



**Canal &
River Trust**

Keeping people, nature & history connected

18 November 2015

Camden Borough Council
Planning Services
Town Hall
Argyle Street
London
WC1H 8ND

Our Ref BWYS-PLAN-2015-18781-1
Your Ref 2015/6015/P

Dear Ms Litherland,

**The Town & Country Planning Act 1990 (as amended)
Planning & Compulsory Purchase Act 2004**

Application No: 2015/6015/P

Proposal: Internal & external alterations associated with refurbishment of Western Coal Drops & northern 20 bays of eastern Coal drops with adjacent viaducts & erection of new roof level extension between east & west coal drops & single storey shop units at Lower Stable Street and associated works.

Application No: 2015/6018/P

Proposal: Reserved matters regarding refurbishment of 16 Western Wharf Road Arches & southern 5 bays of Eastern Coal Drops & adjacent viaduct within Dev Zones I & M for retail uses together with landscaping, plus conditions associated with outline planning permission for mixed use development of former railway lands in Kings Cross Opportunity Area.

**Location: Coal Drops Yard Stable Street, King's Cross Central, London, N1C 4AB
Waterway: Regent's Canal**

Thank you for your consultations dated 30 October 2015 in respect of the above.

The Canal & River Trust is a statutory consultee under the Town and Country Planning (Development Management Procedure) (England) Order 2015. The Trust is a company limited by guarantee and registered as a charity. It is separate from government but still the recipient of a significant amount of government funding.

The Trust has a range of charitable objects including:

- To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment;
- To protect and conserve objects and buildings of heritage interest;

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Patron: H.R.H. The Prince of Wales. Canal & River Trust is a company limited by guarantee registered in England & Wales under number 7807276; and a charity registered with the Charity Commission under number 1146792.

- To further the conservation, protection and improvement of the natural environment of inland waterways; and
- To promote sustainable development in the vicinity of any inland waterways for the benefit of the public.

After due consideration of the application details, the Canal & River Trust is supportive of the exciting design proposed for these buildings. We have the following specific comments to make for both applications:

Lighting

As described, minimal lighting should be installed near the canal, and any lighting should be bat friendly, avoiding spillage onto the canal waterway. It is recommended that bat friendly lighting is used throughout the development to encourage local bat populations.

Surface water discharge from landscaping

It is stated that there will be a planted and landscaped roof on the Western Wharf Road Arches building (which has apparently already been approved in the Fish & Coal Office & Reserved Matters application). It is not stated specifically where rainwater from this area discharges to.

The documents do state, however, that surface water and foul water networks will discharge into the existing Thames Water infrastructure, so it can probably be assumed this will include the green roof discharge.

The contaminated land report has given consideration to the Regent's Canal as a potential sensitive receptor, so that appears adequately covered.

There also appears to be adequate mention of construction waste management.

Towpath Access

The two arches proposed to be opened will provide direct access onto the Regent's Canal towpath. While we accept that these have been positioned at a location to improve visibility, there is still potential for conflict with towpath users, particularly with cyclists from either direction. We are concerned that this might require retrofitted measures later on, such as bollards, which we would like to avoid. We would therefore to see further details of how potential conflict with towpath users will be managed.

The archways will be closed at night and out of hours. We would like to see details of how these will be gated, to avoid creating any recesses for anti-social behaviour, and graffiti. The towpath openings at the development of 30 Oval Road is a good example of how recesses and grills/gates can quickly become vandalised and unattractive.

If the Council is minded to grant planning permission, it is requested that the following conditions and informatives be attached to the decision notice:

Conditions

Risk Assessment

Prior to the commencement of development hereby approved, a Risk Assessment and Method Statement outlining all works to be carried out adjacent to the water must be submitted and approved

in writing by the Local Planning Authority in consultation with the Canal & River Trust. The development shall be carried out in accordance with this statement.

Reason: To ensure the proposed works do not have any adverse impact on the safety of waterway users and the integrity of the canal.

Details of Canalside Openings

Prior to the commencement of development hereby approved, details of the canalside openings must be submitted and approved in writing by the Local Planning Authority in consultation with the Canal & River Trust. Details shall include: the proposed gates and their positioning within the arches, lighting, and methods for reducing conflict with pedestrians and cyclists on the towpath. The development shall be carried out in accordance with the approved details.

Reason: To ensure the proposed works do not have any adverse impact on the safety of waterway users.

Informatives

"The applicant/developer should refer to the current "Code of Practice for Works affecting the Canal & River Trust" to ensure that any necessary consents are obtained (<https://canalrivertrust.org.uk/business-and-trade/undertaking-works-on-our-property-and-our-code-of-practice>)."

"The applicant/developer is advised that any encroachment or access onto the canal towpath requires written consent from the Canal & River Trust, and they should contact the Canal & River Trust's Estates Surveyor, Jonathan Young (jonathan.young@canalrivertrust.org.uk) regarding the required access agreement."

In addition, in order for the Canal & River Trust to monitor our role as a statutory consultee, please send me a copy of the decision notice and the requirements of any planning obligation.

Should you have any queries please feel free to contact me.

Yours sincerely,



Claire McLean
Area Planner - London

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