generally support it and the policies in it.

In particular I fully support the CIL priority spending policies especially the allocation of monies to support making Kentish Town and Kentish Town West stations fully accessible.

I hope that the CIL spending priorities in the Plan are adopted by the Council as I believe was the intention of creating neighbourhood planning in the Localism Act. Anything that can be added to this draft plan to make sure that happens would be welcome.

John Nicholson



Sent from my iPad
Vickers, Ben

From: Sent: To: Subject:

PlanningPolicy Kentish Town Neighbourhood Plan

Dear Sir or Madam

I am writing to support those aspects of the Kentish Town Neighbourhood Plan that relate to permeability for pedestrians and cyclists through the Regis Road and Murphy's sites as and when they come up for re-development. This specifically is outlined in policies SP2 and SP2a on pages 40-45 of the submission plan.

In particular I would like to fully support the proposed access into and through the Regis Road site from the south, east and west and I encourage the construction of further permeability across the railway to the north into the Murphy's site if/when this area is developed. Regards

Jo Taylor

JO TAYLOR

Vickers, Ben

From: Sent: To: Subject:

28 January 2016 23:20 PlanningPolicy Kentish Town Neighbourhood Plan



To: the Planning Team

Kentish Town Neighbourhood Plan

I would like to make one comment on the Kentish Town Neighbourhood Plan, concerning Community & Culture Project 1: Public Toilets (p. 63).

The Council has recently proposed imposing fines on people who urinate in the street. I would suggest that this proposal underlines even more strongly the need to reinstate one or more public toilets in the Neighbourhood Area, as well as to reinstate the scheme for local businesses, including pubs and cafes, to make their facilities available to non-customers.

I think the Neighbourhood Plan is a very impressive, comprehensive and excellent document, which would contribute invaluably to the future development of Kentish Town. I very much hope that it will be approved and then put to a local referendum.

Rosemary Lewin Chair, Kelly Street Residents Association creating a better place



London Borough of Camden Forward Planning & Projects Our ref: NE/2007/102642/OR-20/PO1-L01

By email: planningpolicy@camden.gov.uk

Date: 10 December 2015

Dear Sir/Madam

Kentish Town Neighbourhood Plan

Thank you for consulting the Environment Agency on the Draft Neighbourhood Plan for Kentish Town.

We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.

Based on the environmental constraints within the area, we have no detailed comments to make in relation to your Plan at this stage. However together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning. This sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf.

If you have any queries regarding the information set out above, please contact us on the email address below.

Yours faithfully

Mrs Wioleta Osior Planning Advisor

Direct dial 020 30255620 Direct e-mail northlondonplanning@environment-agency.gov.uk



By email : Planningpolicy@camden.gov.uk

Telephone 020 7973 3717

Strategic Planning and Implementation Team London Borough of Camden

28 January 2016

Dear Camden Planning Policy Team

Kentish Town Neighbourhood Plan Proposal

Thank you for consulting Historic England in respect of the submitted Kentish Town Neighbourhood Plan proposal.

The Government through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012) has enabled local communities to take a more pro-active role in influencing how their neighbourhood is managed. The Regulations require Historic England, as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest to be affected by the Plan. As Historic England remit is advice on proposals affecting the historic environment our comments relate to the implications of the proposed boundary for designated and undesignated heritage assets.

Historic England provided comments to the Neighbourhood Forum on the Draft Plan and SEA on 13th April 2015. This document is included in the consultation statement which accompanies the proposed Plan, SEA and Environmental Statement. We do not therefore wish to make detailed comments regarding the Neighbourhood Plan. We can however offer the following comments in respect of the implications for the historic environment.

Main considerations

The draft Plan is detailed and has clearly been subject to detailed consultation and sets out a positive vision for the area. In our view it would potentially benefit from the following

revisions to help provide greater clarity to the policies. These are set out in more detail in the general comments section:



Historic England, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST Telephone 020 7973 3700 Facsimile 020 7973 3001 HistoricEngland.org.uk Please note that Historic England operates an access to information policy. Correspondence or information which you send us may therefore become publicly available.



The character of the neighbourhood area compasses a variety of built characters and functions. In our view, the Draft Plan would benefit from inclusion of a short character analysis of its component areas. Given the concerns about design quality and economic vibrancy it would be helpful to set out the contributions they make to local distinctiveness and help define how positive change can support the character of these areas. Whilst Camden's own guidance sets this out in detail for the conservation areas, significant parts of the plan area fall outside of these. This includes much of Kentish Town Road, the areas high street and its recognisable heart. Greater clarity in respect of the character and the relationship between character areas would help inform the design guidance, and provide more structure to the proposed plan.

The north and south "gateways" are currently neglected and would benefit greatly from identification of opportunities for enhancing local character and architectural quality in addition to commercial activity.

General comments

Our letter of 13th April, suggested minor alterations to improve clarity and highlighted the importance of the retail core of Kentish Town Road. The quality and scale of many of the retail buildings helps to create a strong sense of enclosure and defines the central character of the plan area. The majority of these buildings fall outside the conservation areas but nevertheless must be considered to contribute positively to local character. A significant number have been formally identified as such on Camden's local list. The NPPF sets out the contribution that the historic environment can make to local character and the desirability of new development making a positive contribution to character and place. As such it would be helpful to clearly define the character and contribution of this cohesive element of the proposed Plan area. This would add weight to the proposed design guidance and help inform new development and the topic related objectives.

The Draft Plan also identifies the importance for Kentish Town Road to remain a vibrant shopping street. A specific issue raised in the Draft Plan is the economic vulnerability of its northern and southern ends. In our letter, we drew attention to the strong sense of enclosure within the High Street. This extends as far south as Farrier Street and Hawley Road and is a feature of approaches from the north end of Kentish Town Road. These areas encompass some of the earlier surviving buildings in Kentish Town. Whilst many have suffered alterations these "gateways" are currently visually neglected and would benefit greatly from identification of opportunities for enhancing local character and architectural quality (in addition to commercial activity).

The document identifies CIL funding in relation to the shop-front project (page 11). The project (page 59) identifies policies for advertising and shutters and encourages implementation of existing policies and guidance but does not explain how this will form a specific project. It would be useful to better identify the parameters of the project and how this would be developed with CIL funds. Is this to be developed in conjunction with Camden's development control and planning teams? It may also be beneficial to



Historic England, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST Telephone 020 7973 3700 Facsimile 020 7973 3001 HistoricEngland.org.uk Please note that Historic England operates an access to information policy. Correspondence or information which you send us may therefore become publicly available.



acknowledge other potential funding sources such as GLA or HLF and consider exploring these options.

General Development Policies (pg. 21). In reference to major schemes requiring design review, this might benefit from clarification in respect of what constitutes "major", and that the design review is presumably Camden's Design Review (rather than Design Council/Cabe).

We welcome the inclusion of core objectives and policies in the introduction which helps make the document more navigable.

We note the inclusion of an SEA. In our view, the policies proposed, whilst having implications for the historic environment through the introduction of additional possible development sites, should help to secure sustainable development and should not lead specifically to harmful effects for the historic environment.

Conclusion

Historic England welcomes the proposed Kentish Town Neighbourhood Plan and the extensive work that has gone into its development. Our suggestions above are provided with the intention of ensuring the document provides a stronger vision for the plan area and its historic environment. If you wish to discuss any of the above issues please do not hesitate to contact me.

It must be noted that this advice does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment. We trust this advice is of assistance in the preparation of your scoping opinion.



Historic Places Adviser





Vickers, Ben

From:	
Sent:	
To:	
Subject:	

29 January 2016 01:44 PlanningPolicy KENTISH TOWN NEIGHBOURHOOD PLAN

I object to the proposal to create a Kentish Town Square. There is no problem with narrow pavements or problems at the crossroads or with Regis Road. Perhaps the bus stop by the car wash could be re located further south as this

only occasionally gets busy, as the buses are frequent and passenger build up is rare.

The square is certainly not going to be used by the community, a good example of this is the bottom end of Kelly

Street, where not a single resident used the now removed circular bench which was generally used by drug dealers.

The proposal to extend the "square" to the west side of Kentish Town by constructing a raft over the railway line

is, apart from being costly and incurring unnecessary use of materials and energy, would encourage widespread property

development in an otherwise open, area with panoramic views from a wide range of perspectives. The KTNP drawing allows for a much reduced narrow perspective from one point only.

Furthermore I think that Regis Road industrial area should be left as an industrial area as any residential developments will impact on

commercials rents, driving out businesses.

Cheers

Graeme

Vickers, Ben

From:	Consultations (MMO) < Consultations.MMO@marinemanagement.org.uk >
Sent:	08 December 2015 15:37
То:	PlanningPolicy
Subject:	Consultation response- PLEASE READ

Thank you for including the MMO in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Kind regards,

The Marine Management Organisation

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Activities taking place below the mean high water mark may require a <u>marine licence</u> in accordance with the <u>Marine and Coastal Access Act (MCAA) 2009</u>. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

Marine Planning

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material

consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our <u>Marine Information System</u>. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the <u>Marine Policy Statement</u> for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the <u>Marine and Coastal Access Act</u> and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our <u>online guidance</u> and the <u>Planning Advisory Service soundness self-assessment checklist</u>.

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response please email us at <u>consultations@marinemanagement.org.uk</u> or telephone us on 0300 123 1032.

Re: Kentish Town Neighbourhood Plan

Kentish Town Neighbourhood Forum has submitted their proposed Neighbourhood Plan to Camden Council, in accordance with the Neighbourhood Planning Regulations 2012.

We are consulting residents and interested stakeholders on this proposed Plan.

How does this affect me?

A Neighbourhood Plan is a statutory planning document setting out planning policies for the development and use of land in the area. The Plan sets out a range of policies on matters including design quality, enhancing Kentish Town Road and community engagement. It also proposes to designate 5 Local Green Spaces in the area. The Neighbourhood Plan, if approved, will be used, alongside council policies in making planning application decisions in the neighbourhood area.

To view the proposed Neighbourhood Plan (including a map showing the boundary for the Plan) and further information on how to respond to this consultation please go to: www.camden.gov.uk/neighbourhoodplanning

Hard copies of the Plan and documents are available to view at:

• 5 Pancras Square Library, London, N1C 4AG

Opening Hours: Mon - Sat 8am – 8pm and Sun 11am – 5pm)

• Kentish Town Library, 262-266 Kentish Town Road, NW5 2AA

Opening Hours: Mon - Thu 10am – 7pm, Fri 10am – 5pm, Sat 11 – 5pm

Comments must be received by **29 January 2016** by e-mail to <u>planningpolicy@camden.gov.uk</u> or by post to

Strategic Planning and Implementation Team London Borough of Camden Judd Street London WC1H 9JE

If you require additional information please contact the Strategic Planning and Implementation Team on 020 7974 8988.

This e-mail may contain information which is confidential, legally privileged and/or copyright protected. This e- mail is intended for the addressee only. If you receive this in error, please contact the sender and delete the material from your computer.

The Marine Management Organisation (MMO)

The information contained in this communication is intended for the named recipient(s) only. If you have received this message in error,

you are hereby notified that any disclosure, copying, distribution or taking action in reliance of the content is strictly prohibited and may

be unlawful.

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GREATER LONDON AUTHORITY

Development, Enterprise and Environment

Brian O'Donnell Strategic Planning & Implementation Manager Camden Council Town Hall Judd Street London WC1H 8ND Our ref:LDF06/LDD14/CG01Date:28 January 2016

Dear Brian,

Planning and Compulsory Purchase Act 2004 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012

Re: Kentish Town Neighbourhood Development Plan 2015-2030 -Submission

Thank you for consulting the Mayor of London on the Kentish Town Neighbourhood Development Plan 2015-2030 - Submission. As you are aware, all Local Development Plan Documents in London including neighbourhood plans have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraph 184 of the National Planning Policy Framework also requires neighbourhood plans to be in general conformity with the strategic policies of the Local Plan. The Local Plan for the Kentish Town Neighbourhood Area includes all the Development Plan Documents (DPD) adopted by Camden Council and the London Plan. The Mayor has delegated authority to me to respond and his representations are set out below. Representations from Transport for London, which I endorse, will be sent separately.

The Kentish Town Neighbourhood Forum has responded to a number of matters raised during the earlier consultation stage and it is my opinion that the Kentish Town Neighbourhood Plan is in general conformity with the London Plan. However, I set out below some suggestions and other representations to clarify and improve policy areas.

Kentish Town Industrial Area

The amendments to draft policy SP2a - KTPDA - General Development Criteria that aim to improve the industrial floorspace across the site are welcome. As set out in the Mayor's previous correspondence, inner London industrial sites serve a particularly important function for London's economy by providing sustainable distribution services for the Central Activities Zone. Some of these industrial uses may have low employment densities but provide vital services which support other businesses in London, many of which will have significantly higher employment densities. Camden Council's Kentish Town Regis Road Growth Area Employment Study demonstrates that the proposed KTPDA provides such a function.

As stated in the Mayor's previous correspondence, the Camden Core Strategy currently identifies this area as the Kentish Town Industrial Area, which is a locally significant industrial site in terms of

the London Plan. Camden propose to amend the designation of part of this area to enable mixed use development, led by the re-provision of industrial floorspace. The Mayor has made representations to the borough to ensure that the priority for any redevelopment should be replacement, and where appropriate, improved industrial floorspace.

To ensure that industrial uses can be retained and potentially expanded, any new development will need to ensure that new occupiers and land uses will be able to operate alongside the operations of industrial uses that may require 24 hour servicing, potentially by heavy vehicles. Ideally any redevelopment would still provide a buffer between noisy industrial uses and more sensitive residential uses to ensure the long term viability of these essential industrial uses.

Murphy Site

It is unclear what the status of this text is. It appears to propose a policy approach, but is not set out as a policy in the Neighbourhood Plan. The text should note that the current strategic and local evidence suggest that this site would still be required to provide industrial floorspace and therefore any redevelopment should provide industrial floorspace in line with an up to date industrial needs study. The approach set out in the Kentish Town Neighbourhood Plan could risk inflating land values based on unreasonable redevelopment expectations.

Energy

The Neighbourhood Plan should reflect that for major development policy 5.2 of the London Plan includes an overall carbon dioxide reduction target of 40 per cent beyond Building Regulations 2013, moving to 'zero carbon' for residential development in 2016 and non-residential development in 2019. This target is supported by the evidence produced for the Minor Alterations to the London Plan. In line with the Mayor's energy hierarchy, the contribution that renewable energy technologies make to this target should only be considered after improved energy efficiency and the potential to establish or connect to a nearby decentralised energy network.

If you would like to discuss any of my representations in more detail, please contact Celeste Giusti (020 7983 4811) who will be happy to discuss and arrange a meeting.

Yours sincerely,



Assistant Director – Planning

cc Andrew Dismore, London Assembly Constituency Member Nicky Gavron, Chair of London Assembly Planning Committee National Planning Casework Unit, DCLG Alex Williams, TfL DM/HM/TP DP

Strategic Planning and Implementation Team

London Borough of Camden Judd Street London WC1H 9JE

By Post and Email planningpolicy@camden.gov.uk

29th January 2016

Dear Sir / Madam

KENTISH TOWN NEIGHBOURHOOD PLAN: SUBMISSION VERSION CONSULTATION

REPRESENTATIONS ON BEHALF OF THE MURPHY GROUP

These representations are submitted to London Borough of Camden on behalf of our client the Murphy Group in respect of the draft Kentish Town Neighbourhood Plan ("KTNP") consultation. We have met with members of the Kentish Town Neighbourhood Forum to discuss our approach, notably the protected view of Parliament Hill.

1. Background

The Murphy Group own the freehold of a 6.8 hectare site off Highgate Road, Kentish Town ('the Site'). The Site is located a short distance west of Kentish Town Railway Station and Town Centre. It is currently located within a defined Industry Area, and occupied by the Murphy Group as their plant and transport depot. The Site represents a key regeneration opportunity in light of emerging policy for mixed use development in the Kentish Town area designated as a "potential for development/better use" within the KTNP. The Murphy Group will remain on the site in the medium term and continue operations which are essential for servicing all of their contracts across London.

Given the longer term regeneration and mixed-use redevelopment opportunities that are proposed by the Neighbourhood Forum in line with the draft Camden Local Plan, our client welcomes the publication of the latest draft KTNP and the opportunity to comment. Our client would like to make a number of specific comments on certain aspects of the draft document, which are set out below.

In the event the Inspector deems a public hearing necessary to test the soundness of the plan, our client wishes to note their intent and desire to attend and present their representations.



DP9 Ltd 100 Pall Mall London SW1Y 5NQ

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2. Representations



Draft Policy SW1: Supporting Small Business

The Murphy Group supports the principle of retaining and increasing floorspace available for the use of business, small or large. Drawing on the accompanying text to the draft policy, there is an unmet demand for employment premises within the KTNP area, an emerging hub providing work-space for start-up, micro and small business. However, it is unclear what the rationale is for a 232sq.m upper limit on business floorspace increases. We would suggest that the draft policy wording is amended to remove any specific floorspace limit, and focus on the provision and uplift in employment floorspace within Class B, irrespective of size. This use may impact successful 'co-working' B1 platforms that cater for small businesses as the size of their building may exceed 232sq.m. Indeed the opportunity for shared knowledge can be explored in such development.

The premise of this policy will also encourage and increase the emphasis on young and local people's access to employment opportunities.

Draft Policy D1: The View of Parliament Hill

The Murphy Group supports the principle of the uninterrupted view towards Parliament Hill from the area adjacent to Kentish Town Underground station and agrees this is required to be maintained, as far as possible.

Given the importance of the view and notwithstanding the above, we would suggest that the draft policy plan illustrating the Protected and Peripheral Corridors, should be reviewed in order to relate more accurately to what one actually sees from the proposed viewpoint. We agree any proposals must consider the view in terms of its "setting, scale and massing" however we are suggesting a tweak to the orientation of the view to protect the view of Parliament Hill. This includes the removal of the peripheral corridors which we consider are unnecessary. The remodelled views – prepared in a verified manner – are set out in the enclosed document, together with a commentary and explanation.

Draft Policy D2: Railway Lands

The Murphy Group supports the principle for future proposals of development that involve rafting over (decking over) the railway land from Gospel Oak to Kentish Town Station and from Kentish Town Station to Camden Road were this is feasible and practical. This would support the north to south connectivity of Kentish Town and allowing better access to public transport networks. We agree it is important to give consideration to the environmental, sustainable, and economical benefits, impacts and contributions of any proposals.

Draft Policy D3: Innovative Building Design

The Murphy Group supports the design principles and criterion which consist draft policy D3. There are examples of inappropriate development in Kentish Town which has left a legacy of

poorly designed frontages, which are out of keeping with the local area and have a negative impact on the visual amenity and sense of the area. The draft policy for modern innovative design is clearly necessary and consists of the same design parameters which are included within Camden policies CS14, supported by DP 24 and CPG1, and with Kentish Town Conservation Area Appraisal and Management Strategy (2011), Camden Streetscape Design Manual (2005), Town Centres SPG Greater London Authority July 2014, Shaping Neighbourhoods: character and context supplementary planning guidance GLA June 2014, Urban Design Compendium 2 – MADE.

Draft Policy D4: Non-Designated Heritage Assets

The Murphy Group supports the principle for the improvement and retention of buildings and features in the Kentish Town Area in the 2015 Local List. The Murphy Site have buildings which are designated on the Local List (ref:630) (however are outside of the KTNP boundary) as having 'Architectural and Townscape Significance' and are considered important elements to the local Kentish Town fabric and history and as such should be retained. These buildings are described in the Local List as follows;

'Ensemble of large red brick sheds at the corner of Sanderson close. Dating to the late 19th century these were the Kentish Town Locomotive Sheds for the Midland Railway, and sat just to the east of the Tottenham North and South Curves lines in an industrial landscape with other warehouses such as bottling stores at the end of Carkers Lane, and gas works. Rare evidence of the scale of the railway infrastructure in the borough in this period'.

Draft Policy GO3: Biodiverse Habitat

The Murphy Group supports the protection and encouragement of areas of biodiverse habitat and recognises the need to increase the biodiversity of green spaces. There are opportunities to increase and extend the biodiverse habitat along the existing green corridors (highlighted on page 30) and to strive to connect Hampstead Heath with pedestrian routes or nature trails (in accordance with policies GO3.1 and GO3.2).

Draft Policy CC1: Statement of Community Consultation.

The Murphy Group strongly supports the principle to actively engage in consultation with KTNF and the community as part of the design process prior to any planning application being submitted. Neighbourhood planning is a right for communities introduced through the Localism Act 2011 and is a vital element in the planning process. The consultation period allows local people to express their views on matters which relate to local issues and engagement in this process should always be encouraged.

Draft Policy SP2: Kentish Town Potential Development Area (KTPDA)

The Murphy Group strongly supports the principle of the KTPDA and recognition of its potential for mixed use development, whilst retaining and where possible increasing



employment opportunities. This general direction of travel accords with the draft Camden Local Plan (in particular, draft policies G1 and E2).

The Kentish Town area, and in particular Highgate Road, is well connected by a range of public transport modes, including rail and bus. Highgate Road and the overarching KTPDA represents a significant land holding in a sustainable location, well suited to mixed-use development of an appropriate scale to deliver new homes and economic development. The future of this part of Kentish Town, regenerated as a new mixed-use neighbourhood, is strongly supported by the Murphy Group. A mixed use development would bring forward the availability of affordable housing and local employment will be increased (in accordance with Spatial Policy 3).

The regular review of employment allocations and consideration of alternative land uses is advocated at national level, the NPPF stating:

"Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities." (Para. 22)

Whilst it is agreed that the promotion of an increase in industrial and residential floorspace is important within Kentish Town, the KTNP does recognise that there is a significant development opportunity in the KTPDA.

Notwithstanding the above, we would suggest that the draft policy wording refers to 'employment' rather than 'industrial' floorspace given that the latter can often be incompatible with other uses, such as residential, as part of mixed-use schemes. We would also suggest that the reference to a Development Framework is maintained, but flexibility added so that regeneration schemes that come forward in advance of such a Framework are not penalised, but treated positively if they are seen to respond to the emerging objectives and vision for the area.

The Murphy Group support the statement within the KTNP which states

"The local community has said that the Industry Area does not feel like part of Kentish Town and it wants to see a comprehensive and co-ordinated approach taken to the potential redevelopment of KTPDA".

We agree with this statement of the KTNP as there are increasing noise tensions of the Murphy Trucks impacting the surrounding uses and creating congestion in the road network. The industrial use of the site is not suited to its current location as B1 and C3 class uses would be.

Draft Policy SP2a: KTPDA – General Development Criteria



The Murphy Group supports the principle of general development criteria to inform and guide new proposals in the KTPDA. This provides greater certainty for developers and assists in the early stages of site appraisal and design work.

In accordance with our comments on draft policy SW1, we would suggest that reference to 'industrial floorspace' under SP2a)i) is replaced with 'employment floorspace' to ensure compatibility between land uses in future mixed-use schemes.

Housing for the growing population of elderly is noted as an important element of future development proposals in this area, and across the country. However, the wording of SP2a)v) should be amended so that such uses are 'supported' rather than 'included' in proposed development schemes. As currently drafted, the wording would seem to suggest that all development schemes should include a proportion of housing for the elderly, which clearly may not be appropriate, deliverable or viable depending on site-specific circumstances.

Appropriate levels of mitigation, related in scale and kind to proposed development, can be important aspects of bringing forward redevelopment proposals. To ensure compliance with relevant national and local legislation/policy, we suggest that SP2a)vi) specifically refers to mitigation outside of the remit of Community Infrastructure Levy Regulations, and in accordance with Camden's guidance on Planning Obligations.

The Murphy Group supports the redevelopment of the Murphy Site and agrees with the statement on page 44 of the KTNP which states

"proposals for its intensification of the use through additional mixed use development, including residential, offices and other uses, will be supported subject to having regard to the criteria in Policy SP2a. A mixed use approach to the development of the site, including residential buildings and incorporating active business and industrial uses, where appropriate, would be supported. This would intensify the use of the site and ensure the continuing viability of industrial uses".

The boundary of the Dartmouth Park Neighbourhood Forum (DPNF) divides the Murphy Site with the KTNF. The Memorandum of Understanding is strongly supported and the agreement that the promotion of designating the Murphy Site as a mixed use development is a joint up local approach which is encouraged through the Localism Act 2011.

Projects: Kentish Town Square Phase 2 – CIL Priority (plus Section 106 contributions)

The Murphy Group strongly supports the principle of forming new roads and pedestrian access to an enlarged Town Square in Kentish Town through may forms (including the existing railway structures). The "Green route to Hampstead Heath" is also a proposal the Murphy Group would welcome and support to increase linkages to other transport hubs whilst lessening the requirement for car usage between stations. This vision will promote and enable the delivery of integrated, accessible, sustainable transport solutions for the area. This is also in



accordance with Spatial Policy 7 b) with the promotion of the Murphy Site as a coordinated redevelopment of the KTPDA will provide an opportunity to *"include new pavements, street lighting, landscaping, green spaces and play areas, along with cycle and pedestrian routes"*.

3. Concluding Remarks

We trust that the above representations are clear and that they will be taken into account in the next stage of the KTNP. We also request that we are consulted on any future planning policy documents concerning the area, including Employment Land Reviews, or Development Framework (or similar).

If you require any additional information or would like to discuss this matter further then please do not hesitate to contact me or my colleagues Harry Manley or Thomas Price at this office.

Yours faithfully

David Morris Director DP9 Ltd

For and on behalf of DP9 Ltd

CC. Caroline Hill - KTNF

Kentish Town Neighbourhood Plan

Draft Policy D1: The View of Parliament Hill

Representations on Behalf of the Murphy Group

29th January 2016

Introduction

The Murphy Group owns the freehold of a 6.8 hectare site off Highgate Road, Kentish Town ('the Site'). The Site is located a short distance west of Kentish Town Railway Station and Town Centre.

It is currently located within a defined Industry Area, and occupied by the Murphy Group as their plant and transport depot and have been operating from the site for over 60 years.

The current operations on the site include Warehouse operations storage, fitters shop, spray shop, site accommodation refurbishment and carpentry shop. A large proportion of the northern part of the site is allocated for parking where approximately 200 employees/visitor's park. The site employees approximately 400 staff on site on a daily basis. We have liaised with the Kentish Town Neighbourhood Forum (KTNF) as we consider the Site represents a key regeneration opportunity in light of emerging policy for mixed use development in the Kentish Town area designated as a "potential for development/better use" within the Kentish Town Neighbourhood Plan (KTNP).

The KTNP has a number of draft policies which comprise a consultation document submitted to the Inspector for review.

The KTNP supports the redevelopment of the Murphy Site and page 44 of the document states the following;

"proposals for its intensification of the use through additional mixed use development, including residential, offices and other uses, will be supported subject to having regard to the criteria in Policy SP2a. A mixed use approach to the development of the site, including residential buildings and incorporating active business and industrial uses, where appropriate, would be supported. This would intensify the use of the site and ensure the continuing viability of industrial uses". Given the longer term regeneration and mixed-use redevelopment opportunities that are proposed by the KTNF in line with the draft Camden Local Plan, the Murphy Group welcomes the publication of the latest draft KTNP and wish to continue our engagement with the forum.









KTNF Proposed View Corridor

The Murphy Group supports Draft Policy D1 (The View of Parliament Hill) and the principle of the uninterrupted view towards Parliament Hill and agrees this is required to be maintained, as far as possible.

The draft policy D1 states;

'any development in the Kentish Town Area must not impede the uninterrupted view from any point immediately adjacent to Kentish Town Station and from any point immediately adjacent to the Kentish Town Square looking towards Parliament Hill and Hampstead Heath. This view is to be protected'.

The diagram illustrates the protected view, from a specific point adjacent to Kentish Town Station towards the crown of Parliament Hill. From the central line of view, a corridor of 2.5 degrees to either side is protected from all new development above the ridge of the building noted (on Murphy site). To each side of the main protected corridor, a further 2.5 degrees zone is defined, in which justification must be made for any new development above the previously noted ridge line.



KTNF Proposed View Corridor

This photograph show what one sees when looking along the proposed view corridor towards Parliament Hill from the proposed viewpoint.

The next page shows an enlarged section of this image.

The view toward the Heath cannot be described as of particularly good quality – you would be unlikely to stop to take a photograph of it, for example – because of the presence of highways clutter in the foreground and electric gantries running along the rail lines beyond the bridge.

However, the trees on Hampstead Heath can be seen clearly beyond all this, terminating the view above the rail bridge parapet.



GPS coordinates locating the Kentish Town view point and verified view camera position.



Verified view to Parliament Hill from Kentish Town view point.

What catches the eye most, and allows the viewer who knows the area to understand what they are looking it, is the large area of grass that is visible in the distance. It is particularly eye-catching when sunlight falls on it.

For the most part, the grass that is visible is on the slope that rises up above the Parliament Hill Fields athletics track. Above this and beyond an intervening line of trees, a much smaller band of the grassed area around the high point of Parliament Hill itself can be seen. Above this are more trees on the Heath, further to the north, rising up to the skyline of the view as seen from here.

As can be seen, the KTNF proposed view corridor is not centred on the visible area of grass, but is shifted to the right relative to the grass.



This shows a proposal to move the view corridor slightly to the left as seen from the viewpoint.

Proposed Adjustment of KTNF Protected View Corridor



Proposed Adjusted View Corridor

This shows the proposed new location of the view corridor, oriented more accurately on the grass in the distance.

This would have the effect that the view corridor would be centred more on what is most noteworthy and noticeable in the view of the Heath – that is, the grass. Proposed Alignment of Adjusted View Corridor



Neighbourhood Plan Proposed Diagram 1: Protected View

This shows the proposed realigned corridor in the context of the wider view.





GPS coordinates locating the Kentish Town view point and verified view camera position.

Verified view to Parliament Hill from Kentish Town view point illustrating the proposed alignment of adjusted view corridor.

Neighbourhood Plan Proposed Diagram 2: View Corridor

Given the importance of the view and notwithstanding the above, we would suggest that the draft policy plan illustrating the Protected and Peripheral Corridors, should be reviewed in order to relate more accurately to what one actually sees from the proposed viewpoint.

We agree any proposals must consider the view in terms of its "setting, scale and massing" however we are suggesting a tweak to the orientation of the view to protect the view of Parliament Hill. This includes the removal of the peripheral corridors which we consider unnecessary.



Neighbourhood Plan Proposed Diagram 3: Building Height

Although the building heights outside of the viewing corridor are not protected to the height of the existing building on the Murphy site, it is agreed that these building heights need to respect and are sensitive to development within the viewing corridor and the view itself to frame the view rather than enclose and overbear through surrounding overdevelopment.

The proposed building heights should gradually step up either side to a positon to be agreed during detailed design discussions. We do not consider prescriptive heights should be designated in the policy nor in or outside of the viewing corridor as limited design analysis has been undertaken to inform this.



*Maximum building height within view corridor is limited to ridge line of existing building identified on the above plan.



Verified view to Parliament Hill from Kentish Town view point illustrating the proposed alignment of adjusted view corridor.

Verified View Methodology

Project Methodology - Kentish Town

AVR London were commissioned to produce a verified view and 2D viewing cone from a key locations outside Kentish Town tube station. The position was identified on site by a representative from the architects.

2D plans, Ordnance Survey Mapping, local survey data were provided by Studio Egret West Architects, these were used by AVR London to verify the photograph and position.

Surveying

Control stations were established at the camera position and easily clearly identifiable static points within the view were identified by the chartered land surveyor on site and marked as an overlay on the photograph from that position.

The survey control stations are resected from the OS base mapping and wherever possible, linked together to form a survey network. This means that survey information is accurate to tolerances quoted by GPS survey methods in plan and commensurate with this in level.

Horizontal and vertical angle observations from the control stations allow the previously identified points within the view to be surveyed using line of sight surveying and the accurate coordination of these points determined using an intersection program, these points are then related back to the Ordnance Survey grid and provided in a spreadsheet format.

The required horizon line within the image is established using the horizontal collimation of the theodolite (set to 1.60m above the ground) to identify 3 or 4 features that fall along the horizon line.

Surveying equipment used:

Wild/Leica TC1000 electronic theodolite which has 3" angle measuring accuracy and 3mm + 2ppm distance accuracy. Wild/Leica NAK2 automatic level which a standard deviation of +/- 0.7mm/km

Photography

Each scene was photographed using a plumb line over a survey pin to accurately position the view location. The centre of the camera lens was positioned at a height of 1.60 metres above the ground to simulate average viewing height. The view was taken with a lens that gave approximately a 68 degree field of view, either in landscape or portrait format, a standard which has emerged for verified architectural photography. The nature of digital photography means that a record of the time and date of each photograph is embedded within the file; this metadata allows accurate lighting timings to be recreated within the computer model.

In professional architectural photography, having the camera horizontal is desirable in order to prevent any 3 point perspective being introduced to the image and ensure the verticals within the photographed scene remain parallel. Within architectural photography this is standard practice and more realistically reflects the viewing experience. The camera

Camera	Easting	Northing	Ground Level	Horizon Leve
1	529019.03	185166.07	37.18	38.78
			Town Railway	

Point	Easting	Northing	Level
101	528996.49	185169.58	44.29
102	528996.61	185172.99	50.78
103	528999.89	185172.46	37.07
104	528994.14	185177.19	42.42
105	529003.05	185174.81	37.34
106	529003.03	185174.82	41.00
107	528899.47	185227.46	43.88
108	528771.74	185311.03	48.95
109	528998.07	185179.79	37.57
110	528865.72	185277.40	45.88
111	528989.11	185190.27	39.29
112	529002.21	185180.32	41.29
113	529011.70	185173.19	37.26
114	529010.84	185174.26	41.03
115	528883.66	185311.10	56.08
116	528901.18	185329.60	58.01
117	528965.99	185251.89	53.90
118	528974.13	185257.17	53.83
119	528997.91	185204.70	38.68
120	528986.31	185308.39	54.28
121	529016.07	185174.91	37.28
122	529003.13	185215.70	39.80
123	528847.01	185281.02	43.93
124	528986.66	185185.93	39.28
125	528744.43	185377.01	45.90
126	529003.08	185176.46	37.43





AVR LONDON METHODOLOGY

١.

used by the photographer has the ability to shift the digital capture chip with respect to the centre of the camera lens, allowing for the horizon in the image to be above, below or centrally within the image whilst maintaining the parallel nature of verticals previously mentioned.

Using the surveyed horizon points as a guide, each photograph is checked and rotated, if necessary, in proprietary digital image manipulation software to ensure that the horizon line on the photograph is level and coincident with the information received from the surveyor. Using the coordinates provided by the surveyor along with the previously identified points within the scene the virtual camera was verified by matching the contextual surveyed points with matching points within the overlaid photograph.

Accurate Visual Representation Production Process

All information was precisely aligned to the OS coordinate grid system.

Within the 3D software a virtual camera was set up using the coordinates provided by the surveyor along with the previously identified points within the scene. The virtual camera was verified by matching the contextual surveyed points with matching points within the overlaid photograph. As all the surveyed points, virtual camera and 3D model all relate to the same 3-dimensional coordinate system then there is only one position, viewing direction and field of view where all these points coincide with the actual photograph from site. The virtual camera is now verified against the site photograph.

Notes

In order to produce the zone of importance marked on the photograph, a 3 dimensional shape was extruded from the 2D plan information, this was rendered with the virtual camera set up earlier and then overlaid on the verified photograph.

2

Vickers, Ben

From:	Behnke, Piotr (NE) <piotr.behnke@naturalengland.org.uk></piotr.behnke@naturalengland.org.uk>
Sent:	28 January 2016 16:41
To:	PlanningPolicy
Subject:	Natural England Response - Kentish Town Neighbourhood Plan - Proposed
Attachments:	Neighbourhood Plan consultation NE Feedback Form - 2015.pdf

FAO: Strategic Planning and Implementation Team,

Thank you for your correspondence in respect of the Kentish Town Neighbourhood Plan, this is much appreciated. Having taken a look at our previous comments and given the location of the plan in relation to designated sites Natural England wouldn't have any further comments to make above those already submitted in our previous consultation responses (up to and including that in April 2015). The Strategic Environmental Assessment (SEA) does cover the areas expected of it and as highlighted in our previous correspondence the main negative is the potential to deck over the old railway line which is identified as a detrimental option to biodiversity as the link provided by the railway corridor would be broken. Ideally this should be excluded as an option in order to ensure green chains and corridors are not damaged as part of the future plans for the neighbourhood area.

I trust that this is sufficient for your purposes, and thank you again for keeping Natural England advised as to the progress of the Kentish Town Neighbourhood Plan.

Regards,

Piotr Behnke Adviser Sustainable Development and Regulation Thames Valley Team

Natural England, Area 3A Nobel House, 17 Smith Square, London SW1P 3JR Tel: 0300 060 1963

www.gov.uk/natural-england

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We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

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These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

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Vickers, Ben

From: Sent: To: Subject: Attachments:

26 January 2016 13:06 PlanningPolicy FW: KTNF - Getting Around - Anglers Lane Pedestrianised Anglers Lane between Raglan Road and KT Road.jpg

Dear Planning Department,

RE: Kentish Town Neighbourhood Plan

As new and interested residents in Anglers Lane I would like to respond to the KTNF proposal listed below:

GETTING AROUND PROJECT 1: ANGLERS LANE

KTNF supports the introduction of significant traffic calming measures or revised routing to a known 'rat-run' in Anglers Lane. There will be thorough consultation with all residents, businesses and organisations in the KTNF Area.

We strongly urge the council to look at this problem. The narrow sections of Anglers Lane are simply inadequate to cope with the size and volume of traffic that use this road as a rat run.

We would like to ask the council to consider a pedestrianisation scheme for a section of the road - <u>to</u> <u>pedestrianise the one way section of the road</u>, <u>between the Raglan Road Junction and Kentish Town</u> <u>High Street</u>.

Attached is a quick photoshop sketch of how the new pedestrianised section might look.

Clear benefits of this pedestrianisation would be:

- Anglers Lane would cease to be a shortcut from Prince of Wales Road to Kentish Town Road.
- Car users in the area would still have good access to any of the neighbouring streets via Anglers Lane to and from Prince of Wales Road without having to negotiate lorries in a very narrow road.

- Anglers Lane would become a safe place to walk for the large number of families that use it to access Kentish Town High Street.
- The increasing number of residents on Anglers Lane (created by recent housing/flat development) would live in a safer traffic environment.
- The newly pedestrianised area would present an opportunity for a green space, including trees which would visually enhance the aspect from the Kentish Town High Street which has at present a very limited number of trees.
- Further enhancement to the look and feel of this section of Kentish Town High Street could come with the potential for pavement dining.

Yours sincerely

Simon and Susan Page

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Vickers, Ben

From: Sent: To: Subject:

26 January 2016 16:06 PlanningPolicy Kentish Town Neighbourhood Plan

On 23.4.15 I sent my comments on the draft Neighbourhood Plan. I have now looked at the Proposed Neighbourhood Plan and think the Committee have done an admirable job. However, I would like to make the following comments.

My husband and I came to Camden as a hard-up young couple 1961. Of course it was very dilapidated from wartime and needed to be revived.,but it was full of character, (and wonderful characters!) What happened? All its special character was removed and all its really useful shops, with the result that the High Street is virtually a "no-go" area for its longtime residents. In this splendid decision to make Kentish Town the agreeable place it can and should be, please consider what the longtime residents might like and, furthermore, need, rather than trying to attract visitors. I can promise the Planning Team we locals can keep the area alive and well if you take the trouble to find out needs and tastes! I have omitted to mention that we moved to Kentish Town in 1998, so have long experience of life in both areas.

Rosemary White (

Sent from my iPad

Planning Consultants

PT / DPNF

29th January 2016

Strategic Planning and Implementation Team London Borough of Camden Judd Street London WC1H 9JE

BY EMAIL

Dear Sir / Madam,

DP9 Ltd 100 Pall Mall London SW1Y 5NQ

Registered No. 05092507

telephone 020 7004 1700 facsimile 020 7004 1790

www.dp9.co.uk

KENTISH TOWN NEIGHBOURHOOD PLAN (NOVEMBER 2015 SUBMISSION VERSION).

We are instructed by Spring Place Limited ("SPL"), the owners of 3-6 Spring Place, Kentish Town ("the Site"), to submit representations in relation to the Kentish Town Neighbourhood Plan ("Neighbourhood Plan") Draft Submission Consultation (November 2015).

SPL are being advised by Brockton Capital, and this opportunity is part of a wider co-working platform in Camden and neighbouring Boroughs SPL are developing proposals for the redevelopment of the Site with a planning application due to be submitted later in 2016. The Site is located within the designated Neighbourhood Area and the emerging Neighbourhood Plan will therefore provide certainty and clarity in terms of the delivery of a redevelopment scheme and, as a result, we consider it important that this opportunity to comment on the draft Neighbourhood Plan is taken.

By way of background, Brockton Capital specialise in the delivery of modern, flexible and adaptable workspaces that focus on and prioritise the development of community and collaboration. They seek to create spaces that appeal to all shapes and sizes from start-ups to microbusinesses, to SMEs and larger companies. SPL are looking to redevelop the Site and deliver a coworking office building, providing a cost effective, flexible, accessible and collaborative work environment targeted at local companies and those wishing to locate in the Kentish Town area.

To facilitate the timely adoption of the Neighbourhood Plan and the certainty and clarity that this will provide, SPL seeks to ensure that the Neighbourhood Plan meets the 'Basic Conditions', as set out in Planning Practice Guidance ("PPG"), in order to proceed to referendum. The following comments are set against this background and the Neighbourhood Plan's performance against the Basic Conditions. In preparing this representation, we have reviewed the draft Neighbourhood Plan as well as the supporting Basic Conditions Statements and Strategic Environmental Assessment.

General Comments

SPL welcomes the publication of the draft Neighbourhood Plan and the general support it provides for investment in and the enhancement of the Kentish Town area, as part of the Vision that *"Kentish Town has the potential to be a fantastic place to live and work, full of well-preserved*





heritage, galleries, pubs, restaurants, music venues, shops and thriving businesses" (p.12). This is considered to be consistent with the ambitions of SPL, and their advisers Brockton Capital, in terms of investment in Kentish Town and specifically the redevelopment of the Site.

In order to bring forward a scheme on the Site, SPL support the adoption of the Neighbourhood Plan to provide a clear framework for proposals to be determined against, as part of London Borough of Camden's ('LBC') Development Plan. For the Neighbourhood Plan to progress from Examination to Referendum and then Adoption, it must meet the relevant Basic Conditions set out in PPG (Paragraph: 065 Reference ID: 41-065-20140306) and summarised below:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development; and
- be in general conformity with the strategic policies contained in the development plan for the area of the authority.

With regard to the Basic Conditions criteria we make the following comments on specific policies in the draft Neighbourhood Plan, where relevant to SPL and the proposed redevelopment of the Site.

Policies SP2 / SP2a

Regard to national policies

Draft Policy SP2 recognises the distinct potential of the Kentish Town Potential Development Area ('KTPDA') for mixed use redevelopment, with Draft Policy SP2a setting out general development criteria against which a development proposal(s) should be assessed. The KTPDA relates to a confined area comprising of just 3 parcels of land (Regis Road Site, Murphy Site and Highgate Road Section), capable of being delivered as part of a coordinated scheme in accordance with a Development Framework (as required under Draft Policy SP2).

Referring to the map on p.4 of the draft Neighbourhood Plan, 3-6 Spring Place is located outside, albeit adjacent to, the designated KTPDA. It is one of a number of smaller sites that are considered to have the same potential for mixed use development as these 3 larger sites forming the KTPDA, but which are located outside of the KTPDA boundary as drawn in the draft Neighbourhood Plan.

The NPPF is clear that as one the Government's 'core planning principles', Neighbourhood Plans should set out "a positive vision for the future of the area ... [and] ... provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency" (paragraph 17). Indeed, the principal use of Neighbourhood Plans is stated as being to "set planning policies ... to determine decisions on planning applications" (paragraph 183).

Draft Neighbourhood Plan Policies SP2 and SP2a fail to provide a clear framework for making decisions on planning applications relating to sites outside of the KTPDA but with similar characteristics and development potential as these sites. As a result, the Neighbourhood Plan is not considered to have clear regard to national policies.

Achievement of sustainable development

In relation to the contribution of Draft Policies SP2 and SP2a to the achievement of sustainable development, the NPPF defines the 'economic role' of sustainable development as "contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements" (paragraph 4). In terms of plan making, this is translated as meaning that "local planning authorities should positively seek opportunities to meet the development needs of their area" (paragraph 14).

Table 2 of the Basic Conditions Statement 1 (November 2015) states that the draft Neighbourhood Plan performs excellently in terms of encouraging and accommodating sustainable economic growth and employment opportunities as it "sets the conditions for new investment, businesses and employment". Similarly, the Plan is concluded as performing excellently by ensuring that new development makes efficient use of land, buildings and infrastructure, "particularly in the Kentish Town Industrial Area, The Murphy Site and The Railway Lands – that meets a range of needs". As discussed previously, the absence of key sites outside of the KTPDA, such as 3 – 6 Spring Place, brings into question whether important opportunities have been overlooked.

It is considered that the Neighbourhood Plan, as currently drafted, fails to contribute fully to the achievement of sustainable development in so far as it overlooks the potential of 3-6 Spring Place (and similar sites / land outside of the defined KTPDA) to support growth in the wider area.

General conformity with strategic development plan policies

Notwithstanding the above comments, it is considered that the draft Policies SP2 and SP2a are in general conformity with the strategic polices of the Core Strategy. However, referring to Table 3 of the Basic Conditions Statement 1 (November 2015), the Neighbourhood Plan policies are incorrect in so far as they do not relate to the current policy references. To avoid confusion at Examination, it is considered prudent to amend this supporting document to reflect the current policy references in the Neighbourhood Plan.

Recommended Changes to the Neighbourhood Plan (Submission Version)

To meet the Basic Conditions for Neighbourhood Plans, specifically in relation to the need to have regard to national policy and the contribution of the achievement of sustainable development, we propose the following focussed changes to the Kentish Town Neighbourhood Plan:

- That the KTPDA boundary be extended to include 3 6 Spring Place, to ensure that regard is had to national policy in terms of the role of Neighbourhood Plans in determining planning applications and reflecting the potential of the Site to achieve sustainable economic development in accordance with national policy.
- That Policy SP2a (point i) be amended to state that the requirement to maintain or increase existing industrial floorspace relates only to the development of KTPDA sites within the Kentish Town Industrial Area, as per Development Policies DPD Policy DP13. This is to ensure that regard is had to national policy in terms of the role of Neighbourhood Plans in decision taking.

It is also suggested that Table 3 of Basic Conditions Statement 1 is amended to ensure accuracy and transparency at Examination.

We trust that these comments will be taken into account, and confirm that we would wish to reserve the right to appear at Examination and to expand upon these representations in due course. We would be pleased to discuss this representation and any of our comments further and if this is the case, please do not hesitate to contact David Morris or Peter Twemlow.

Yours faithfully

P.P

D

Strategic Planning & Implementation Team Camden Council Town Hall Judd Street London WC1H 8ND Brunel Planning 51 Queens Road Tunbridge Wells Kent TN4 9LZ Tel: +44 (0) 7771 898315 www.brunelplanning.co.uk

roryjoyce@brunelplanning.co.uk

For the attention of: <u>planningpolicy@camden.gov.uk</u> Brian O'Donnell – Strategic Planning and Implementation Manager

26 January 2016

Dear Sir

Kentish Town Neighbourhood Plan - Regis Road Growth Area Consultation

We write on behalf of the Regis Road Landowners Association, to express our support for the emerging regeneration proposals in the Kentish Town Neighbourhood Plan.

As you will know, the Regis Road Landowners Association is made up of a number of freehold landowners who together own a significant proportion of the Regis Road Industrial Area, and large blocks of adjoining land and properties fronting Kentish Town Road.

For your information, a list of the members of the Association is appended at the end of this letter.

The Landowners Association is united in its support for these growth and regeneration proposals, and has agreed to work together to help the Council and Neighbourhood Forum to bring about this vision.

The Association has been following the evolution of the regeneration proposals for this area with great interest, and is keen to be consulted and remain involved in the emerging Local Plan and the emerging Neighbourhood Plan.

We formally register our broad support for the objectives of the Neighbourhood Plan as far as they relate to the regeneration and redevelopment of the Regis Road Industrial Area. Specifically we support the proposed identification of the Regis Road Area as an area with 'potential for development/better use' insofar as this accords with the Council's emerging regeneration proposals for this area, as set out in the emerging Local Plan.

Brunel Planning

At an appropriate time, the Association would welcome the opportunity to meet with the Council, and the Neighbourhood Forum to take this matter forward.

For your convenience we have also sent a copy of this letter directly to:

Councillor Sarah Hayward Councillor Phil Jones Mike Cooke

If you have any questions on any of the points raised in this letter, please do not hesitate to contact us at <u>roryjoyce@brunelplanning.co.uk</u> or on 07771 898315.

Yours faithfully

Rory Joyce Brunel Planning

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Appendix 1

Regis Road Owners Association

The members of the Regis Road Owners Association comprise:

Angelana Investments Ltd Asphaltic Developments Ltd – Retirement Benefit Scheme Bideford Ventures (UK) Ltd Caraselle Direct Ltd Create REIT Ltd Daymar Ltd Eko Ltd Fairfax Meadow Ltd John Mills Limited Peter Regis & John MacCarthy Peter Regis & The Spread Trustee Co Ltd Regis Road Management Ltd Spire Automotive Ltd

Vickers, Ben

From: Sent: To: Subject: Attachments:

07 December 2015 19:32 PlanningPolicy Kentish Town Neighbourhood Plan SouthKentishTownRoad-6.pdf; 1DraftRochesterCAStatement.pdf

Dear Sirs

I am writing on behalf of Rochester conservation area, with an interest in the 'south' Kentish town road.

We consider the area of considerable conservation importance, and have developed a proposal to include it within Rochester conservation area.

I attach a statement of characteristics from the planning perspective, and our current draft revised conservation area statement.

This should be entirely compatible with the broad approach taken by the KTNF plan, and I therefore propose support for the plan.

Yours Mark McCarthy

Rochester Conservation Area Draft Appraisal and Management Statement 2015



John Wilmot, 2nd Earl of Rochester (1647-1680): courtier and poet in the restoration period of Charles II

Preface

The London Borough of Camden (LBC) recommends regular review of conservation area statements. In 2013 LBC invited conservation areas across the borough, including Rochester and Jeffreys, to participate in updating their conservation area statements.

Camden provides guidance on the structure and content for the conservation area statement. Digital format offers a wider range of information to be recorded. This document is therefore kept relatively short, but provided with accompanying appendices, and potentially electronic links.

1. Boundaries

Rochester Conservation Area was created, with a second sub-area of Jeffreys Conservation Area, in 2001, and the Conservation Area Statement was adopted in 2002. Camden Broadway created in 2007. Local listing was introduced in 2012.

There are longer-established conservation areas to the north – Kelly Street, Bartholomew and Camden Square – and Regents Canal forms a southern boundary.

For the present Rochester statement, the boundaries are extended to include areas adjacent to Camden Road, St Pancras Way and Kentish Town Road (including Grade II listed properties).

This seeks to create a more coherent planning area for north Camden Town including Rochester, Jeffreys and Camden Broadway together,



2. Economy

Camden's local development is driven by private funds. The character of Rochester area, however, is balanced between residential (owner-occupied, private rented and social housing) and commercial (retail, office and light industrial) uses. While Camden Town and Kentish Town are both identified as 'town centres' in Camden's Local Plan, the economy and Neighbourhood Centre around Camden Road has received insufficient recognition. Use – and change of use – has important effects, relevant for the conservation area, on both local character and the local economy.

3. **Community engagement**

Camden has a developing policy for community engagement, including revising planning consultation. The present statement is built on experience of planning issues in Rochester since 2002. The three conservation areas cover parts of three wards (Cantelowes, Camden Town/Primrose Hill, and SommersTown/St Pancras) – but not the 'political' centre for any of these: it is necessary for Councillors to work together where neighbourhoods across boundaries.

Moreover, in using this conservation area statement, Camden's planning officers will need to ensure full dialogue on both applications and enforcement, and Councillors must be able to discuss all local planning proposals and represent conservation area interests, even at the same time as being members of the Development Control committee.

Rochester Conservation Area Draft Appraisal and Management Strategy November 2015

APPRAISAL Section

Introduction



Rochester Conservation Area lies in North Camden Town, bordering Kentish Town, with York Way to the east and Chalk Farm to the west. The spine of the conservation area is St Pancras Way, which since mediaeval times has run from the City of London on the east side of the Fleet River and joins the road from Westminster up to Kentish Town and onwards to Highgate. The land was laid out for housing during the first half of the nineteenth century, and has since developed commercial as well as residential use.

The London Borough of Camden introduced conservation areas in the 1970s, and now has 40 areas covering more than two-thirds of the urban land of the borough. Rochester conservation area was created in December 2001, at the same time as the neighbouring sub-area of Jeffreys conservation area. LB Camden encouraged creation of a 'South Kentish Town' conservation area advisory committee jointly between Rochester and Jeffreys conservation areas. A further conservation area for Camden Broadway was created in 2007.

The three conservation areas have common interest in North Camden, which lies east-west between Camden Town and Kentish Town. With the development of fullyelectronic planning records it is possible to be regularly informed on planning applications for the area. This revision of Rochester conservation area statement includes areas of North Camden contiguous with the Jeffreys and Camden Broadway conservation areas.

The statement is both an appraisal of the current condition of the area and guide on key issues and opportunities for enhancement. It is provided as a short overview document with greater, significant detail in appendices. It is for use by residents and, community groups to record their area; for businesses, developers and their professional advisers in preparing planning applications for proposed developments within conservation areas; and for LB Camden in the assessment of planning applications and scheduling highway maintenance and public realm improvement works.

Location



Neighbouring conservation areas



Proposed Rochester 2016

Rochester Conservation Area lies along the axis of St Pancras Way between Camden Town and Kentish Town, adjacent to Jeffreys and Camden Broadway conservation areas. Rochester has three sub- areas – Camden Road, St Pancras Way and Kentish Town Road.

Explanation / Assessment of special interest

Rochester lies between St Pancras and Kentish Town. St Pancras Way follows the north east bank of the River Fleet around the site of former Cantelowes Manor, while Kentish Town Road runs from Camden Town, crossing the Fleet at (now) College Gardens to meet St Pancras Way at the entrance to Kentish Town. The streets and housing were set out in the first half of the nineteenth century. Transport access – the Regents Canal and the North London Railway – increased land use for light industry, with significant developments including Hilger's optical instruments and Idris soft drinks company. Small firms, including coach-builders and garages, were built on the mew sites. Redevelopment of housing started with the award-winning St Pancras Way estate in the 1950s. Having escaped demolition for the Inner Ring motorway (a major interchange was projected at Kentish Town Road), the last 60 years has seen both preservation of Regency and Victorian houses and also new terrace and mansion blocks and architect-led mews conversions.

Substantial pressure for development continues. With several adjacent conservation areas, the new Rochester Conservation Area Statement provides an improved basis for planning decisions in their historical and architectural context.



Topography

The area slopes downwards from north east to south west, towards the River Fleet (now in a culvert). The Fleet crosses beneath Kentish Town Road at College Gardens and runs southeast to St Pancras (all culverted). Gravel from the banks of the Fleet have archaeological interest, as they reveal remains from Palaeolithic times. The Fleet also impacts on Camden's Flooding map, with particular concern for basements.



St Pancras Way runs from St Pancras uphill on the right bank of the Fleet, entering the Conservation Area to the south east and passing on the level northwest to Kentish Town. Kentish Town Road runs south to Camden Town, while the 'new' (1826) turnpike, Camden Road, runs north east from Camden Town across Royal College Street and St Pancras Way up to the hill crest at York Way.

Morphology

The conservation area is demarcated on four sides:

The northern boundary was originally a hedgerow from enclosure, and a boundary between land held by the Marquis of Camden to the south (developed from the 1820s) and the land held by St Bartholomew's Hospital (developed from the 1860s). Because the land owners could not agree with each other during the later period of development, there is no linking road: Bartholomew Road is entered either from Kentish Town Road or from Sandall Road higher up Camden Road.

The separation of North Camden Town from Kentish Town is perpetuated in the post district (NW1), and Camden Parking Zone (CA-G).



The entry of St Pancras Way to the Conservation Area at the southeast side is at the North London Railway bridge. At this point, St Pancras Way flattens and makes a

leftward turn, where a farm and possibly Cantelowes Manor once stood. The North London Railway passes on a series of viaduct and bridges from St Pancras Way, across Royal College Street, Camden Road and College Street to Kentish Town Road. The western boundary at Kentish Town Road is formed by the Fleet running behind the terraces on the west side.

Geology.

The British Geology Survey identifies the bedrock as London Clay formation ("Clay, silt and sand: sedimentary bedrock formed approximately 34 to 56 million years ago in the Palaeogene Period"). There is a lack of geological substrata information for the Conservation Area.

The Survey records one borehole, probably pre-war, at Whitcher Place, to a depth of 120 feet. It hows clay at superficial level. However, of six boreholes were made in 1965 at 25-27 Camden Road, on the corner with Camden Street, and also the point where the culverted Fleet sewer crosses beneath. Three of six of these boreholes show gravel for a metre below made ground, the other three record silty clay. The gravel deposits indicate the banks of the Fleet.

Archeology

The Thames valley has had human habitation for 40 000 years. An 1891 find of fossils (now in the Natural History Museum) at Brecknock Crescent shows that the land around the Fleet River was a grazing ground for large animals in the last interglacial period. Palaeolithic human artefacts (stone instruments) have been found in similar gravels in Holborn and at Trafalgar Square, indicating the possibility of early human hunting at north Camden – of concern for developments undertaking basement excavation.

The settlement near Old St Pancras Church at Brill Place dates possibly from Roman times. In the middle ages the population at St Pancras decreased, and moved to the higher land up the River Fleet at Kentish Town, although continuing to use the church at St Pancras. The road between, called the Kings Road until renamed (in 1939) St Pancras Way, led from the City of London through St Pancras to Kentish Town, and then upwards to the limit of the St Pancras Ward at Highgate. The road north from Westminster through Tottenham Court led up to Hampstead, with a linking road to Kentish Town at the confluence of the two River Fleet tributaries.

History

Rochester, Jeffreys and Camden Broadway Conservation Areas (2001) cover northern parts of land, originally around the Manor of Cantelowes, that was developed by the Earls of Camden.



During the eighteenth century, parishes took over powers previously held by Lords of the Manor. St Pancras parish stretched from St Giles in London to the hills of Highgate. The map of the parish of St Pancras (while incorporating some anachronistic aspects, such as Camden Road and railway lines up to 1870, but not the 1820 Regents Canal) shows

- the Demesne Land of Cantelowes, with the possible site of the Manor at the corner junction with a road across to York Way to the east

- to the west, the River Fleet and property of Tottenhall Manor / Earls of Southampton

- to the north, the field boundary separating the St Bartholomew's Hospital land from Cantelowes



William Camden was an Elizabethan historian and antiquary, who moved from London to Chislehurst in Kent in 1609, and his house was called Camden Place.¹ Later Charles Pratt (1713-1794), a lawyer and Whig politician during the reign of King George III, lived there, and employed Charles Dance (architect of the

Guildhall) in extending the building.

¹ http://camden-place.co.uk/index.php?p=172&pp=165&title=History



Charles Pratt, a lawyer and politician, was created the first Earl of Camden in 1765. He married Elizabeth, daughter of Nicholas Jeffreys (of Brecknockshire in Wales),² whose family owned the Cantelowes land. From 1788 Lord Camden started development of the fields to the east of what is now Camden High Street.

The earliest Camden Town streets were to the south, but from 1800s there were terraces built south of Kentish Town Road, including Jeffreys Terrace and Camden Terrace (now Grade II listed).



South Kentish Town map, 1809 (Crace Collection) (The double line at the bottom is the tentative Regent's Canal extension)

The farm at the corner of St Pancras Road, with Mr Agar's estate opposite, while at the northern end was the Nags Head and entrance to Kentish Town.



St Pancras Way views to southeast and northwest.

² http://www.cracroftspeerage.co.uk/online/content/camden1812.htm



Great College Street, built in stages from the Veterinary College by old St Pancras Church, joined Kentish Town along a former pathway (see map, 1809). Following construction of the Regent's Canal, a 'new road from Marylebone to Holloway' (now Camden Road) was built to the north-east. From 1820s, Camden Cottages were set out spaciously either side of Camden Road along St Pancras Way.

Greenwood map 1828 (Crace Collection)



Cruickshank's famous 'March of Bricks and Mortar'³ (1829) looks north from St Pancras Village. It shows bricks from Camden Town clay being hurtled over the River Fleet, with higher ground of North Camden behind, a signpost (pointing up Camden Road) and the hills of Hampstead in the distance.

³ http://www.museumoflondonprints.com/image/68302/george-cruikshank-london-going-out-of-townor-the-march-of-bricks-and-mortar-1829



The third Earl of Camden, George Pratt, was a Tory politician, and in the year he entered the House of Lords (1835) married Harriet Murray (1813–1854), daughter of the Bishop of Rochester. Camden Villas were built along Camden Road.



The first road developed on the east side St Pancras Way parallel to Camden Road was Wilmot Place. John Wilmot, the second Earl of Rochester, was a famous courtier, poet and libertine in the restoration period. He died heirless in 1689 and had little contact with the town of Rochester itself⁴. However, his wife had been a Lady of the Bedchamber, and so also became Elizabeth Murray: perhaps the name of Wilmot suggested royal connection for the Murray family.

Rochester Road was set out along the boundary of the Jeffreys land. Land to the north was owned by St Bartholomew's Hospital, which was set out as an estate from 1860s, but without any through-link to Rochester Road. Three small open areas were set out – in sequence, Camden Gardens, College Gardens and finally Rochester Terrace Gardens – linked across St Pancras Way by Jeffreys Street and Wilmot Place. Rochester Terrace Gardens complemented Rochester Square on the east side of Camden Road.

⁴ Alexander Larman. Blazing star: the life and times of John Wilmot, Earl of Rochester. Head of Zeus, 2014.

In the 1840s, the North London Line was built through north Camden Town, connecting the docks with Paddington basin, as Regents Canal had similarly been built in the 1810s. Some houses within the terraces were demolished. By 1870, the railway was widened to four tracks for passenger travel, and with a set of wrought iron bridges and brick viaducts.

Public houses were built at the ends of terraces along Kentish Town Road in the 1850s, and houses on main roads were converted to shops at the ground level to serve the growing population. In the later nineteenth century St Pancras Vestry, which was responsible for St Pancras Workhouse, was one of the slowest London boroughs in acting to improve housing⁵. The 'old' buildings around the Black Horse pub were rebuilt privately with 'model' tenements in the 1880s. A terrace at the junction to Kentish Town was to build St Barnabas Church (now St Andrews, Grade II listed).).

In the early 1900s, the extension of the Underground Railway from Camden Town to Kentish Town included a station at South Kentish Town, but this closed in 1924 for lack of passenger use. Trams and the Northern line underground at South Kentish Town station increased public transport locally. However gas, electricity and plumbing had to be installed into the older housing: for many Victorian houses, the small back extension had been the only toilet.



Bombsight map – (not fully accurate siting)

North Camden suffered nine bomb hits in the early WW2 blitz⁶, although no V2 bombs fell in Camden⁷. After the war, St Pancras was a leading borough in new building through compulsory purchase of land, particularly the Victorian terraces. St Pancras Way estate was its vanguard scheme (started 1948), followed by other

⁵ Stephen W Job, *Cat's Meat Square.* Housing and Public Health in South St Pancras 1810-1910. Camden History Society, 2012.

⁶ http://bombsight.org/explore/greater-london/camden/

⁷ <u>http://www.express.co.uk/news/uk/509301/Interactive-map-reveals-where-Hitler-s-feared-V2-bombs-landed-in-London-and-the-south-east</u>

large rebuilding nearby including Castlehaven Estate (LCC, 1950s), Agar Grove Estate (1960s, now being again demolished), and Maiden Lane Estate (1980s).

The row of Camden Cottages on the south side suffered bomb damage, and became the site for the first post-war housing building for St Pancras Council. The St Pancras Way Estate flats, on the north east and southwest sides of the Camden Road / St Pancras Road junction were locally listed in 2015





Building Hogarth Court, 1950Ordnance Survey map 1952St Pancras Way and Camden Road cross-roads looking to the north east: building St Pancras WayEstate,

The Camden Cottages on the north side of St Pancras Way, seen in the view below, were demolished between the wars for industrial use, while the curved block of Brecknock Crescent was demolished for Bernard Shaw Court, an extension of the St Pancras Way estate.





St Pancras WayOrdnance Survey map 1893C19 postcard view of St Pancras Way, looking to the northwest. Brecknock Crescent on the left and
Camden Cottages on the right, all demolished.

From 1963, the successor Borough of Camden, sometimes through housing associations, continued both to demolish and rebuild terraces (eg in Royal College Street, Rochester Road) and villas (eg 81-83 Camden Road (1975), 91-95 Camden Road (1980s)), and to buy and convert Victorian properties.

With the defeat of the 1960s proposals for the inner ring road junction at Camden Town, and recognition of historic character through national listing of some Georgian properties, planning blight slowly changed into conservation and renovation.

Properties were originally built leasehold, and ownership reverted to the landlord at the end of that time. The law giving lessees the right to buy leases outright changed the property market: slowly, the Victorian terraces changed from 'slums' back into higher-quality housing, both privately as owner-occupier and by housing associations for tenants (eg 1-5 Wrotham Road and in Rochester Road). Architects themselves also built and lived in smaller private premises. North Camden shows all these different phases.

Industrial

Camden Town, with its connection of roads, canal and railways, became a major area for warehouse storage, small manufacturing and light industry. Camden Town was the piano-making centre of the Empire: the circular former panorama painting studio in Rochester Place was, for a time, an organ factory before being demolished.



Hilger & Watts optical instruments works

1983⁸

The largest single employer was Hilger & Watts, makers of scientific instruments, with several sites locally: in 1955, the company requested planning permission to build a canteen at 81 Camden Road to serve their 450 workforce. (It was refused by the LCC, on grounds that the site was zoned for residential use.) Their main site, adjacent at 98-100 St Pancras Way, was built in the 1930s in monumental character, with red brick and white stucco frontage and parapet. However, Hilger & Watts was bought by Rank Organisation in 1968, and its different businesses were dispersed

⁸ Camden Local History Library: 21.821

out of London. The 79 Camden Road site, with a six-storey office block, was used by ASTMS union in the 1980s, and by Camden Council from 1995.

In the mews behind the main roads, initially open plots, there has been piecemeal building since the turn of the twentieth century. These were usually small buildings of brick, often with metal-beamed roofs and skylights. Following the horse stables of the nineteenth century, the twentieth century saw vehicle repair garages, a petrol station (89 Camden Road), and light industrial works (eg electroplating). Larger factories included Idris (mineral water bottling) in Whitcher Place and St Pancras Way. In the 1930s, Rochester Mews led to a bus garage; in the 1950s, the same site was for 'returned bags' of the Post Office.



The Greek Cypriot community in Camden Town from the 1950s brought a new economy including, dress-making and tailoring in small – for example, in houses such as Royal College Street and 3 Castle Road, and continued use in the former Cosprop building 26-28 Rochester Place. From the 1970s, commercial premises have included garages, warehouses, design studios, a recording studio, and a pole-dancing school.

Women's coop, Falkland Road NW5,

Character

The conservation area has three sub-areas.

- Rochester Camden Road;
- St Pancras Way; and
- Kentish Town Road.

These are presented in greater detail in the Appendices, which include details on character, specific features and an audit of decisions.

The descriptions below follow the roads in the direction of numbering.

Camden Road.



Rochester Road, Rochester Terrace and Wilmot Place are set around Rochester Terrace Gardens. A feeling of elegance is captured through the architecture, the open expanse of the Gardens with mature trees, the relatively low height of buildings and the gaps between buildings giving glimpses to the rear back gardens. Rochester Place and Rochester Mews are cobbled, narrow streets, originally service roads to the houses St Pancras Way and Camden Road and now with buildings of varied character mainly from the twentieth century. Camden Road, with two pairs of the original Camden Villas, has buildings set back behind boundary walls and railings, and shrubs overhanging the pavement.

1a Rochester Terrace Gardens

1 – 59 (all) Rochester Road, 1-23 (all) Rochester Terrace and 1-15 (all) Wilmot Place.

Houses of three and four-storeys were set out first along Rochester Road from Camden Road, and then along Rochester Terrace, with smaller houses later at the Kentish Town end between 1840 and 1860. Buildings are in pairs, three and fours, and vary as plots were developed by different builders. The Regency style has London stock with stucco facades. The houses are set back from the road and have small front gardens, usually enclosed by low brick walls with black iron railings and brick piers. Some railings have been replaced with hedges, and some with raised stuccoed or brick walls in a low V-shape between piers. Pavements are mainly of York stone, and tall lamp columns, in Victorian style, with modern luminaries make a significant contribution.



Rochester Road

There is also some in-fill housing. Three small blocks of flats in characteristic 1950s style, were built on bomb sites. A longer 1960s row of maisonettes, with only front gardens and rear access through a service road to garages, was built centrally along Rochester Road. Most recently, Nos 1-2 and 3a Wilmot Place have been developed as new flats.

1b 34-74 (even) and 55-63 (odd) Rochester Place and 2-14 (even) and 20-28 (even) Rochester Mews.

The two streets were originally set out behind villas on St Pancras Way and Camden Road respectively. They have retained cobbles and have narrow pavements. Building started on individual plots in the later nineteenth century, and continues to the present time. One- and two-storey buildings were erected for stables and garages for the houses behind, while some plots were small independent industrial buildings. In the second half of the twentieth century there was changing use for commercial purposes (light industry, offices), and some new building. A few buildings or refurbishments have been commended for architectural merit. However, continued change of use from industrial to residential use, changing facades and extension of heights in the last decade has also had a negative conservation impact.



Rochester Place

1c 79-109 (odd)

When Camden Cottages were set out east-west on St Pancras Way with a service road behind (originally Camden Cottages Mews, later Rochester Place). Camden Road itself was then developed with villas running northwards. Two paired Victorian villas, with some original features, remain at Nos 95-101. Otherwise, running north from Rochester Place there is a group of 1980s maisonette houses built by Camden Council Housing, followed by 1960s flats with ground level shops by Richard Siefert, a 1980s housing association residential development and (after the villas) the London University campus of university residences by from the 1970s and 1980s.



Flats above former garage: Richart Siefert architect, 1965

2. St Pancras Way.



The sub-area is around the intersection of St Pancras Way and Camden Road. The North London railway, with bridges and viaduct forms a visually striking entrance, as St Pancras Way turns northwest. It crosses Camden Road and continues towards College Gardens. The slim St Pancras Way estate blocks are set back from the road behind railings and hedges, giving light and spaciousness, and tall plane trees mark the route on either side.

2a. *Railway line, 8-12 (even) Wrotham Road, 1-5a (even) Agar Place, 1-2b (all) Agar Grove*. The railway bridges and viaduct of the North London Railway cross the road here, and form an important view. This is also the presumed site of Cantelowes Manor: a Mediaeval hearth was found in restoration of a former forge. Five Victorian terraced houses on Wrotham Road, and three in Agar Place (the cobbled mews is locally listed), remain while the rest of the terraces were demolished for Agar Grove Estate. Two corner blocks at 54 St Pancras Way / 2-6 Wrotham Road (Thomas Court) and Linton Court at Agar Grove are modern.



Draft Rochester Conservation Area Statement - Nov 2015

Long-span railway bridge at Baynes Street looking towards the site where the Mediaeval hearth was found in renovation of the forge (side building)

2b. St Pancras Way north side: St Pancras Way estate (six blocks on the east side of Camden Road), and 142 Camden Road; 79 Camden Road, 102-106 (even) St Pancras Way.

The nineteenth century Camden Cottages along St Pancras Way (built at the same time as locally listed Brecknock Crescent opposite) were demolished in the twentieth century. The St Pancras Way estate, locally listed for its historically innovative design, has six-storey blocks of flats with open grass and a central children's play area. The northern blocks face onto Rochester Square (formerly plant nurseries). Inset on the eastern boundary, Pooja Court is a small row of modern maisonettes. 142 Camden Road is a remaining Victorian half-villa. On the northwest side, 79 Camden Road is currently a building site for 164 flats. Adjacent, two early-twentieth century industrial blocks have been renovated – a former bottling factory for an international film company, and a former telephone exchange as flats.



Bernard Shaw House, 19519

2c. St Pancras Way estate (George Bernard Shaw Court), 189-191 (odd) St Pancras Way, 1-34 Foster Court (formerly 192-224 Royal College Street). On the south west side of Camden Road, Bernard Shaw Court completes the St Pancras Way estate development, although built in a different design. It has a

⁹ Camden Local History Library, 89.3, St Pancras Way

courtyard in front and grass, a playground and garages behind. Further west, a paired Victorian villa remains on St Pancras Way. (Palaeolithic fossils were found a century ago in excavation here at Brecknock Crescent.) Foster Court, on Royal College Street, is set back with high railings and a closed service road: the houses are well-maintained and view the grass area and playground of Bernard Shaw house to their rear.



3. Kentish Town Road.

The area starts at Camden Gardens, set out in the early nineteenth century, with the Fleet River culverted below and the North London Railway bridges and viaduct above. The villa houses from 51 to 63 are Grade II listed. To the west there is currently major redevelopment of Hawley Wharf, and similarly running north there was 1950s and 1980s redevelopment, but not of Kentish Town Road itself. The terraces are mainly intact, on the west side running with a gentle convex curve up to Kentish Town. The east side, from Farrier Street, forms junctions with Royal College Street, Rochester Road (closed for vehicles) and Bartholomew Road. There is a characterful view southwards from this junction, although marred by the current pedestrian 'safety' scheme.

3a. On the west side, nos. 65 – 161 Kentish Town Road, with no. 1 Farrier Street, Castle Place and nos. 1-5 Castle Road.

The southern end, starting with a public house, has a long Regency period terrace, with shops and housing above. The Georgian terrace nos 65-97 is mainly complete, although in poor condition. No 1 Farrier Street is locally listed. In the middle section buildings are Georgian, Neo-classical, Gothic, Deco and contemporary; several are

locally listed, including South Kentish Town Underground station, encircled by Castle Place. The northern section is a complete curved, Georgian terrace, to Kelly Street. The western boundary, at the back of the terraces and the small roads, marks the course of the Fleet River.



From Castle Road to Kelly Street

3b. On the east side, nos. Durdan's House, 227-229, 313, and 335-349 Royal College Street, and 236-242 St Pancras Way.

The junction between Kentish Town Road and St Pancras Way, where the road turns runs beside the Fleet river, has had at least three inns in the vicinity. The Castle was sited near the river banks from the seventeenth century; the Black Horse and Nags Head were between the two roads. The Black Horse was rebuilt in the 1880s along with surrounding buildings and improvement of the road.



Black Horse pub, rebuilt 1880s, converted to housing 2011

Farrier Street on the south side has low housing, with influence of the local Cypriot community in style. On the north side, Durdan's House is a large block of early 'model' working-man's housing. Adjacent is a large block built in the1920s as a

warehouse (now offices, and flats on top), while the apex of the junction is an artnouveau building of housing over shops. On St Pancras Way there are further nineteenth century 'model' flats, which view towards Rochester Place, and a corner block at Rochester Road with two shops. At the corner with Bartholomew Road is St Andrews Church (Grade II listed).

Audit of planning decisions - Appendix

Features including Local Listed buildings – Appendix

Community involvement

Since 2002, residents from Rochester, Jeffreys and Camden Broadway residents have actively engaged with the Council in response to planning applications within and around the conservation area

Positive Contributors

The southeast-northwest axis of St Pancras Way has roads mostly parallel or perpendicular to it, and a gentle downhill aspect southwest towards the Fleet at Kentish Town Road provides good light. The open spaces – Rochester Terrace Gardens, Camden Gardens, College Gardens – wide roads, trees and front / back gardens provide a complex range of public realm views, while the smaller mews behind Camden Road have contrasting industrial character.

St Pancras Way, Kentish Town Road and Rochester Road are curved, reflecting preindustrial routes and boundaries. Royal College Street and Camden Road, built in the nineteenth century, are straight. The western border of the conservation area follows the curve of the Fleet River north to the 'pleasure gardens' of the Castle pub. The junction at Kentish Town, though rebuilt in the 1880s and opened up as Farrier Street, retains its historic form. Equally, the junction of Royal College Street with St Pancras Way is created with a triangle of land (College Gardens). Camden Road, originally a turnpike (with toll gate), marches upwards to the York Way. Rochester Place and Rochester Mews are narrower service streets behind the main roads, while Wilmot Place and Rochester Terrace are set around Rochester Terrace Gardens.

Houses, gardens and trees. There are Regency / Victorian houses in Rochester Terrace, Rochester Road, Wilmot Place, Wrotham Road, Agar Place, Agar Grove, Camden Road and St Pancras Way. The houses retain front and back gardens, often with trees. There are rows of mature plane trees along St Pancras Way and

Royal College Street, and a long privet hedge behind railings around St Pancras Way estate.



18-23 Rochester Road

Housing blocks. The 1940s St Pancras Way estate won awards for its wide, grassed spaces and south-facing facades. Foster Court and 17-22 Rochester Road are consistent and well-preserved terraces, with front and back entry, from the 1960s/1970s. Housing blocks, of different periods, around Farrier Street also have internal courts. 85-89 Camden Road is a podium block by Seifert from the 1960s, set back from the main Camden Road. Other smaller blocks are Linton Court and at Wrotham road

Industrial / conversion. Close to Camden Town, the area has a strong commercial history. The biggest employer was Hilger & Watts, with both a main large site and several ancillary industrial buildings. Equally, Dunn's was the national distribution warehouse to more than 100 stores. Other lower buildings of Rochester Terrace and Rochester Mews, in narrower streets, were originally stores or stables, workshops or garages. While many of the buildings have been converted for housing, some have been protected for continued commercial uses.



36-38 Rochester Place - warehouse

Terraces and shops. The three long terraces of Nos 65-97, 99-147 and 149-161 Kentish Town Road have variation in period, and together strong character, despite poor upkeep of the shops. 349 Royal College Street is in late nineteenth century crafts style.

Other. 69 Kentish Town Road continues as a pub, and 147 Kentish Town Road is under Article 4 control. The former pub at 313 Royal College Street also retains some original external features. The ox-blood (former) South Kentish Town Underground station is also in need of restoration. There is a range of borders around Rochester Terrace Gardens. Characteristic street features include wide granite kerbs, stone road gutters and some York stone paving.


Negative Contributors

Houses

The historic architectural aspect of some houses are marred:.

- there are inappropriate roof extensions;
- the boundaries for some properties are of poor quality;
- basement additions;
- some side extensions have been built to full height;
- some back extensions have been built with wide plate-glass windows.

Rochester Road: No. 45 Rochester Road has been marred by inappropriate replacement windows and garden wall; Nos. 24, 38, 41 and 42 have dormer windows (No. 24 has a full width dormer and large party wall) which, although set back from the parapet, have an adverse affect on the roofscape. Nos.34-44 are painted, marring the original brickwork underneath; No. 31 has replacement Georgian-style box windows, with the detail above the window pediment out of character with the building. Nos. 48-49 and 56-59 have had part of their parapet removed, detracting from the appearance.

Rochester Terrace: No 4 has lost its front boundary and has forecourt parking that detracts from the frontage.

Wilmot Place: Nos. 6 and 7 front boundary walls detract from the setting of the surrounding properties.

Rochester Place: The mansard roofed rear extension of No.4 Wilmot Place, and seen from Rochester Place, is out of character. Nos. 64 and 66 have a white painted finish, which mars the original brickwork.

Industrial /conversion.

- Mews buildings, in conversion for residential use have been raised higher than the "low mews type buildings" described in the 2001 Conservation Area Statement.
- Views from within the conservation area as well as the public realm, have been insufficiently considered in recent developments.

Housing blocks.

- Extra-storey penthouse roof extensions, with picture-frame plate glass, have been built on several blocks, diminishing the views of roof lines and creating excess heights;
- some electrical equipment (radio aerials, solar panels) is poorly sited.

Terraces with shops.

- Shops fronts in Kentish Town Road have been poorly controlled in relation to planning requirements and guidance;
- the in-fill at 75-77 Kentish Town Road and the plate-glass entrance at 161 Kentish Town Road are particularly unsatisfactory examples;
- railings and light-wells have been created at 343-347 Royal College Street;
- rear views of these terraces, sometimes with extraction chimneys are also poor.

Other.

- lock-up garages in Rochester Road, with destruction of the original brick wall, are out of character;
- the street railings and pavement at the junction of Kentish Town Road with St Pancras Way are ungainly and restrain public use.

Streetscape audit

Within the public realm, features such as original pavement materials, boundary walls, railings and vegetation contribute greatly to the area's quality, character and appearance. Many historic features, original materials and details help sustain the areas distinctive appearance:

General: granite kerbs, granite channels and York stone pavements; small gardens with mature vegetation, including trees; views of rear gardens or trees between houses, low brick walls, cast-iron railings and gates.

Rows of mature planes on St Pancras Way and Royal College Street. There are pavement blossoming trees at the west end of Rochester Road and in Wilmot Place

Traditional and recent replacement lamp columns (with modern luminaires) around Rochester Terrace Gardens: columns are inscribed Borough of St Pancras and have over painted shields bearing the inscription "CONSTANS JUSTITLAN L'ONIT".

Shop fronts of merit

91 Kentish Town Road has an interesting wood/glass bay window design with side shop entrance.

149 Kentish Town Road, Leverton's, has a corner door and wooden fascia similar to three corner-shops around College Gardens.

In Kentish Town Road, there are corbel mouldings between several shops.

The shop row of 69-161 Kentish Town Roadi without open lightwells or railings .

Street scape positive items.

- The main streets mostly retain original wide granite kerbstones
- There are two double pillar boxes.
- Castle Place remains with York stone, but has LED lighting and is closed off with railings.



- York stone in front areas of Nos 3 & 5 Castle Road
- Occasional coal-hole covers retained in York stone at Dunn's Warehouse
- The former public toilet at the junction of Royal College Street and St Pancras Way is a feature at its junction position

Condition

The conservation area reflects different levels of maintenance investment between self-owned and rented property.

Grade II Listed buildings: St Andrews Church has received regular maintenance. The private buildings by Hawley Road on Kentish Town Road have had moderate maintenance.

Most of the owner-occupied houses and gardens (front and rear) around Rochester Terrace Gardens, and the adjacent mews buildings, have good maintenance. However, there are no financial incentives for restoration of period features.

Housing association property is also moderately well kept. However, there was often loss of period detail in multi-occupancy conversions: a good example is 95 Camden Road.

The St Pancras Way Estate has receives low maintenance. Areas of poor quality have developed, such as the block entrances, the replaced balconies and PVC windows, the parking areas and play areas, and the crumbling brick walls at the periphery.

Dunn's warehouse is in poor state on Kentish Town Road side, and there has been loss of style. Similarly, the upper floors of No 349 Royal College Street and former South Kentish Town station opposite are in poor state.

Much of the rented property, along Kentish Town Road and 3-5 Castle Road, is in poor condition, both shops and houses above.

Boundary

In this 2015 Statement, the boundaries for Rochester Conservation Area have been widened. This

- provides continuity with five adjacent Conservation Areas
- supports an historico-architectural perspective across the full range of the last two centuries
- reflects Camden's Local List approach and includes relevant buildings and streets
- integrates the area between Camden Town and Kentish Town for planning

MANAGEMENT SECTION Issues and Guidelines

Designation of a conservation area gives the Council greater power to control and manage change. It is not, however, intended to prevent all new development. While some developments under the Town and Country Planning 2015 do not formally require permission ("permitted development"), the majority of works within the conservation area will require planning permission, and/or conservation area consent.

Camden's current Unitary Development Plan (UDP) is under review towards a new Local Plan, expected to be adopted in 2016. More specific guidance on topics

continues. The Conservation Area Statement forms part of the Supplementary Planning Guidance (SPG).

Opportunities for Enhancement

Until 2002 north Camden Town either side of St Pancras Way was outside the Conservation Area, allowing a range of developments reflecting architectural fashions of the times. Since 2002, outside the initial Conservation Area, there have been developments harmful to the character of the area – including the change of use of the Falcon and Black Horse pubs, demolition of the Hilger Scientific Works buildings, penthouses raising heights of buildings such as Dunn's Warehouse, poor renewal of shopfronts in Kentish Town Road, and change of use from garages / industrial / offices to housing. There has also been insufficient attention to archaeological heritage. Smaller issues include loss of stone paving and roadway granite setts, persistent estate agent signs, skyline aerials and inappropriate window and balcony renewals.

The planning applications in 2002-2015 within the existing Conservation Area have been quite numerous (perhaps recognising the need for attention required by the regulation) and more modest (recognising the requirements of Camden's design and planning policies). The majority of these planning applications and developments have been approved, and often after modification as a result of consultation. It remains a national problem that applicants can take refusal of applications to appeal while the public (or conservation area committees) do not have this right.

The most pressing opportunity site within the Conservation Area is Kentish Town Road – to protect and enhance these buildings into their third century. The needs include improvement of the front areas (and perhaps planting small trees along the pavement, improvement of doors and windows, control of painting walls, maintenance of roof-lines including roofs and chimneys, and attention to rear views and extensions. A special project for the shops and terraces, of 69- such as those successfully supported by the Greater London Authority, would be beneficial.

Equally to the east, St Pancras Way at the former Elm Lodge corner has high historical importance and the grounds of the neighbouring buildings need maintenance. The North London Line would have been enhanced by the renewal of bridges and return to four tracks proposed for the High Speed 2 Link with Network Rail – unfortunately opposed by Camden Council. Work on the bridges is still needed, along with removal of advertising hoardings and maintenance of pillar brickwork.

The gardens around the St Pancras Way Estate and Bernard Shaw Court, as well as Rochester Terrace Gardens, each include a children's playground. A pedestrian

phase was introduced at the St Pancras Way / Camden Road crossing after the death of a pedal cyclist in 2009, but only on the north side (another has been requested at the Camden Road / Royal College Street junction to link with the new cycle route). Continued attention to improve pedestrian safety at, and experience of, this road junction will contribute to increased social exchange between these otherwise rather isolated sections of the Conservation Area.

Control on roof extensions that applies around Rochester Terrace Gardens must be applied more fully across the new Conservation Area. (Similar control should be applied to basement excavation. National and local policies for increased housing have been exceeded in the area, when taking account of the conversion of Richard of Chichester School, the Employment Exchange, 79 Camden Road and neighbouring Agar Grove Estate. There must be a concerted effort to retain and enhance the industrial-character parts of the Conservation Area and equally to strengthen the character and features of the nineteenth century housing.

The Conservation Area was originally set out with brick villas and terraces. A range of housing has been built in the twentieth and twenty-first century, from 'model' tenements to architect's mews. Fashions change, and the Conservation Area includes buildings of many periods and styles - Georgian, Regency, mid-Victorian, late-Victorian, Gothic, Deco, modernist and internationalist. The evidence suggests that it ownership impacts substantially on maintenance and building investment.

In management of the Conservation Area the Council is encouraged to engage with its Housing Department, housing associations, and private landlord organisations to generate positive attitudes to building maintenance and refurbishment, and transcend the opportunities for short-term profit.

New	There is no vacant land. New development must focus on
Development.	restoration and refurbishment. No 102 St Pancras Way forms
	a good example of refurbishment, while overdevelopment (eg
	26-28 Rochester Place) is negative. Renovation with picture-
	frame sliding windows, roof terraces and penthouses are not in
	character and should be resisted. The historic rows of Kentish
	Town Road need special attention, for renovation of the
	properties and improvement of the shops.
Design,	While the conservation area includes a wide range of styles, it
	the most significant concern is to retain character and balance
	in building heights, depths and mass.
	A second concern is to retain light and green space – both
	public and private – which also contributes to Camden's
	biodiversity
Listed Buildings,	There are Grade II listed buildings on Kentish Town Road, and

	Camden's Local List 2015 has more than a dozen sites – including a disused station and a cobbled mews – within the boundaries of the Conservation Area.
Materials and Maintenance,	Owner-occupiers have given generally good maintenance for properties. Attention should be given to quality of both private and public rented-sector housing, and shop facades on Kentish Town Road. Appropriate historic materials and methods should be used for renovation
Demolition,	Demolition of previous buildings has had some negative contribution to the conservation area. Complete demolition of 98-100 Hilger optical instruments factory buildings was against public wishes. Other demolition – the Presbyterian church hall (Royal College Street), Castlehaven garages (St Pancras Way) – has also replaced diverse building uses with blocks of flats. Further demolition has been approved for 6a Wilmot Place / Rochester Road, and 11 Rochester Mews.
Change of Use,	Inappropriate change of use was allowed for the Black Horse pub, Royal College Street, especially following similar change for the Falcon pub nearby. Change of use from office to residential will continue to be resisted, eg 68-74 Rochester Place. Change from single to multiple occupation will be resisted.
Roof Extensions,	Further roof extensions or penthouses should be resisted across the full conservation area to retain rooflines and reduce visual intrusion.
Rear and Side	Massing from side and rear extensions should be resisted to
Extensions,	retain views between villas / terraces and visual intrusion.
Conservatories,	There is little information on existing conservatories, but would normally be acceptable at ground floor level only.
Facadism,	Facades show a strong range of architectural design periods – Georgian, Regency, Victorian, Italianate, Gothic, Model, Deco, Zielenbau, Modernist, Post-modern. Renovation should respect original architectural intentions including decoration.
Windows,	Window renovation is preferable to replacement, keeping original materials (wood, metal) rather than PVC. Sash windows should be used when historically appropriate, rather than casement, and attention to appropriate glazing bars (not stuck-on).
Doors and	The variety of doors, some original, should be retained.
decorative	Mouldings on Victorian buildings should be retained, and
details,	decoration also restored on twentieth century buildings – eg Dunn's warehouse, south Kentish Town underground station (Deco decoration).

Trees and	Pavement plane trees need attention, being historic but some
Landscaping,	over-large for their sites. Rochester Terrace Gardens needs continued attention. Private gardens importantly contribute trees, providing views from the pavement as well as for residents. Trees are lacking in Kentish Town Road and those in properties on Camden Road need reduction.
Gardens and	The three public gardens (Rochester Terrace, College,
Boundaries,	Camden) and the grass around St Pancras Way Estate and George Bernard Shaw House are important green areas. While there is welcome variation, attention is needed to appropriate boundaries and quality, and to reducing hard standing in former front gardens. The rear views of housing terraces also need consideration – particularly those on Camden Road from George Bernard Shaw House, those on Kentish Town Road from Clarence Way estate.
Satellite Dishes,	Unsightly aerials or dishes on some public sector blocks, eg St
	Pancras Way estate. and at sides of buildings, eg 17 Rochester Road, and on housing blocks, eg Durdan's House, should be removed
Roof Gardens,	Roof gardens are not characteristic for the area and should be resisted. Ground level gardens and pitched roofs are the norm.
Basements,	Basements are not characteristic for this area, and should be resisted. Parts of the area are subject to flooding from hillside springs and the Fleet river.
Archaeology,	There is important evidence from 1890 of the area having Palaeological importance in Camden. St Pancras Way, being a long-standing road, may have foundations of interest nearby, as the Mediaeval hearth found in 1990.
Traffic. Parking	Traffic reduction continues to be an objective (the 1960s
and the Public Realm,	closure of the west end of Rochester Road provides a major benefit). Main road parking is controlled by red routes as well as standard yellow markings. Camden's Parking Zone CA-G, with northern boundary at Rochester Road, covers most of the area. A two-way cycle path is now being built along Royal College Street
Shopfronts/Shopf	The shop fronts of Kentish Town Road are in poor condition.
ront Security,	and need substantial attention, both for visual and commercial environment. Attention also for the shops on the Kentish Town, Royal College Street apex. Conversion to residential premises must be resisted
Signs,	Attention is needed to remove the large advertising hoardings

	under North London Line St Pancras Way bridge and outside 89 Camden Road, opposite the station. Advertising at shop windows also needs control. Advertising on 128a Camden Road, visible from the conservation area, must also be stopped.
Ventilation Ducts	Ducts can be seen at the rear of buildings which have
	restaurants on front main roads.
Estate Agents	Estate agents leaving boards illegally, particularly those
Boards,	erected on the first floor which cannot readily be removed,
	require Council action. Creation of the large conservation area
	boundaries will enable the limit of only one per building.
	Camden does not allow estate agent boards on its estates –
	perhaps this interdiction could be extended to the whole area.
Conversion	Along the shop fronts, there must be attention to retaining
	residential use above shops and commercial use at ground
	level.

CURRENT ISSUES

Design

Where development detracts from the character and appearance of the Conservation Area, it is often through lack of respect for historic context, and the following themes recur:

- use of inappropriate materials
- inappropriate bulk, massing and/or height

Character Erosion

There has been a gradual erosion of many elements that contribute to the character and appearance of the Conservation Area, especially to residential properties. This sometimes occurs through permitted development rights and permissions including:

- alteration and addition to roofs and parapet walls
- alteration to or replacement of windows, porches, doors, and other features
- loss of traditional railings or gateposts
- car parking within front gardens
- loss of garden walls
- loss of original features
- inappropriate extensions
- inappropriate painting of brickwork, walls or fences.

There are several streetscape features that detract from the Conservation Area, and these should be removed or replaced as the opportunities arise, including: • use of concrete block paving (buff on street corners and red by Rochester Terrace Gardens) • street boxes for telecommunications equipment.

Streetscape enhancements should be made in accordance with the Council's Streetscape Design manual for Camden that identifies an overall image for the Borough.

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South Kentish Town Road

Kentish Town was a village from the fourteenth century, with its centre – the green – at the junction of the roads to Highgate and Holloway. The 1804 map of the parish of St Pancras, shows Kentish Town Road joining Camden Town and Kentish Town. It forded the River Fleet midway, at approximately where Camden Gardens are now. Further north on the west side, making a slight forward bend, was a terrace of houses (Providence Place) while, on the east side, several older buildings including the Black Horse Pub were the junction with Kings Road (St Pancras Way).

James King's Panorama, which recalls views of from the early 1800s (although the commentary is from around 1850), notes: "Providence Place, known as the entrance to the village, where stood six wooden Cottages, since pulled down and replaced with Brick fronts. The vacant frontage is now filled by small Shops, continuing to ... a Splendid Gin Palace erected in lieu of the Old Castle Tavern".





The Fleet River (now tunnelled) passes down the West side of Kentish Town Road (from "Spring Place", past "Angler's Lane" to "Water Lane"). An original access to the river from Kentish Town Road ran down behind Providence Place, now preserved as a small open area between Nos 97 and 99 Kentish Town Road at no 1 Farrier Street: Maps from the early nineteenth century show the development of the area. A map of 1809 shows some buildings down both sides of Kentish Town Road, and a track that later became Great College Street.



Greenwood's 1827 map gives a slightly different version. There are villas on Camden Street, and terraces in Jeffreys Street and on the east side of Kentish Town Road (all now within Kentish Town conservation area). At the entry to Kentish Town, the Black Horse pub and Dove's Place were opposite Montevideo Place and 'Kentish and Camden National School. Visible on maps from 1830 is 'Burfords Panoramic Painting Rooms'. [Robert Burford, who lived at '35 Camden Road Villas', managed two panoramas in Leicester Square and the Strand¹.

In the Laurie map of 1841, Moreton Terrace is shown on the west side of Kentish Town Road opposite Jeffreys Terrace, and villas south from Hawley Road to the Fleet.

¹ https://regencyredingote.wordpress.com/2013/02/15/family-feud-the-other-london-panorama/





1841

1843

In the (Rumsey) map of 1843, there is a set-back row opposite Camden Gardens and two full rows closer to the road along the west side of Kentish Town Road, with Hawley Road and Clarence Road marked out. This was all to the east of the Fleet River, still in the land of The Earl of Camden.

The Earl of Southampton began developments of the area in the 1840s. A map 1849 for the post office, with a tentative line for railway, shows development of the west bank of the Fleet (which were demolished in the 1950s for Clarence Way Estate).





. 1849

1862

By 1862 the pub at the corner of Hawley Road and the Castle pub, with Castle Place at the corner of Hampstead Road (now Castle Road), are shown.

The Survey of London in 1938, for 'Kentish Town Road and Highgate Road, west side', notes that "A certain number of the early houses remain, e.g. Nos. 65 to 95, 101 to 107, and 119 to 131"² In the post-war period, however, there was substantial demolition of the terraces through compulsory clearance orders, leaving only the houses fronting Kentish Town Road. Cherry and Pevsner (1998, p393-4) say: "On the w. side, post-war rebuilding has destroyed all coherence: one could hardly guess that until the C19 all this area was occupied by the pleasure gardens of the Castle Inn alongside the Fleet River running from Parliament Hill. Kelly Street is the only Victorian street that was allowed to remain..."

Nos 51 – 63 Kentish Town Road

These seven houses stand as separate and paired villas in their original style. No 55 is Grade II listed, and the row is opposite Nos 44-50 Kentish Town Road, also Grade II listed. All were listed in 1974, when properties in the area were being restored after removal of planning control for the proposed inner ring motorway.

The Historic England citation for No 55 says: Detached villa. Early C19, restored c1979. Yellow stock brick with slated pitched roof with pitched dormers. Double fronted with 3 windows; 2 storeys, attic and semi-basement. Stucco pilasters at angles rise from ground floor level to carry entablature with egg-and-dart ovolo cornice at eaves level. Central prostyle portico; doorway with fanlight and panelled door approached by steps with attached cast-iron railings. Recessed sashes; ground floor architraved with console bracketed cornices and cast-iron balconies.³

For Nos 57-63:

2 pairs of semi-detached villas. Early C19. Stucco with slated hipped roofs and central slab chimney-stacks. 2 storeys and semi-basements. 1 window each and 1window recessed entrance bay each side. Pilasters rise from ground floor at angles and centrally to carry an entablature with egg-and-dart ovolo cornice at eaves level. Square-headed doorways with fanlights and panelled doors; Nos 57 & 59 with floating console bracketed cornices; Nos 61 & 63 with rosette decorated architraves and console bracketed cornices. Recessed sashes; ground floors architraved with console bracketed cornices, Nos 57, 61 & 63 with cast-iron balconies. No.63 with at-

² Survey of London: Volume 19, the Parish of St Pancras Part 2: Old St Pancras and Kentish Town, ed. Percy Lovell and William McB. Marcham (London, 1938), pp. 52-59 http://www.britishbiotecn.co.uk/gummer, london/vol10/pt52 50 [concerned 24 August 2015]

history.ac.uk/survey-london/vol19/pt2/pp52-59 [accessed 24 August 2015]. ³ https://www.historicengland.org.uk/listing/the-list/list-entry/1379237

tached cast-iron garden railings on stone capped sleeper wall with stone capped pillar and cast-iron gate.

The row had light bomb damage ("non-structural")

There have been relatively limited alterations during the last 40 years. No 51 was in use as a retail shop in 1975, then changing first to a newspaper office (Hackney Gazette) and in 1988 to a dental clinic. No 53 had alterations to the boundary wall in 1996 and 2003, with retrospective permission for multiple occupation in 2010. No 55 (listed) had a single basement extension approved in 1991, but application for a two-storey back extension rejected in 1999. No 57 received 1977 approval for a two-storey extension (and – strangely – listed building consent). No 61 had renovation approval in 2013, and No 63 had pre-app advice in 2013 for rebuilding the back conservatory and extension.

Camden Gardens is a triangular garden – like College Gardens, at the north apex of two roads. It is set out with gates at north and south sides, and some mature trees. Several new trees have been planted but repeatedly die because they are not watered.

The North London Railway was built across the middle in 1849, leading to Camden Road Station. It is built of local stock brick, but has attached external galvanised posts holding the electric wires. The railway track has two sets of points, and there was a signal box on top of the viaduct.

There has been complete demolition of the roads behind Nos 51- 63 for the new Hawley Road estate. The view west from Camden Gardens will be transformed, with nine-storey blocks of flats, and a school, behind the low Georgian houses.



Nos. 65 - 91 (Moreton Terrace)

The terrace was built in the 1830s and converted to shops which retain some of their features. The shops are close to the road, with small areas, no railings and a relatively wide pavement in front, contrasting with the longer gardens of the earlier Jeffreys Terrace opposite. Both sides of the road need visual improvement.

No 65 was known in 1854 as the Moreton Arms⁴. Wider than other buildings in the terrace, slightly higher, and built a decade later, it forms a strong corner to the row, with a wooden shop facade and retaining pediments to the first floor windows (these follow round in to Clarence Way).

Nos 67-73 form a balanced row. Some retain windows in original design, both at the front and rear, and parapets without cornices hide low roofs. The fronts are brick painted, some in colour in an Irish fashion. The small front areas are mainly concreted, although no. 71 has original York stone. There are neither basements nor railings.

⁴ <u>http://pubshistory.com/LondonPubs/StPancras/MoretonArms.shtml</u>



The rear views of the houses are visible from Hawley Road. The pub has a singlestorey extension on its side flank. Some are white painted and with valley roofs. There are some added ground floor back extensions, and various quantities of ventilation and electrical equipment on walls. An elegant red- brick wall has been built in 2015, and a rather surprising vine with grapes in season, grows from one of the gardens, overhanging the service road from a tree.





No. 75-77 is a 1950s infill, stretching back the full length of the plot to the rear. It is a long-standing cycle sales and repair shop. No. 79, in on a plot which lead to garages at the rear. This was converted (2004) to four-storey (including basement) front, and internal circular staircase to flat above, in grey render with large picture-book windows. (Architect AEM Studios Ltd, London EC1.) The large door provides an entrance to 3 maisonettes built on three floors, abutting lock-up sheds to the rear and high blank walls seen from Bradfield Court (built 1970s) behind. The front of No 79 is not a shop: the ground floor front room and basement were given 'lawful permission' for use as a further flat in 2012.



Nos 81 – 97 continues the Georgian terrace northwards. No 87 is locally listed, because it was the home of Dame Lillian Barker, reformer of female prisons in the first half of the twentieth century. Some houses have painted brick or render, (one black, three white). The moulding is retained around some windows, with No. 89

retaining the original design of white paint against the London stock brickwork. There are some sash windows, but several have been converted into PVC forward-opening casements. No 81 retains corbels either side of the shop fascia. The shopfront at 91 has an interesting bay design, and retains a corbel (behind a neon sign) and pilaster on the north end.



No 91

No 97



The front wall of no 93 has been rebuilt: there are no mouldings, just plain concrete window lintels and the bricks fit irregularly with its neighbours. Nos 95 and 97 also have no mouldings, but instead have brick window lintels. No 97 had both side and rear additions (two 'maisonettes) in 2005. There are built in bright yellow brick rather than stock: the side addition is narrow, and at full height rather 'subordinate'.

1 Farrier Street

Further back, separated behind tall railings that enclose the Clarence Way estate from Kentish Town Road, is a detached villa house, No. 1 Farrier Street. In the Local List (**Ref 520**) it is described as a "Rare surviving remnant of the former street housing that existed in this area prior to clearance and replacement with the post war housing estate". There are views onto the rear garden of No 1 with brick wall and tree. The entrance from Farrier Street into the Clarence Way estate is cut off by high railings (although there is a gate for pedestrians). In front, a pavement space with two trees has been formed.



Looking northwards, between the estate and the backs of Nos. 99-109, a short service road for the estate curves to the northwest, where the gardens lengthen, indicating the line of the rivulet that led down to the Fleet behind the Castle gardens. A new vigorous red brick wall has been built along the rear line. Further along, with space from the estate, the area behind houses along Kentish Town Road is rather open, with some trees behind single-storey garages, and the higher (newer) buildings on the east side of the road can be seen over the Georgian row.



Nos 99 – 145 Kentish Town Road.

The building line of this continuous row curves outwards with the road and then back again, with a modest incline, and narrowing towards the junction with Royal College Street, providing interest to views both north and south. On the west side of the road, there are mainly three storey buildings, from several periods of the nineteenth century. The east side of the road has taller buildings from later periods, including the six-storey former Dunn's warehouse, and the high buildings significantly reduce light in the roadway.

Nos 99-109.

No 99, a larger corner building, was (at the corner of Clarence Road) The Clarence Arms until 2002. It has publicans listed from 1867 – 1944⁵. The picture below (2002⁶) shows the pub closed, and up for sale. At this time the parapet has been lowered and the window mouldings are mostly gone, but the ground wooden floor facade onto Kentish Town Road remains, with illuminated sign-frame and pilasters, although blocked windows

⁵ <u>http://pubshistory.com/LondonPubs/StPancras/ClarenceArms.shtml</u>

⁶ <u>http://spitalfieldslife.com/2014/03/10/antony-cairns-dead-pubs/</u>



Conversion included a three storey side/rear extension, mansard roof extension, for conversion to offices (classes A2 or B1a only) and six self-contained residential flats (3x1 bed and 3x2 bed).

The entrance in Farrier Street has a disability entrance slope and railings - although apparently not required for the residential side entrances. The ground floor now has metal windows, rather than wooden, with opaque glass. A small raised brick garden is set on the York stone outside the back extension, alongside trade rubbish bins.

No 99a – presumably, by the numbering, it was the same building as No 99 – retains more external details: a side pilaster and corbel for the shop, simple arched window mouldings on the first floor and a higher top parapet. However, the windows are PVC and appear to open outwards rather than as sashes.



Nos 101 – 105, built first in the 1830s, have low parapets, with first floor window plaster surrounds but casement window replacements. While keeping the parapet line, No 105 has windows (and presumably room heights) that are slightly lower 101-103. All have London stock fronts, although the top floors for all appear rebuilt (brick bonding onto no 107 is irregular). There are pilasters and decorated corbels around the shop facade of No. 105.



No 105

Nos. 107-109

No 107, perhaps of a different period, has been cleaned. The brick is more reddish, and there are strong rubbed red-brick window heads above broader double-paned sash windows.

No 109 is white-painted on brick. There is one shopfront corbel remaining, and a patterned brick cornice at the parapet. The wide windows have interesting triplepaned wooden sashes.

For the row 101-109 there are no roof extensions, and chimneys are intact.

Nos 111-117.

Nos 111-117 are a symmetrical terrace of modified Gothic Revival (or perhaps Flemish) style, in red brick (no 117 alas painted white). There are tall chimney stacks, retaining chimney pots, over sharply pitched roofs either side and equally pitched dormers in the central pair. Some original sash windows but most converted to casements. All the corbels remain between the shop signs.



Nos 119-127 (Providence Row)

Nos. 119-127 are pictured in *The Fields Beneath* illustration 13a, at the left edge. They form a balanced terrace of five two-storey brick houses with shop below. There are low parapets, with low-pitched slate roofs behind, running parallel to the road, and two central chimneys are retained (one with chimney pots) and one is extended upwards with that of No. 129. Windows are single-paned double sashes (originals in nos. 121 and 127) or replaced with casements.



In rear views, visible from Loraine Court, Clarence Way Estate, there are no upper back extensions, and only one rear wall is painted.



Nos 129 and 131 are three-storey buildings of brick painted white. 129 has double windows on two floor, and 131 a single window on the first floor only.

Applications initially for development of no 123, and subsequently for the full row 119-127 Kentish Town Road, were rejected in 2012 and 2013. Providence Row was proposed for Local Listing in 2012, and was on the draft list in 2013, along with the Castle pub (below).

Nos. 133 and 135

No. 133 (Local List Ref 381) is currently a long-standing Chinese fish-and-chip restaurant, painted scarlet on the brick upper storeys, turquoise terrazzo tiles on the ground floor and dragon-painted corbels. There is a side door (entrance to rear) between 133 and 131, making it free-standing, but the kitchen is at No 135 and has a large metal chimney up the north face. There are three storeys, with a parapet, hipped roof and central chimney. This house (as some others remaining in Kentish Town) is set perpendicular to the main road, with the top front window and four (north) side windows all blocked – presumably to lessen window tax.

In *The Fields Beneath* (1977, p105), Gillian Tindall says of No. 133: "A very few of these houses built in these years are now there, hacked about and disfigured, disguised behind inappropriate modern shop fronts, their twelve-paned windows usually replaced by sheets of later glass. One stands below the (rebuilt) Castle [public house]..."



Nos. 137-141



No 137-139. In 2005, a small single-storey cafe (on land originally set out for terrace housing, and possibly a bomb site or demolished for building the adjacent

underground station) was replaced with a new cafe and residences on four storeys (Evans Davies Architects, London EC2). The curved roof is innovative, and the brown/black brick tones with the neighbouring Underground building. [Camden Council initially rejected the application on grounds of height – the loss of amenity for north-facing windows of No 133 – but the full development was accepted on appeal.]

Castle Place

Castle Place runs between Nos 137/9 and 141 Kentish Town Road backwards, and turns an angle to the west of 5 Castle Road. It was set out with the rebuilding of the terraces and corner pubs in Kentish Town in the 1850s:



It has original York-stone paving and modern LED lamplights. However, it is currently closed by a recently-installed green metal fence.



Note that '1-4 Castle Place' is a row of modern two-storey buildings that face west, into the Clarence Way Estate. (This north east part of the estate is also elsewhere labelled 'Castle Place'.)

No 141 Kentish Town Road was purpose-built for London Underground as South Kentish Town Station. Requiring demolition of several three-storey terraced houses

then attached to the Castle Tavern, it was opened in 1907 – but closed in 1924 because of 'low use' (at that time the Northern Line ran only to the next station, (north) Kentish Town Station. John Betjeman wrote a piece called South Kentish Town in 1951 in which a fictional passenger becomes trapped in the disused station.

The building has Leslie Green's characteristic ox-blood ceramic-coated bricks and pillars (Cherry & Pevsner 1998, p 53), and on the second storey are high-arched windows with multiple-pane metal frames. The original station signage along the parapet has been removed. The distinctive style was used for several stations built nearby in the same period on the Northern (and Piccadilly) lines, including Camden Town, (north) Kentish Town and Caledonian Road stations.

Its current use is as a second-hand / pawn shop. The basement (no natural light), until recently licensed as a massage parlour, is currently approved as a place of worship. At the side there is entrance to a sauna.

No. 143 The Castle

The Castle inn stood at the entrance of Kentish Town from the seventeenth century. The current Castle was built, at the end of a terrace (demolished for the underground station), around 1850. It was of stock brick with ornate stucco, as side quoins, window pediments and a strong top cornice, upon which was a hipped slate roof around a central chimney⁷.



⁷ <u>http://pubshistory.com/LondonPubs/StPancras/CastleTavern.shtml</u>

The Castle was closed as a pub in the 1990s, and passed through various disguises as a late-night music club. It was empty from 2011 and put forward for local listing in 2012. An attempt at demolition in 2013 led to widespread reaction, and Camden has served an Article 4 order requiring planning permission.

Castle Road

Nos. 1-5 at the beginning of Castle Road are three plots behind the Castle that stand within the square formed by Castle Place. No. 1 has wooden paling fence enclosing an empty area. Nos. 3 and 5 are (currently) three-storey houses with back extensions.

Camden's Member's Briefing report for an application in 2014 for No 5 Castle Road says: "The building comprising of No.3 & 5 was constructed circa 1960's". However, all Nos. 1-5 have a metre of York stone paving at the front, set at a slight angle to the pavement, showing their origin in the Victorian period (No.5 has modern railings around the front and sides). Moreover, on the exterior wall of No. 3, the chimneys that would have served rooms of No. 1 can be seen, for two floors only – showing their two-storey origin as Victorian terrace in Castle Road.



Nos. 3 and 5 both have similar semi-circular arched windows on the first floor, building and, while having a party wall, they have been altered separately. Camden's records show No. 3 as a cafe in 1959 (refusal to convert to a club), but from 1969 applications separately for each house described them as dressmaking workshops. Dressmaking continues on the ground floor of No 5, but No 3 appears to be used for international money transfer, without clear use of the back room.

No 3. built a third storey and extension in 1988 for workshop use, with external stairs, and gained change of use for first and second floors to residential in 1993. No 5. gained change of use of the first floor in 1991 and permission to build a second floor and ground / first floor side extension in 1997.

In 2014, No.3 was permitted to build a fourth-storey mansard extension and new terrace at the rear, but this has not yet been built.

The side extension at No. 5 is two-storey, with terrace and grand wisteria.

Opposite Nos. 3 and 5 Castle Road, No. 2 Castle Road carries the northern boundary line. Adjacent along the north side of Castle road is a 1990s three-storey row, of brown brick and ground floor white render. No 2 has render (painted red at present) around a shop with a corner door, and a side entrance to the upper floors. The rear one-third of the building, attached to the back of No 149, is of Victorian stock and, in plans submitted for a single-storey back extension, the rear view shows a valley roof. The rear extension building of No. 149 Kentish Town Road forms an acute angle, and retains an area of York stone.



149-161 Kentish Town Road



The eight houses and shops between Castle Road and Kelly Street are all threestorey without front areas, and mostly retaining chimneys. No. 149 has window mouldings and render throughout, reflecting the Castle opposite, the other seven shops in the row are of London stock without cornices or window mouldings but keeping similar corbels at the shop level along the whole row.

At appeal for an application in 2002 for a mansard roof extension for the mid-terrace No. 155, the Inspector determined it that "the largely unaltered roof-storey of this property helps to maintain the architectural integrity of the upper floors." The end of terrace No. 161 was built with a mansard and gables.

No. 149 is built in modest Georgian style with window mouldings and stucco cornice, and retaining a rounded wooden frame for the corner shop entrance. These are premises of Leverton, a firm started at St Pancras in 1763 by carpenter John Leverton, and funeral directors to the Royal Family since 1991. ("There is no written contract," [Clive Leverton] said. "It is just a handshake really."⁸)

Nos. 159 and 161 have rough bonding of the front wall bricks, indicating rebuilding. The properties are of yellow stock, but No. 153 (alone and perhaps rebuilt) with red brick window architraves. Nos. 151-157 and No 161 all have single front windows: No. 153 has six-by-six sash, no 155 has two-by-two sashes and No. 161 are single-paned sash. No. 157 is painted white on brick.

No. 161 has two high front and rear stacks with total of 14 chimney pots. The mansard roof slopes towards Kelly Street, with a rendered parapet. The Kelly Street side has sills on the second and third storeys with bricked window recesses and a redundant corbel for the shop facade. At the back there are two windows on the first floor, one on the second and a gable. There is a low newer building across the back entrance to the row, next to 1 Kelly Street. A large wooden painted panel on the corner has no sign on it.

Among planning considerations, No. 155 was refused permission in 2006 for 'Change of use of part of ground floor from retail (Class A1) to mini cab control office (Sui Generis)', but No 151, which has no recorded applications, is currently operating as a taxi office. At No159, Change of use for the upper floors one 2-bedroom flat into two studio flats as refused in 2012 – due to loss of the two-bedroom flat and too small accommodation.

No. 161. In 2009, a successful retrospective application was made to change the lower ground and ground floors from retail (Class A1) to estate agent office (Class A2). However, the Officers Report noted a concurrent enforcement action for (EN09/0189) for 'replacement of shopfront without planning permission' was outstanding. The corner shop has little remaining of the traditional shop front and corner entrance.



⁸ https://en.wikipedia.org/wiki/Funeral_directors_to_the_Royal_Household

On the northeast side of Farrier Road is Durdans House, erected at the same period as Farrier Road, in the 1880s, as 'model housing' (possibly built by Samuel Toye⁹, who built at the same time in Bethnal Green¹⁰; the style is also similar for blocks in Clerkenwell). It is a four-sided block (surrounding the rebuilt Black Swan) and forming an internal courtyard. There are five storeys of yellow brick (sometime cleaned), with red-painted stone column-edging and architraves, lateral cornices above the second and fourth storeys, and chimney stacks. The doors are wood, with modern yellow tiles surrounds added. On the long southeast side, and curving round to the northeast side, the building is set slightly back, with a narrow concreted area (no basement), and outside low, curved railing.



The Black Horse pub, at 313 Royal College Street, had a history from the eighteenth century. With the rebuilding of this entrance to Kentish Town, the old pub was demolished, the road widened, and the new pub built. Publicans are listed from 1890 to 1944 (http://pubshistory.com/LondonPubs/StPancras/BlackHorseCollege.shtml) but the pub was in active use until permission was given in 2006 for conversion of the ground floor into housing.

 ⁹ <u>http://edithsstreets.blogspot.co.uk/2014/03/north-london-railway-camden-road.html</u>
¹⁰ <u>http://www.british-history.ac.uk/vch/middx/vol11/pp126-132#anchorn53</u>



The building is in uncleaned stock, with red brick pillars and some white keystones over windows. There are dormer windows in a set-back slate roof, and long horizontal lines also from cornices at each floor and window ledges, with a decorated top cornice of brick. The sash windows are white. The ground-floor facade appears unchanged structurally, keeping the pub sign, but all the woodwork is painted white – uncharacteristic for pubs. The title over the entrance is now 'Black Horse Appartments'. Active work of the Conservation Committee contributed to rejection (2008, no appeal) by Camden Council of proposals to add a back extension on the fourth floor and raise the building by adding a fifth floor.

The largest building in the row is the former Dunn's clothing warehouse. The building faces both Royal College Street and Kentish Town Road, where the main entrance is (No 335 - 341).



Royal College Street side.



Street Elevation to Kentish Town Road looking East

Kentish Town Road side

This was the centre of Dunn's national distribution to 100 stores around the country. Cherry and Pevsner (1999, p. 393) call this "a large factory DUNN'S: the ground floor has nicely detailed 1930s windows with stained glass" – no longer evident.

The building has similar design on both roads (the Kentish Town Road side gets more sunlight), with a well-proportioned white stone (painted) facade. At ground floor are plain pillars with small art-deco corbels around recessed windows. Above are fluted columns/ giant pilasters and long metal windows from first to fourth storey. Large cornices cross horizontally at first floor and roof levels. The pavement on the Kentish Town Road side has glassed lightwells without railings, and residual York stones around the pillars.



Unfortunately, the building roofline is damaged by an extension which protrudes above the front parapet, both from side and front views. And while in 2000 the permission (PEX0000820) was given for a two-storey roof extension for business premises, an application – after an initial refusal – was approved for conversion into

14 1-2 bedroom flats (2004/5123/P). There is currently a proposal to change the ground floor from B1 offices to A1/A2/B1 use.

343-347 Royal College Street & 116-120 Kentish Town Road London NW5.

A terrace of four houses built with shops, on four floors plus attics in the roofs. The first floor achitraves and pillars between double sash windows are painted stone. The ground floors retain detailed corbels and pilasters, but with plate-glass shop fronts.

From 1995 the premises have been approved for hostel accommodation. Ringley Estate Agents (address then 63 Fortess Road, NW5), gained permission in 2003 for replacements of the shop fronts and installing railings around the perimeter. Change of use from three ground floor retail units (Class A1) to residential use (Class C3) was refused in 2009. One of the four shop fronts is used as the entrance to the building. The other three are currently loan shops / financial services (Class A2).



The northernmost part of the triangle, including 118 Kentish Town Road, is designated 349 Royal College Street, although the building above is joined with 343-347 Royal College Street and 112-116 Kentish Town Road. The facade for 349/118 is strong, with well-presented shop windows, pilasters to the second floor, industrial-style metal windows on the second floor, brick third floor with white stone semi-arches, and slate roof with dormers. However, the external state of repair of the upper floors appears weak.

Royal College Street



On the northeast side of Royal College Street, Nos. 236 – 244 were built in 1885 as Kentish Town Residences (described as 'tenements')¹¹. There are five blocks, each of five-storeys, facing directly onto the street. There is a low rendered, cream-painted wall around a small front area and timber doors for each block leading to the flats off central internal staircases. Stone window architraves and their central pillars are cream-painted, and have generous multi-paned windows (now PVC). To the rear, from Rochester Place, there is more detailing and the flats share an oblong area of grass (where there were buildings on nineteenth century maps), fenced off with green railings in 2003, with trees now forming a shaded garden.

No 120-122 Kentish Town Road. The building provides a strong four-storey finish to the row along St Pancras Way. There is a side entrance forming No 47 Rochester Road, with upper side windows which show the staircase inside, and other false windows. to the corner block. The building is highly decorated in yellow and red brick, with pediment between ground and first floors, prominent corbels upholding balconies with iron decorated railings on second and third floors, and roof with pinnacles. The main frontage has two retail units with modern facades, without open lightwells: currently the corner is a dentist and its neighbour is a 'family' shop.

The railings placed for the 'traffic scheme' at this junction make pedestrian crossing particularly awkward, and an extension of the concrete-block pavement in front of Nos.120-122 Kentish Town Road does not enhance the character of the road in front of the shops:. Outside No 349 Royal College Street, the former below-ground public

¹¹ Cherry & Pevsner (1999): p393

toilets – testimony the former prosperity of the junction for shopping – retains railings and currently has use as a music recording studio.



St Andrews Church (originally St Barnabas, Grade II listed) is at the junction of Bartholomew Road and Rochester Road. (Rochester Road is closed to vehicles from Kentish Town Road, with four young trees set in paving, and modern railings along the main road perimeter.) The Church, by Ewan Christian (Listed Grade II), was built in neo-Gothic style in 1884-5. St Andrew and St Barnabas both had connections with Cyprus. From the 1950s as a Greek Orthodox cathedral, the internal walls are painted in Byzantine style. Externally, the church is built in stock brick with stone dressings and thin red brick bands. The low semi-circular western entrance is balanced by the higher curved windows, internal arcades and eastern hemispherical apse. The front elevation has a coped gable with horizontal stone blocks and a central pointed arch entrance. The pitched roof is slated with red tile cresting and stepped brick eaves cornice to nave and aisles of almost the same height.

Views at the Junction

Looking to the north are views of St Andrew's Church (numbered 46 Rochester Road but with public entrance on Kentish Town Road; Grade ii Listed; currently a Greek Orthodox Cathedral with considerable internal religious painting); and beyond, the red-brick Abbey Pub (No, 124 Kentish Town Road) starts the main east side of Kentish Town high street.

To the east, Rochester Road has been closed off from Kentish Town Road since the 1960s, and the view towards the stuccoed terraces and Rochester Terrace Gardens is now reduced by four trees in the pavement.

South: John Richardson's book (1999) on Kentish Town has a C19 print from mid-Victorian period, looking down Kentish Town Road with the Castle pub lights visible on the right and the angled junction buildings to the (then) Kings Road, with the Black Swan in the distance. A similar, less atmospheric view is also held in Camden Library. Reconstruction in 1880s retained the road forms.





https://www.flickr.com/photos/camdencouncil/3527355011/in/photostream/

Vickers, Ben

From:	Zoe Hughes <zoe.hughes@sportengland.org></zoe.hughes@sportengland.org>
Sent:	11 December 2015 09:09
То:	PlanningPolicy
Subject:	Kentish Town Neighbourhood Plan

Thank you for consulting Sport England on the above Neighbourhood Consultation.

Planning Policy in the **National Planning Policy Framework** identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.

It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, '**A Sporting Future for the Playing Fields of England – Planning Policy Statement**'.

http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planningapplications/playing-field-land/

Sport England provides guidance on developing policy for sport and further information can be found following the link below: http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/

Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations. http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/

If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes. <u>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</u>

If you need any further advice please do not hesitate to contact Sport England using the contact details below.

Yours sincerely

Planning administration Team Planning.south@sportengland.org

Zoe Hughes Senior Planning Administrator

T: 02072731761 M: 07919994793 F: 01509 233 192 E: Zoe.Hughes@sportengland.org

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Creating a sporting habit for life

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Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF

Please note: Sport England planning services will be operating a Christmas shut down from Wednesday 23rd December 2015 at 5.00pm until 9.00am Monday 4th January 2016. All planning applications and consultations received during this period will not be formally received/accepted until Monday 4th January 2016.

Merry Christmas and a Happy New Year!

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Vickers, Ben

From:	Hiley Andrew <hileyan@tfl.gov.uk></hileyan@tfl.gov.uk>
Sent:	27 January 2016 17:31
To: Cc:	PlanningPolicy Celeste Giusti
Subject:	RE: Kentish Town Neighbourhood Plan consultation
Subject.	RE. REILISH TOWIT NEIGHDOUTHOOU FIAN CONSULATION

Thank you for consulting TfL Borough Planning.

TfL's interest in the Kentish Town Neighbourhood Forum area is primarily related to Kentish Town London Underground station (TfL owned), Kentish Town West station (served by TfL London Overground), bus stops and bus movement, and traffic flow on Kentish Town Road, which forms part of London's Strategic Road Network (SRN). TfL also shares the Council's aspirations to greatly increase cycle use, particularly for everyday journeys.

The submission version of the Kentish Town Neighbourhood Plan (KTNP) generally accords with the London Plan in terms of strategic transport policy. In particular the policy support for expansion of the cycle hire scheme to Kentish Town is welcomed, but this will need to be further supported by identifying and safeguarding sites for cycle hire docking stations, and funding from local development/CIL; the KTNP could be more explicit in this respect, for example in 'Getting Around: Project 2'.

As has been pointed out in previous TfL comments at earlier consultation stages, the KTNP focuses heavily on step free access (SFA) provision at all three railway stations in the area (for example Policy GA), yet there are no plans for either TfL or Network Rail to provide this in the foreseeable future. The cost of SFA can be very expensive, particularly at deep tube stations like Kentish Town, and SFA provision at these stations does not appear on the council's CIL Strategic Funding list. These factors mean it is unlikely that SFA will be delivered in the plan period.

It is therefore strongly suggested that the KTNP, whilst retaining broad policy support for SFA, instead focuses (for example in Policy GA) on more detailed, up-front policy support and local CIL funding on other more deliverable schemes that benefit accessibility, such as public realm improvements, dropped kerbs and decluttering streets. Kentish Town benefits from good bus access and proximity to central London and with all buses being accessible, provides a viable alternative to rail services, so local funding for accessible bus stop provision and bus priority has proportionally large benefits; specific policy support and local CIL funding for this would be welcomed.

As also pointed out previously, decking over railway lines for development is problematic and expensive, which is why it is used in limited locations in London. A degree of policy support in the KTNP is valid in this respect, though it could be considered overly detailed given the likelihood of occurrence during the plan period (Policy D2).

Policy SSP1 (Car Wash site) has been amended to include reference to relocating the bus shelter, rather than bus stop; however it includes the very specific statement 'move the bus shelter backwards by 1 metre'. It would be more appropriate simply to say 'relocate the bus shelter' – the standard location for a shelter is on the kerbside, to minimise pedestrian/bus passenger conflict, but any relocation here will need to be assessed for optimal safety and pedestrian flow.

I hope you find these comments useful. Please feel free to contact me if you require any clarification.

Regards

Andrew Hiley | Principal Planner | TfL Planning

Transport for London | 10th Floor, Windsor House, 50 Victoria Street, London SW1H 0TL Telephone number: 020 3054 7032 (auto 87032) | Email: <u>andrewhiley@tfl.gov.uk</u>

For more information regarding the TfL Borough Planning team, including TfL's *Transport Assessment Best Practice Guidance*, and pre-application advice please visit <u>https://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance</u>

From: PlanningPolicy [mailto:PlanningPolicy@camden.gov.uk] Sent: 03 December 2015 14:08 Subject: Kentish Town Neighbourhood Plan consultation launches today

Dear Sir / Madam

Re: Kentish Town Neighbourhood Plan

Kentish Town Neighbourhood Forum has submitted their proposed Neighbourhood Plan to Camden Council, in accordance with the Neighbourhood Planning Regulations 2012.

We are consulting residents and interested stakeholders on this proposed Plan.

How does this affect me?

A Neighbourhood Plan is a statutory planning document setting out planning policies for the development and use of land in the area. The Plan sets out a range of policies on matters including design quality, enhancing Kentish Town Road and community engagement. It also proposes to designate 5 Local Green Spaces in the area. The Neighbourhood Plan, if approved, will be used, alongside council policies in making planning application decisions in the neighbourhood area.

To view the proposed Neighbourhood Plan (including a map showing the boundary for the Plan) and further information on how to respond to this consultation please go to: www.camden.gov.uk/neighbourhoodplanning

Hard copies of the Plan and documents are available to view at:

• 5 Pancras Square Library, London, N1C 4AG

Opening Hours: Mon - Sat 8am – 8pm and Sun 11am – 5pm)

• Kentish Town Library, 262-266 Kentish Town Road, NW5 2AA

Opening Hours: Mon - Thu 10am - 7pm, Fri 10am - 5pm, Sat 11 - 5pm

Comments must be received by **29 January 2016** by e-mail to <u>planningpolicy@camden.gov.uk</u> or by post to

Strategic Planning and Implementation Team London Borough of Camden Judd Street London WC1H 9JE If you require additional information please contact the Strategic Planning and Implementation Team on 020 7974 8988.

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Vickers, Ben

From:	Planning <planning@theatrestrust.org.uk></planning@theatrestrust.org.uk>
Sent:	15 January 2016 16:40
То:	PlanningPolicy
Subject:	Kentish Town Neighbourhood Plan

Our Ref.: A/6976

The Theatres Trust supports the draft Kentish Town Neighbourhood Plan.

Remit: The Theatres Trust is The National Advisory Public Body for Theatres, safeguarding theatre use or the potential for such use; we provide expert advice on theatre buildings including, new design, heritage, property and planning. Established by The Theatres Trust Act 1976, the Trust delivers statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO), requiring the Trust to be consulted on planning applications 'involving any land on which there is a theatre'.

Advice: The Trust supports proposed policy CC3 and policy SSP7 in so far as they aim to protect and promote community and cultural facilities for the benefit of the local community. Both policies reflect guidance in the National Planning Policy Framework. In particular para. 70 states that to deliver the social, recreational and *cultural facilities* and services that the community needs, planning policies and decisions should guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.

Regards,

Ross Anthony Planning Adviser The Theatres Trust 22 Charing Cross Road, London WC2H 0QL Tel: 020 7836 8591 www.theatrestrust.org.uk

Protecting Theatres for Everyone National Advisory Body for Theatres

Vickers, Ben

From: Sent: To: Subject:

PlanningPolicy social housing

With reference to your planning document for Kentish Town. More than everm, the local residnets of Kentish Town need affordable housing. This means building as many council homes as possible for rent to those with families in the area.

The provision of housing for working people is in crisis. Developers won't build because it would affect their profits. It is up to councils to do so in the spirit of Lansbury and the Poplar councillors of the 1930s.

Best wishes

Phi I