

Camden LDF Site Allocations Consultation

Site 2: Camden Town Hall Extension, Euston Road/Argyle Street

Response: Richenda Walford for Friends of Argyle Square, 20/4/12

Abuse of Planning power

The special nature of this site must be addressed. It is owned by the Council who are in the process of selling it and, for political and economic reasons, need to maximise its sale value. Thus, special care must be taken to ensure the Council do not abuse their position of Planning authority for the site. This is not the equivalent of Camden's Planning department acting as the Planning authority for an application such as adding a conservatory to a Camden owned house. Unlike a house the Town Hall Extension has the potential to be an extremely high value site: in this prime location with an expectation of planning permission for a 16 - 22 storey tower this could be worth many millions. To construct the economic case for moving offices to King's Cross Central Camden Council had to set a sale value on the Extension site. For this they had to make some assumption about what height of building would receive Planning permission and, in discussions in 2009-11 it was clear that 16-22 storeys was the assumption. Planning must not be led by the needs of Camden's property department, but the Site Allocations document as it now stands shows that that is happening. We are concerned that the guidelines already show contamination from the sales process in that the addition of paragraphs 2 and 3 of *Further Information* is the only major textual change to these guidelines since they were last published. And these two paragraphs are the ones that most aggressively make the case for a large development.

We already feel let down by Camden's Planning department in that there are no planning guidelines regarding building heights that would protect this extremely sensitive site, and we are not happy to leave this crucial decision to the vagaries of the planning application process. We recognise and accept that when Camden sells the site they are duty bound to sell it for maximum value but this will be within the constraints provided by the Planning department. The Planning guidelines as laid out in the Site Allocations document have to be robust enough to resist the greed of developers and Camden's sales department.

We are not qualified to say whether this abuse of Planning power indicates UNSOUNDNESS or a lack of "LEGAL COMPLIANCE". To overcome this failing the document would have to have all the recommendations we make below enacted.

Conservation Area Statement 22 – King's Cross

Unlike other councils such as Islington or Westminster, Camden has no planning policy regarding tall buildings; each site must be assessed on its own merits. However, strong guidance is provided in the "Conservation Area Statement 22 – King's Cross".

1. Section 7.3.1 says: "New development should respect ...existing features such as ...**roof lines**....".
2. Section 7.3.2 says: "Developments which are overtly modern will not be resisted, provided they have regard to the layout, **height and scale** of existing development within the Conservation Area".

We trust that, for buildings such as this, which are inside but on the edge of a Conservation Area (King's Cross) which butts up against another (Bloomsbury) the two Areas will be treated as one. The document certainly refers to some of the nearby buildings in the Bloomsbury Area so we take this to be the case (it would be shocking were it not). The document pays lip service to having "regard to theheight and scale of existing development" but fails badly by giving every indication that a tall building would be acceptable, as shown below at:

1. Tall Building,
2. Biased context 2 – Euston Road,
3. Biased context 4 – Immediate vs. distant context,

4. Biased context 5 – Excludes context not encouraging tall buildings

The document makes no reference at all to “roof lines”. Were it to do so it would be implying a maximum height of about: 4.5 storeys (the Town Hall), or possible 8 (Queen Alexandra Mansions behind).

Thus this section of the document fails to abide by the Planning Guidance provided in the relevant Conservation Area Statement. We do not know whether this is UNSOUNDNESS or LEGAL NON-COMPLIANCE. To overcome this problem all references to increasing floorspace, listed at “Tall building” below, should be removed and a statement inserted: “Any new development should respect the rooflines, height and scale of neighbouring buildings, with particular regard to the listed buildings. This indicates that any new building should be no taller than the existing building”.

Tall building

The documents demonstrate a bias in favour of a tall building. Camden Planning Department is indicating that it will look favourably on an application to erect a tower block.

1. Paragraph 5 of *Further Information* states that “More efficient use of the site could be generated through additional floor space.”
2. Paragraph 7 of *Further Information* refers to “increase in gross floorspace”,
3. Paragraph 2 of *Further Information* refers to the “scale and grandeur of St Pancras Chambers” not, we fear, to suggest that any new building should accept second place to this, but more as a summit to aim for.

All the points we make below regarding “Context” show that the document is slanted to show that the site is in a location where a tall building would be appropriate, and insufficient reference is made to all the reasons (including those already cited above in “Conservation Area Statement 22 – King’s Cross”) why it would be inappropriate.

In contrast there is no reference to the opposition shown to a tall building demonstrated by the local community:

1. This opposition was raised vociferously at the first Stakeholders Meeting, organised by Camden in October 2010.
2. A commitment to restrict the height of a replacement building was formally requested in an email to Robin Stratton of Camden on 31 May 2011. “So, prior to its production, we put in a formal request now, that the Development Brief should clearly specify that the height of any new building should be no greater than that of the current building.”

To overcome this UNSOUNDNESS the changes suggested at “Conservation Area Statement 22 – King’s Cross” would have to be enacted.

Precedent

It seems perverse that the document pays such attention to the existing context of the site but fails to even mention the precedent that would be set were a tall building to be erected. There are a number of buildings on the south side of Euston Road (Argyle House, the Barclays Bank building, the Access building, 1-11 Euston Road, and other buildings to the west) which are not listed and which would come under pressure for replacement with more tall buildings. A tower block on the Extension site could over time result in a high “wall” confronting St Pancras and King’s Cross, and towering over the low-rise residential streets behind.

To overcome this UNSOUNDNESS the changes suggested at “Conservation Area Statement 22 – King’s Cross” would have to be enacted together with the insertion of: “A cluster or row of tall buildings to the south of King’s Cross Station and St Pancras Chambers will be resisted.”

Biased Context

We have identified five ways in which the document selectively chooses biased context in order to make a tall building appear more acceptable:

Biased context 1 – Pivotal location

At *Site Context*, the first sentence reads: “The Town Hall Extension site occupies a pivotal location in Central London”. No; King’s Cross station and St Pancras station are a pivotal location in Central London; the Extension occupies a subservient position close to this. The site lies **close** to a pivotal location because of its proximity to an interchange hub, but it is not **itself** a pivotal location. While occupied by Council offices there might be an argument that the site is pivotal but by moving out the Council are downgrading the importance of the site. (The functions carried out in the Town Hall itself are of minor importance to the populace in comparison with those in the offices housed in the Extension.) Since the site does not occupy a pivotal location there is no need or desirability for it to be excessively tall or iconic in design.

To overcome this UNSOUNDNESS the first sentence in the *Site Context* section should be removed.

Biased context 2 – Euston Road

Paragraph 3 under *Site Context* contains “...along Euston Road...Building heights vary from 3 to 18 storeys.” This shows a gross bias towards falsely constructing a context of tall buildings. Taking both north and south into consideration: to the east there is only one building of 6 storeys, most having 4; to the west until you reach Unison and Novotel the buildings are no higher than 8 storeys, many much lower. Unison (11) and Novotel (16) are two junctions away and are so distant that, in terms of context, they cannot be seen as anything other than remote. Also “3 to 18 storeys” completely ignores the significant section of road in front of the British Library on which there is no building at all - 0 storeys. The tallest building in the context of the Extension is the Extension itself at 8.5 storeys. The 18 storey building referred to is so far away that we have not yet identified it. This is a gross inaccuracy and must be corrected.

To overcome this UNSOUNDNESS the sentence “Building heights vary from 3 to 18 storeys.” should be replaced with: “With the exception of the towers of St Pancras Chambers, the site itself is occupied by the tallest building on this section of the Euston Road and on the surrounding streets.”

Biased context 3 – Central London:

The document repeatedly (we counted 7) refers to the site being in “Central London” and on one occasion uses this phrase in contrast to ‘high street’. In general usage the phrase conveys a context which is only partly accurate for this site. It implies a predominance of high-rise offices which ignores the school and extensive residential building stock to the south, all low-rise.

To overcome this UNSOUNDNESS: if this phrase has a technical meaning then it should be made clear that that is the sense in which it is being used. If no such technical meaning exists then the phrase should either not be used or its meaning should be qualified as in the previous paragraph.

Biased context 4 – Immediate vs distant context

Under *Further Information* is given “Opposite Kings Cross Opportunity Area”. As far as we know the King’s Cross Opportunity Area is geographically synonymous with King’s Cross Central, with the addition of the refurbishment of the listed Midland Hotel.

Paragraph 2 and 3 of *Further Information* refer to King’s Cross Central (the Argent development) and ‘the changing context’ as if these were changes taking place ‘local’ to the

Extension site. This is extremely misleading; there are indeed major developments taking place at King's Cross Central but they are not visible from the Extension site and none of the new buildings will be visible from street level at this site. Anyone standing outside the Extension would have no idea that King's Cross Central/King's Cross Opportunity Area exists. It is not only invisible but it is also some distance away. The Northern ticket hall (not actually part of King's Cross Central) is the nearest new building and that is so low-rise that it is entirely hidden behind the listed Northern Hotel. We believe the nearest new high-rise that is planned is north of the German Gym and so well over 300m away, and the furthest point of King's Cross Central is about 1,250m away. It is UNSOUND to present this large development, most of which is so far away and none of which can even be seen, as giving immediate context to the Extension site.

To overcome this UNSOUNDNESS: either King's Cross Opportunity Area and King's Cross Central should not be mentioned at all, or equal weight must be given to a similarly distant area south of the site making the point that it contains many listed buildings, very few high-rise buildings, is as residential as any London suburb and includes Coram's Fields and Russell Square, and where there is minimal development in progress, or planned.

Biased context 5 – Excludes context not encouraging tall buildings

Whilst searching out every possible context that might justify a tall building the document fails entirely to point out the almost exclusively low-rise nature of the buildings to the south. Examining the buildings that immediately surround the Extension:

1. the joined building, the Grade 2 listed Town Hall is only 4.5 storeys,
2. the next nearest building, listed Georgian style terrace is only 4 storeys,
3. the Dolphin pub is only 4 storeys,
4. the Queen Alexander Mansions are only 8 storeys,
5. Argyle School is only 4 storeys, with a 0 storey playground occupying the plot closest to the Extension site,
6. the main body of the all-important context, the Grade 1 gem, St Pancras Chambers, is only 6 storeys.
7. Also the nearby site to the north occupied by the British Library has a sizeable forecourt of 0 storeys.

Spiralling out from the 8 storey Extension, the first building of greater height that would be encountered, apart from the towers on St Pancras Chambers, would be either the Novotel/Unison or the residential 12 storey Glynde Reach south of Holy Cross Church. Both of these buildings are nearly 300 metres away and so neither provides context to the Extension site, in any meaningful sense.

To overcome this UNSOUNDNESS: if either of our recommended changes given at "Conservation Area Statement 22 – King's Cross" or "Biased context 2 – Euston Road" are not enacted then the document should include reference to the height of all the buildings mentioned in this section ("Biased context 5 – Excludes context not encouraging tall buildings").

Repeating the error

Paragraph 2 of *Site Context* states "The design, massing and appearance of the building in relation to its 'senior partner' are unsympathetic. The King's Cross Conservation Area Statement identifies the town hall extension as having a negative contribution to the conservation area." If it is true that the building has failed architecturally to the extent that it must be demolished then it is essential that guidelines are put in place to ensure that the replacement building does not make the same mistakes. We have to ensure that "the design, massing and appearance" of the new building are sympathetic to the Town Hall. "Design" and 'appearance' are terms that are difficult to analyse in any useful way but "the massing" concerns the overall volume occupied by a building, and this is measurable. Only

with rather convoluted thinking could this criticism of the existing building be taken as a recommendation that a replacement should be bigger. If the Extension was a mistake we must learn from that mistake and (quoting from the same paragraph) “..to enhance the townscape of this section of Euston Road and improve the setting of the town hall” any new building must be well-designed (whatever that means), have a better appearance (whatever that means) and be **smaller**, i.e. not a tall building.

To overcome this UNSOUNDNESS the document should replace the statement: “The design, massing and appearance of the building in relation to its ‘senior partner’ are unsympathetic” with “The design, volume and appearance of the building in relation to its ‘senior partner’ are unsympathetic.”

Efficiency of current building

Paragraph 2 of *Site Context* states “In terms of performance and facilities the quality of the building is not sufficient to function well and requires significant intervention.” The same point is repeated at paragraph 5 of *Further Information* “...a poor quality and inefficient building...”. This is an assessment made by its current owners, who happen to be the Council, and has been disputed by others with experience of maintaining office buildings. We would not dispute that these services may have reached the point where it would be sensible to replace them. However, we feel that the Council have overestimated the cost of doing so. We are not aware of anything intrinsically wrong with the building itself, although environmental standards have moved on since it was built. A simple analogy might be a Miele washing machine that needs a new pump. If it was given a new pump it might last another 5 to 10 years, or alternatively you could dump the whole machine and buy a new one that uses less electricity. The Council has exaggerated the cost of the new pump and focussed on the possible electricity saving. Look at the bigger picture and it can be seen that it is inherently wasteful throwing something away that still has plenty of potential life in it. We know of at least one potential buyer who, if successful, has every intention of renovating the existing building. The party who have assessed the building as being not worth keeping is the very one which has every motivation to sell it for development. This issue is at the very least contentious and so should be left out of the guidance.

To overcome this UNSOUNDNESS all reference to the alleged poor quality and inefficiency of the building in terms of performance and facilities should be removed.

Bias to demolition

The document makes only one reference to “refurbishment”. The rest of the document is predicated on redevelopment. The benefits of retention are not discussed:

1. Sustainability – none of the environmental costs of a new build would be incurred,
2. Attractiveness – the current building, like many others of its date, is gaining admirers with each year that passes.
3. Flexibility – the Extension is already designed with a very flexible interior which could be put to many uses.

One reason put forward for demolition, the supposed inefficiency of the building, is not SOUND (see above) and so any bias to demolition is also UNSOUND.

To overcome this UNSOUNDNESS either all references to demolition should be removed or the benefits of retention (given above) should be added to the document and the word “obvious” should be removed from the sentence “Redevelopment of the site presents an obvious opportunity to enhance the townscape of this section of Euston Road and improve the setting of the town hall.”

Edge of Conservation Area

Whilst in the King's Cross Conservation Area the site is on the very edge of the Bloomsbury Conservation Area. This is not mentioned which implies that the interaction between any building on the site and that Area can be ignored.

To overcome this UNSOUNDNESS the proximity of the Bloomsbury Conservation Area must be stated and a statement made that the interaction between any building on the site and the Bloomsbury Conservation Area must be fully considered.

The box.

What is the significance of the graphic box? The first paragraph in that box is not even a sentence so it conveys no meaning. When these guidelines were last published this box was headed up "*Site Allocation – Suggested Approach*" but that has been removed and replaced with "*Site allocation guidance*". What is written inside the box is almost exclusively about redevelopment. This is UNSOUND because a) the significance of the box is not clear, b) if the box indicates importance, we have already demonstrated that there should be no bias towards redevelopment.

To overcome this UNSOUNDNESS the box should either be removed or its significance should be made clear. Also the phrase "Development will be expected to:" should be replaced with "If the site is redeveloped it will be expected to:".

Sloppy work

At 3 points this document makes out of date and inconsistent references to the location of the Council Offices:

1. The 'box', first sentence,
2. The 'box' third bullet point,
3. *Further Information* 4th paragraph.

This is confusing and calls into question the accuracy of all the other information in the document.

To overcome this UNSOUNDNESS all references to the location of Council Offices should be brought up to date and made consistent.

Architecture

We fully agree that:

1. Any new building should "...fully appreciate and respond to the setting of the Grade I listed St Pancras and Kings Cross stations and Grade II listed Town Hall and nearby listed terraced Housing"
2. "... and improve the setting of the town hall."

However we question the recommendations made in the document for what type of building would best achieve these laudable aims:

1. "architecturally exemplar building" (first bullet in 'box')
2. "makes the most of its unique location" (first bullet in 'box') – (at the expense of the buildings that have created that unique location?)
3. "significant piece of new architecture" (*Further Information*, paragraph 2)
4. "high quality modern building" (*Further Information*, paragraph 5)

Much of this text is mere verbiage expressing nothing useful. Whilst we agree that a pastiche heritage building is not desirable on this site we are unhappy with the aspirations expressed in the phrases used. It is a constrained and relatively small site; there is no room for a Gherkin. "New architecture" can go out of date (you have only to review the life-cycle of the Extension to see that). A simple, elegant, restrained building - in terms of design,

materials, bulk and height - would provide the best setting for the nearby architecture which has stood the test of time. An analogy might help: an ornate pendant is not best displayed on a dress with a fancy pattern; it is worn against a plain fabric.

To overcome this UNSOUNDNESS the 4 phrases listed above should be removed from the document. Since it is such an empty phrase we are less concerned about the fourth item.

Meaningless paragraph.

Further Information, 9th paragraph reads: "The interaction of the building with Euston Road, the quality of the public realm around the site and route from Euston Road through to Tonbridge Street would benefit from greater clarity and enhancement." That last phrase "greater clarity and enhancement" conveys no meaning to us.

To overcome this UNSOUNDNESS a meaningful phrase should be used. We cannot offer a suggestion since we have no idea what is intended.

Consultation Process

We are concerned that the consultation process regarding this site is seriously flawed. Many local people expressed interest in the future of this site by attending the Stakeholders Meeting, organised by Camden, in October 2010. There are 12 individuals, representing 7 organisations, who attended that meeting (and are hence known to the Council as "having a stake in the area") and who are not listed in the "Who was consulted" section of the Statement of Consultation document. These are:

1. Paul Cockle – Camden Hotel network
2. Sister Lynda Dearlove – Women @ the well
3. Zoe Coleman – Handel Mansions Tenants Association
4. Catherine Packard – Hillview Residents Association
5. Harvey Bass - Tonbridge House Residents Association
6. Philip Nelson and Laura Wynne – Argyle School
7. John Hartley, Kate Solomon, Richenda Walford, Bill Reed & Alfie de Popolo – Friends of Argyle Square.

That last organisation, FoAS, has been regularly contacting the Council since the second of only two Stakeholder meetings. Between February 2011 and notification of this consultation on 3 April 2012 we have written 25 emails mainly to Robin Stratton (Head of Asset Strategy and Valuation, Property Services Division) but also to Ed Watson (Assistant Director Regeneration and Planning) and David Morrissey (Principal Planner - Sites Team). We were unaware that any consultation regarding the Planning Guidelines for this site (i.e. Site Allocations) was in progress. So we thought the next stage for the Extension site was in the hands of the Property team and we were trying to get the Stakeholder meetings restarted and some form of Collaborative Planning for the site initiated. Not one of these three people, two of whom were in the Planning department - one on the Sites team, thought to tell us about this consultation. Many, perhaps most, of our emails went unanswered but occasionally Robin Stratton told that we would be contacted soon, and never were.

One other very important group as regards the Extension is the Residents' Association for the people who live in and/or own flats in St Pancras Chambers. That organisation is not on the list and was not consulted.

Thus the document is UNSOUND because (quoting from the "Representation Form Guidance Note") "evidence of participation of the local community and others having a stake in the area" is seriously lacking. How can this be rectified? Our suggestion is that a

Collaborative Planning process should be initiated immediately. Given the contentious nature of this site (as described at 'Abuse of Planning Power' above) and the national importance of the site (opposite St Pancras Chambers) it should be made the subject of a specific Planning Brief created from a collaborative planning process.