THE REGENT'S CANAL CONSERVATION AREA ADVISORY COMMITTEE

31 OVAL ROAD, CAMDEN TOWN, LONDON NW1 7EA

Chairman: Anthony Richardson

Please reply to: Anthony Richardson email: anthonyrichardson@arparchitects.co.uk Tel: 020 7485 0991

Amanda Peck
Development Control
Planning Services
Town Hall
Argyle Street
London WC1H 8ND

18 Sept 2014

BY E-MAIL

Dear Ms Peck

Kings Cross Central Gas Holder Triplets Enabling Works and Conservation Area Demolition Consents, Application Nos. 2014/4762/P and 2014/4763/C

The Regent's Canal Conservation Area Advisory Committee objects most strongly to the proposal to demolish and later rebuild a part of the canalside boundary wall alongside this development.

1) Not all of this demolition is previously approved – drawing CAC_5 in the conservation area demolitions approval 2004/2320/C identifies a section of wall numbered '2' as 'Canal wall refurbished and height gradually tapered down to accommodate new levels', that is, not demolished. That intention is also in accordance with the now intended landscape design. Drawing CAC_5 shows this section '2' extending from east of the towpath bridge to halfway along the lock; moreover, in our understanding the current landscaping proposals will continue the wall at diminishing height still further towards Gasholder No.8.

In the current submission statement (pdf part1, p.23 of 52), drawing _S_N1_1602A shows the wall demolished right back to the end of the towpath bridge over the entrance to the former Coal and Stone Basin, i.e. including almost the whole of section '2'. In Section 3.2 (pdf pt1, 36of 52), it is stated this demolition is 'approved under Conservation Area Consent ref. (ref. 2004/2320/C)'. This appears not to be true, as explained above.

2) We note that the wall is proposed to be reinstated, using salvaged bricks, but we do not consider that is satisfactory, as explained in (3) below. It is stated tersely, without further justification, that this two-stage refurbishment process (removal and reinstatement using salvaged bricks) is 'due to the existing poor condition of the canal wall'. We dispute that the wall's condition is 'poor', as old walls go, and certainly it is not such as to necessitate the demolition of this historic feature.

Designed as a road parapet and partial retaining wall, this wall is robust. The exposed surfaces of the bricks are weathered, but not to great depth and not impairing structural integrity. Some of the pointing is missing, but that can readily be remedied.

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3) Following other approved demolitions, this will be the last remaining stretch of traditional boundary wall between the one-time Great Northern Goods Yard and the canal towpath. It is a feature that was essential to the design and character of the railway goods yard and it dates back to the goods yard's establishment in the early 1850s, when this was the grandest railway goods yard in existence. The other stretch of boundary wall to be retained, immediately to the south-east, is a part of the viaduct of the former Wharf Road with arches for stabling, and so of a quite different nature from this section. It is most important that the wall in this application is also kept in its original fabric, for its historical and archaeological interest.

The goods yard boundary walls used distinctive, deep-red-coloured London Stock bricks which were a feature of the area, unlike some other bricks of the 'multicoloured' type that have a greater admixture of yellow. This makes this wall distinctive, while the weathering of the wall also gives a pleasing patina of age. If the wall were taken down and rebuilt reusing its bricks, the weathered surfaces would become mixed up while the original mortar would be difficult to replicate, so the end appearance would be detrimentally different. The structure itself would no longer be authentic.

- 4) There is another aspect of the wall that is important and distinctive, concerning the manner in which it is carried over the entrance arm to the former canal basin for coal and stone. There is a shallow relieving arch over a concealed cast-iron beam. A similar feature spanning the entrance to the Granary basin has been destroyed in the development. The proposed demolition would stop short of the relieving arch but only just short. It is important, for appreciating this arch both architecturally and structurally, that it is seen to be part of a continuous wall. So a junction with rebuilt brickwork immediately adjacent as proposed will be highly discordant.
- 5) The Regent's Canal Conservation Area Management Strategy (p.39) remarks that the 'retaining' walls (sic) to the canal form an essential element of the character of the conservation area, and there is a general presumption in favour of their retention. The special relationship of the walls to the goods yard as a boundary feature, mentioned above, is an additional reason for keeping them. This section of wall was determined to be kept in the outline consent, despite the KXC scheme's general assault on the walls, and it must not now be decided to demolish it.

Indeed, since the tapering down of the landscaped surface levels behind the wall will now extend over a longer length than initially provided for, the existing wall should be kept standing (although lowered in height) over a longer length south-westwards than was indicated by '2' in the approved drawing CAC_5.

We therefore urge that the demolition and rebuilding element of the proposals be reconsidered.

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6) It may be that the real reason for the applicant wanting to demolish this wall is that it might simplify the installation of the temporary works. But that should not be a legitimate reason for destroying a heritage asset. It may be the contractor would have to use a piling crane smaller than the largest, and operate with more care in the vicinity of the standing wall, but that is not insurmountable.

7) Incidentally, there is a cast-iron bridge structure alongside the relieving arch in the boundary wall, hidden from above and not identified on the drawings, that hitherto has carried Wharf Road over the basin entrance. This is another historic structure. It has no consent for demolition and it needs to be kept and to continue serving the replacement cycle path. It is not mentioned in the enabling works methodology and the owner must ensure that there are precautions to prevent damage by heavy plant.

Yours sincerely

Malcolm Tucker for the Regent's Canal Conservation Area Advisory Committee.

cc Alan Wito, Conservation Officer cc Claire Brady, English Heritage