

THE REGENT'S CANAL CONSERVATION AREA ADVISORY COMMITTEE
31 OVAL ROAD, CAMDEN TOWN, LONDON NW1 7EA

Secretary: Anthony Richardson

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Jenna Litherland
Development Control
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London Borough of Camden
The Town Hall, 5 Pancras Square
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15 Dec 2015

BY EMAIL

Dear Ms Litherland

Coal Drops Yard, King's Cross Central, London N1C 4AB.
Planning applications 2015/6015/P, 2015/6016/L and 2015/6018/P

I have been delegated by the Regent's Canal Conservation Area Advisory Committee to prepare its response on the Coal Drops Yard proposals, and I deeply apologise for my delay in doing this.

1) In reviewing the conservation implications of this massive scheme, we have started with the fact that the scheme is strongly supported by English Heritage. Visually and in gaining public appreciation of these historic buildings, we can see that the roof changes have both pros and cons. In regard to the remodelling of levels, we accept that some adjustment is desirable to facilitate retail uses as already approved in the outline consent and for better accessibility. We considered that the considerable length of the two ranges should be able to accommodate the adaptation of parts while respecting the historical and archaeological integrity of other parts, towards the ends of both ranges, which seemed to be the message from pre-application presentations. However, after going through the application documents in detail we conclude that the proposals have gone too far, damaging or concealing the building's intrinsic heritage, and therefore some significant modifications are needed.

2) A particular concern is that the proposals would largely obscure rather than bring out the original function of the coal drops, so they would not fulfil the objective of better revealing and enhancing the buildings' significance. The buildings are of remarkable historical and archaeological importance and, although altered, there is much detailed evidence in the internal fabric to show their original character and how they worked, with trains of coal wagons travelling north to south upon railway tracks supported on beams at the upper level and depositing their loads into hoppers above the mezzanine level (which in the case of the WCD were suspended by rods from the cast-iron beams above – still a 3-level arrangement), the coal then being bagged up and taken away at yard level. Below rail level, the operations took place in rectangular cellular compartments. The evidence is not well addressed in the Heritage Statement.

The buildings' external form does not directly demonstrate the internal functions and the evidence particularly lies in the interiors. Unfortunately, while it is proposed to conserve much of the external form, the extensive nature of the proposed retail adaptations will leave very little of the internal evidence uncompromised. Thus, in the northern part of the ECD, where

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the brick cells survive intact, the alterations would leave only one full-height cell unaffected by extensive new openings destroying significant fabric (which the Heritage Statement glosses as 'substantially retained with limited interventions'). At the upper level there seems to be no proposal to reinstate the fire-damaged beams. At yard level, it is proposed to preserve one cobbled and kerbed floor of a cell (of which we believe several actually survive), but under glass so as not to impede retail operations, and that will relegate this feature to the status of an obscure relic. There is no mention of the reinstatement of salvaged fittings.

We therefore consider more effort should be made to present the coal drops aspects, at the expense if necessary of some retail space. From the increase in retail opportunity that the scheme creates, some reduction in the retail intensity locally should be well affordable.

3) Other concerns include

- the amount of disruptive foundation works that the added weight of the new upper structure will entail.
- major difficulties in interpreting the original rail and viaduct levels when seen externally from the north – more hints should be provided and more weight should have been given to such considerations in the architectural design.
- the removal of all but two pairs of the roof trusses in the WCD, so that no vista of roof trusses will remain in that building.
- the insistence on removing nearly all the exceptionally characterful blue granite setts in the Yard, except in some very limited areas. There seems to be ambiguity between setts lightly sawn and setts heavily sawn. There should be more attempt to reinstate substantial areas through the use of sawing
- the lack of mention of the hoist mechanisms that remain at roof level in the southern part of the ECD, which should be preserved in situ.

4) We know you are recommending approval of this scheme and it would probably be fruitless to express concern over the intensity of activity that the proposed uses will bring to a limited space, or the public relations stance that these are old and decrepit buildings that need to be jazzed up.

However, we have identified a range of matters where the proposals need looking at again.

Yours sincerely

Malcolm Tucker
for the Regent's Canal CAAC