
THE VICTORIAN SOCIETY
The champion for Victorian and Edwardian architecture

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Your reference: 2015/6016/L; 2015/6015/P
Our reference: 2015/11/008

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Dear Ms Litherland

RE: Demolition of the existing roof structures of the Eastern Coal Drops (Grade II, *Lewis Cubitt*, 1851-2) and Western Coal Drops (1859-60) to facilitate the formation of a new roof-level extension

Thank you for consulting the Victorian Society on this application, which was discussed by our Southern Buildings Committee at its most recent meeting. I write now to convey their comments; we **object** to the proposals which represent an unnecessary level of harm to the listed building.

It is an innovative response to a desire for more space, though unfortunately the proposals pay no respect to the listed status of the Eastern Coal Drops, disfiguring the roofscape to the degree of substantial harm. It is proposed to demolish and rebuild the majority of the pitched roofs over both the Eastern and Western Coal Drops, warping them into something unrelated and of little relevance to the structures they cover. Key to the significance of the Coal Drops is their simple, industrial character and the Functional Tradition. These proposals turn them into something else. Furthermore, the Eastern Coal Drops are significant as probably the first of their kind where all of the functions were covered by an overall roof. The plain, pitched roof of the Eastern Coal Drops is therefore paramount to its significance. Not many fully enclosed coal drops were built – meaning that very few have survived. Conserving the earliest example of this arrangement, as close to its original appearance as is reasonably possible, should be a priority. The proposals would also have a dramatic impact on the Conservation Area, particularly views from Granary Square. The gasholders (no.8, Grade II, *John Clark*, 1883), which are one of the more striking features of this development, will be obscured. This is a considerable impact on the setting of a listed building.

The proposals are a departure from the approved outline planning permission (2004/2307/P). This is significant given how hard fought over the master plan was – one of the key issues was the treatment of the listed buildings and this was crucial to the approval of the scheme. Several designated heritage assets have been demolished that those that were retained were to be sensitively treated. To stray from this, in such a manner that causes undisputed harm to a listed building, is not a

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desirable departure. It must be entirely justifiable, which is not demonstrated in the full planning application since other options do not seem to have been explored.

This also raises the issues of why outline consent for a site that includes so many designated heritage assets, with detailed consents to follow later, was considered to be controversial at the time. The parameters for development have been set for the whole site, rather than individual plots. The additional floor space this application presents may be counted against the site-wide totals of the outline planning permission, but this means that the listed building is now facing a far larger intervention than what it was allotted. It is not acceptable that the listed building should now take on a greater proportion of the site-wide parameters; this is a serious variation of the consented conditions. Had this been proposed in the outline planning permission, central to which is the sensitive restoration of historic buildings, it is unlikely that consent would have been granted. This is why it is crucial that the master plan is adhered to.

It is suggested that the latest proposals are 'in line with the principles of the Outline Planning Permission'. They are not – the principles of the outline consent include the Initial Conservation Plans that were submitted for each heritage asset. For the Eastern and Western Coal Drops these were to be sensitively refurbished as indicated by the specification of works and the site-wide CGIs. The built heritage value of both structures was considered to be 'high' and 'very high' respectively. The proposals do not reflect this; the demolition of the majority of both roofs and canopies is sought. 'Roof trusses that typologically relate to others in the Goods Yard complex' are frequently cited with regard to the Coal Drops, now most are to be lost. In the outline planning permission, the importance of the canopy of the Western Coal Drops is specifically referred to. It is stated that 'suitably repaired, it would give identity to the building' and even the notion that canopies are too often lost when railway buildings are reused is mentioned. Despite being a later addition of 1897-9, it is a distinctive feature which conveys railway use; the canopy should be retained.

It is also asserted that the proposals have substantial public benefits, which outweigh the acknowledged harm to the heritage assets. The overall planning and public benefits submitted are all present in the outline planning permission, which saw the Coal Drops refurbished without the addition of an extra level. The benefits this scheme presents should strictly refer to the benefits that the extra level will bring. These are must be relatively minor and could be achieved in a less damaging scheme. We therefore recommend that consent for this planning application is **refused**.

Yours sincerely

Alex Bowring
Conservation Adviser