

THE REGENTS NETWORK

secretary@regentsnetwork.org

A WATERWAYS RESPONSE TO THE OVERDEVELOPMENT OF BANGOR WHARF, NW1



LB Camden Planning Application Ref: 2017/1230/P – **OBJECTION**

A flawed application

1.1 This application is very similar to the previous rejected scheme Ref: 2016/1117/P, and as has been pointed out by many recent objectors, it unsurprisingly does not respond to the wide range of concerns about the defective previous application, nor does it adequately address the 18 reasons given by LB Camden for its rejection.

1.2 It is difficult to see the point of submitting an unimproved application, unless the developers considered that they are putting pressure on LB Camden by currently also lodging an appeal against the previous rejection. This used to be a more common practice a decade or more ago with the intention of coercing an authority to give consent for the new application in order to avoid the hassle and particularly the expense of an appeal on the original. This ploy became unacceptable and unworkable, and was considered to be a weak device that was intrinsically unsafe and readily challengeable. (The Planning Appeal Ref: APP/X5210/W/16/3165200).

1.3 On the face of it, rejection of this similar application is predictable. In any event, rather than putting LB Camden under pressure, it could have the opposite effect and strengthen the authorities' position at any planning inquiry as it will only reinforce the reasons for having turned the application down. It also draws attention to the developers' inept and weak approach to planning and governance, and gives rise to suspicions about the applicant's competence and integrity.

Substantial opposition

2.1 Just as with the previous application, this similar application has attracted a deluge of criticism and a long list of sound reasons for the development not to see the light of day. This is in spite of the applicant's agents recently stating that the 'format' of the new submission "meets the requirements agreed with officers during pre-application discussions" (*correspondence incorrectly dated 28 February 2016!*), although it does not confirm that the content of their application is now acceptable in policy terms.

2.2 The applicants also announce that as this new application is so similar to the previous one that they are entitled to claim that they do not have to pay the standard application fee to LB Camden!

Not a good neighbour

3.1 The many reasons for turning this application down greatly outnumber the limited and insubstantial support. There are serious concerns of the shortcomings identified in the basic concept of a bulky, over-dense development that will have a distinct negative effect on the surroundings due to its out-of-scale size and height which will



overshadow and dominate the locality, as well as being unsuitable for the setting of the conservation area and the Regents Canal.

3.2 Without taking anything away from the major issues of development and housing, and the unwelcome negative effect on local residents for the rest of their lives, the Regents Network considers that the important focus of the application site should be the Regents Canal, which is part of London's Blue Ribbon Network of waterways and waterspaces as featured in the Mayor's London Plan.

A clue in the name

4.1 There may be a number of reasons against using the Bangor Wharf for housing, but there are many more reasons for using the wharf as a wharf, which some may think is novel. They may be the ones who do not know that waterborne freight is now being promoted throughout London.

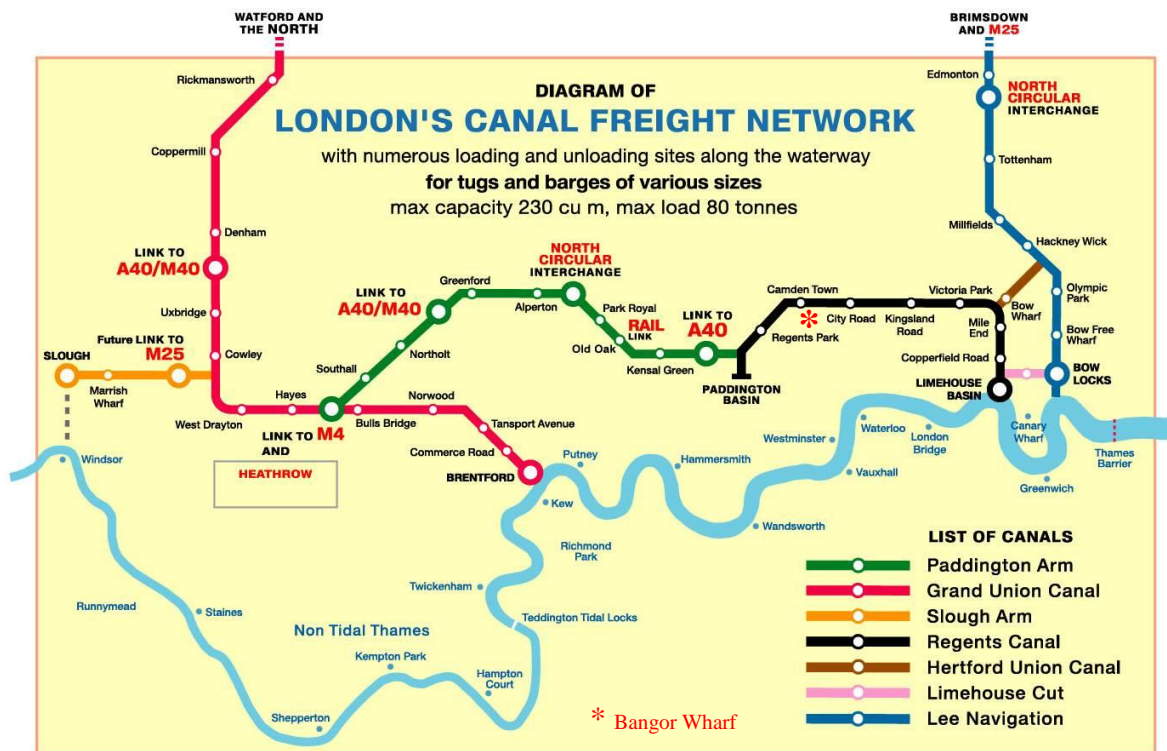
4.2 There is an emerging realisation that with the gridlock on the over-crowded roads, and the threat to life and health from road transport emissions, that the historic and well-tried transport network of over 100 miles of canals in London could be put to economic and beneficial use.

4.3 Bangor Wharf could again be used as a wharf, and it is in an ideal location in Camden Town with its proximity to central London, and with excellent road links.

21st Century Waterborne Freight

5.1 A localised waterway transport service is being set up to operate along the Grand Union Canal in West London. It will be focussed on the very busy Park Royal area where there are over 2,000 commercial companies providing a wide range of goods and services to Central London and the surrounding area. They are in need of urgent improvements to their transport services as the roads in the area are at capacity and often gridlocked while the local canal stands quiet and unused.

5.2 The businesses in Park Royal are working together to make good use of the Grand Union Canal that runs through their centre, and once this project is up and running, the water freight service will be extended to the Lee Navigation and the Regents Canal.



5.3 This is where a restored and upgraded Bangor Wharf would come into its own and could begin a new life as a local freight centre and collection point, as well as one of Camden's important and attractive features of the area.

A modern fleet

6.1 A new fleet of electric barges is being designed with the expertise of a team of UCL marine engineers, as well as provision of new handling equipment on the barges to load and off-load at the waterside. If lorries can have hydraulic cranes, so can barges, and the road freight operators are keen to see the canals back in use and are giving canal transport the benefit of their experience.



6.2 These days large wharves with cranes are not always needed, and a freight boat will be able to stop anywhere along the canals at a pick-up point where there is road access to deliver a pallet or collect some packages or push trolleys.



6.3 The project was set up by the GLA London Waterways Commission Freight Group, in association with the University College London Engineering Exchange, the Commercial Boat Operators Association and the Just Space Network, and with some very wide ranging support from an active group of waterway specialists and operators.

Transport for developments beside waterways

7.1 In the meantime, while the network freight project is being developed, the Regents Canal can be used from time to time as the need arises. This can certainly be a benefit to the property developments that are springing up along the Regents Canal, and demolition waste can be transported away by barge, and building materials delivered.

7.2 From time to time London's canals, including the Regents Canal, are transporting hundreds of tons of building material and waste without anyone noticing – its so smooth and quiet. It is also encouraged and assisted by the Canal and River Trust and this can be seen in their response to this planning application.

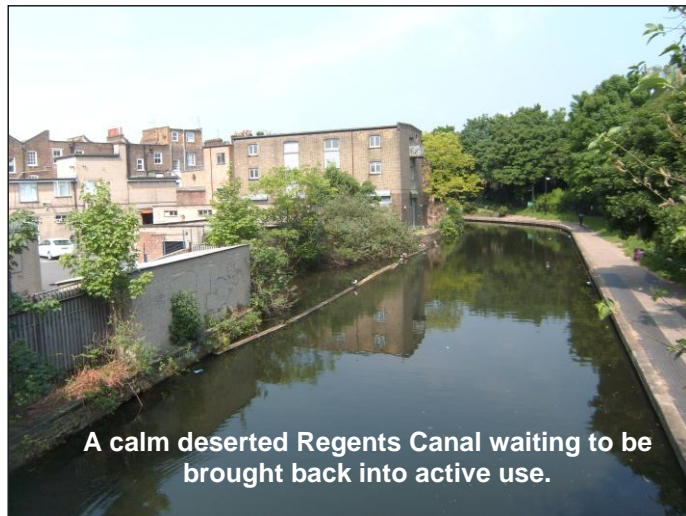
Bringing the waterways back to life

8.1 There is some strong promotion and support for waterborne freight nationally as well as locally. The government encourages water freight by offering grants for modal shift of freight from the roads to waterways, according to the tonnage transferred. This is backed up by the FTA Freight Transport Association, the national road lobby organisation, which has set up a modal shift centre in their organisation to promote this ‘working together’.

8.2 The DfT Department for Transport Freight and Logistics Division publishes useful information and statistics of waterborne transport. It has also produced a very detailed and comprehensive map of GB showing the river and canal routes throughout the country. The Regents Canal on this national designation chart is shown as a “key inland waterway of Great Britain with freight potential”. This is an important leading recommendation to be acted upon. (See Appendix A).

8.3 This top down promotion of water freight continues with the regional policies and recommendations in the London Plan. The Thames and London’s rivers and canals are designated as London’s Blue Ribbon Network (BRN) along with lakes, reservoirs and other water spaces. The BRN is accorded great importance to the capital, and there are a number of policies in the Mayor’s London Plan for development and promotion of freight transport on the extensive waterway network.

8.4 The recognition of the opportunity and benefit for water freight is also apparent at local level in the borough policies, and there are many references and requirements for the inland waterways to be more actively used. The Regents Canal is recognised in the LB Camden Local Plan and recommended to be used for transport of construction waste in particular, and there is no intention to restrict the wider use of barge transport although it is not actively promoted. However, there is a distinct notion that water freight should not be obstructed. Recognition by LB Camden that Bangor Wharf could be usefully operated as a wharf should gain significant support.



8.5 An important consideration is the emerging North London Waste Plan, in which the potential of the use of water transport is prominent. It could follow the West London Waste Plan by stating that contractors should give ‘active consideration’ to moving waste “by means other than road”, and the canals including the Regents Canal are there ready and waiting to be used.

8.6 Incidentally, water transport could assist in dealing with Camden’s continuing problem of disposal of food waste in sealed containers, which could be transported directly by canal to the waterside Edmonton waste management centre, rather than inconveniently by road, and opportunities such as Bangor Wharf should not in that case be precluded by being built on.

A National asset

9.1 The Regents Canal is a section of the national canal network of about 3,000 miles of an extensive man-made construction, the majority of which is about 200 years old or more. This substantial network is not designated as yet as a national monument, however it is recognised and treasured as a significant national asset.

9.2 The short section of the Regents Canal with its historic environs such as Bangor Wharf is part of that national asset and should be treated with great care and respect, and LB Camden has the responsibility, nationally, to see this is carried out. It is a great responsibility. When considering development and changes to the national canal network and its setting, the canal and its long term future are paramount.

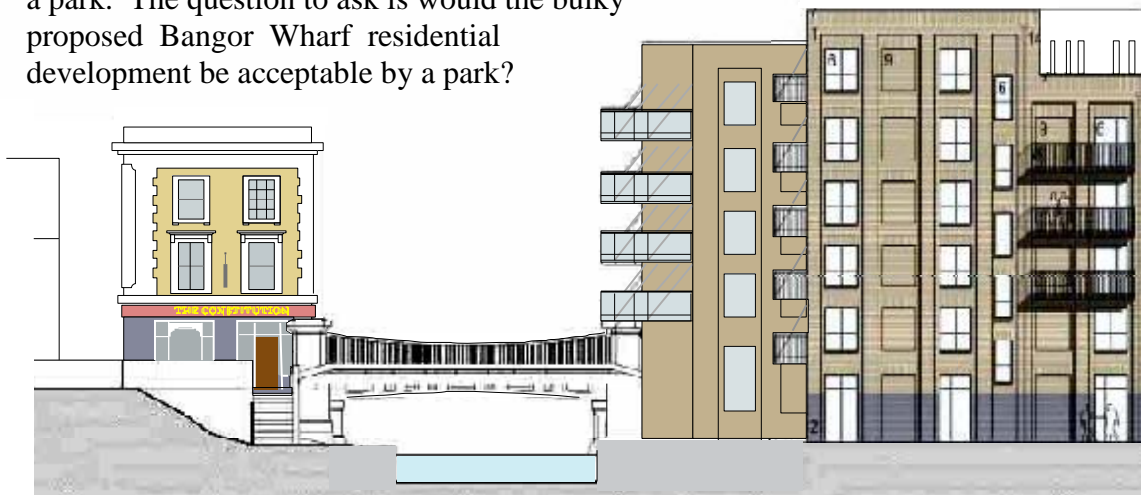
9.3 In that connection it should be noted that a residential development can be sited in a wide variety of locations anywhere, but an integral waterway facility such as a wharf obviously must be waterside. In the case of the current application, a wharf such as Bangor Wharf will be of greater long term benefit to the Regents Canal and the national canal network than a block of flats. This is certainly not appreciated by the applicants, but must be taken fully into account by LB Camden.

Regents Canal Conservation Area

10.1 Camden's Regents Canal Conservation Area is of great importance to residents of the borough (and visitors) as it raises the profile of the wonderful facility that they are fortunate to be able to visit and enjoy. The canal is sensitive to how it is surrounded and enclosed, and it still can be a pleasure to visit and benefit from the calm haven away from the bustle of the active neighbourhood, and the traffic.

10.2 Unfortunately the frenzy of excessive building development along the waterway has spoiled a number of stretches of the Regents Canal (and other London waterways including the Thames) and the charm and peace does not prevail. It is essential that the stretch of the Regents Canal in the vicinity of Bangor Wharf is not similarly spoiled by overbearing and bulky residential blocks.

10.3 The Regents Canal and all London's waterways are designated as 'open space' in the London Plan, and as such have the same degree of consideration and protection as a park. The question to ask is would the bulky proposed Bangor Wharf residential development be acceptable by a park?



The answer is obviously a resounding 'no' as it is dominating and overbearing being right up to the edge of the canal. Smaller and less aggressive buildings such as the Constitution Pub may live perfectly as a good neighbour to the heritage waterway.

10.4 With such a negative effect, it can be seen that the canal would be far better off without the building, and the current open space character of a wharf would be more acceptable - and more in accordance with policy. Also, the trend for aggressive and prominent balconies has ruined many streets and neighbourhoods around London, and

most of them stand empty and ugly. The most practical balconies are internal with the flats, and provide a much more useful and integrated space for the residents. Waterside developments (including on the Thames) should not have protruding balconies.

Potential heritage loss

11.1 Another downside of the proposed building is the loss of heritage assets such as the original cobbled areas which could be retained usefully if the site continued to be used as a wharf. Also the heritage rag stone canal retaining wall would be replaced by the developers, or disfigured with sheet piling as with the nearby Lawsons Wharf site. On the other hand, with some stabilising and repair the historic wall could stand there for another 200 years in daily use as a wharf. There are not many good examples of these canal walls left intact. What a bonus that would be.

11.2 Yet another disappointing decision with the proposed developer is the removal of the large weeping willow beside the Grays Inn Bridge, and which has become a main feature in the area. The Tree Report states that the willow has advanced rotting, which could be an excuse for disposing of it. However, it need not mean its demise if it can be restored to health and propped up. If the worst comes to the worst, then it can be replaced with a tree, rather than a gross building, and be a welcome asset to the wharf.

11.3 The heritage 1897 Grays Inn Bridge would be compromised by the proximity and overbearing bulk of the proposed development, just as it has been previously with the very poor decision to allow the building on the south side to be very close up to the bridge abutment. In spite of that, the bridge stands proud and is a fine feature.

SUMMARY

There are no fine features of the proposed building development on our Bangor Wharf, and the planning application is strongly opposed, just as it was the first time around. The changes since the proposal was rejected are minimal – there are 6 fewer residential units, a slight increase in office and commercial space, fewer affordable units, a roof terrace and more of the dreaded balconies! The bulk and overshadowing is unchanged.

The design and look of the blocks (and their grotesque balconies) is unacceptable, and not the sort of bulky edifice anyone would welcome in their neighbourhood. The architectural quality and standard is very mundane, as with many of the developments sprouting up around London. Development is not opposed, but poor development is.

This proposed development takes from the Regents Canal, but gives nothing back.

There are compelling reasons for using Bangor Wharf for what it was intended, as a wharf, and revival of water freight on London's canals will be most welcome.

The Regents Canal has only been without significant freight transport for 25 years in its nearly 200 year existence, and it would not take much for it to be brought back to life.

The character of the Regents Canal as a quiet haven needs to be protected. Movement of boats, even freight barges, could add greatly to the life and attraction of the canal itself.

The ever popular electric beer boat with its daily deliveries on the waterways of Utrecht in the heart of the Netherlands



DfT DEPARTMENT FOR TRANSPORT

KEY INLAND WATERWAYS OF GREAT BRITAIN WITH FREIGHT POTENTIAL

