



Canal &  
River Trust

7th December 2017

Ms Jennifer Walsh  
Camden Borough Council  
2nd Floor  
5 Pancras Square  
C/o Town Hall  
Judd Street  
London  
WC1H 9JE

Our Ref CRTR-PLAN-2017-23676  
Your Ref 2017/6011/P

Dear Ms Walsh,

**Proposal:** Demolition of the existing pavilion visitors centre (Class D1) and rebuild a new centre (Class D1) with associated ancillary visitors Café (Class A1/A3) and enhanced landscaping across the site

**Location:** 12 Camley Street Natural Park, Camley Street, London

**Waterway:** Regent's Canal

Thank you for your consultation.

The Canal & River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales. We are among the largest charities in the UK. Our vision is that "living waterways transform places and enrich lives". We are a statutory consultee in the development management process.

The Trust has reviewed the application. This is our substantive response under the Town and Country Planning (Development Management Procedure) (England) Order 2015.

The Trust has the following general comments to make:

#### Heritage and Design

This proposal does not pretend to make any reference in its design to the language of either the extant industrial structures on the opposite side of the canal, or those of the coal depot that formerly occupied the application site. The Design and Access Statement does, however, acknowledge the value of views to the historic buildings opposite, and declares an intent to open these up for the benefit of visitors.

The application site commands a particularly visible position on the outside of a 90-degree bend of the Regent's Canal, which could potentially affect the historic setting, of both the waterway itself and surviving industrial buildings adjacent to it. Given the departure from

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industrial/urban character previously made by the creation of the Camley Street Natural Park, the proposal strikes me as offering opportunities for visitors to reflect on the dramatic changes wrought to an essentially rural/agricultural landscape by the construction of this section of the canal in 1816-20 and the ensuing development along its banks, the culmination of which is best appreciated in Stanford's map of 1886. The tortuous bends both here and further north reflect the political struggles of the waterway's promoters to secure ownership of a viable route, so their legibility is essential to this story. The application seeks to capitalise on the open views onto the waterway. We would therefore suggest that there may be an opportunity for the incorporation of interpretation, developed in partnership between the applicant and the Trust's Environment team, to consider how the environment of the waterway was adversely affected by rapid industrialisation in the 19th century then enhanced from the late 20th century with its potential as a leisure amenity and ecological asset being recognised. Such interpretation would help anchor the Natural Park into wider environmental narratives relating to the Regent's Canal and the environmental aims of the Trust, as well as providing a mechanism for explaining the rationale for our strategic protection of the setting of the waterway in our role as statutory consultee.

#### Land Contamination and Drainage

Although the Application Form states that there is known & suspected land contamination, the Ground Investigation Report provides very limited data on soil quality (i.e. pH, nitrate & sulphate). There is no groundwater quality data submitted. In the operational phase of the development, we could potentially accept surface water discharges from the site, subject to a formal agreement with our Utilities team (I have suggested an informative, below). However, during the demolition and construction phase the Trust will need to adopt a precautionary approach in the absence of adequate data on soil and groundwater quality. We would require the following:

- That no surface water (either via drains or surface water run-off) or extracted perched water or groundwater are allowed to be discharged into the Regent's Canal during the demolition/construction works;
- That any stockpiles of soil from the site are located at a suitable distance away from the Regent's Canal and suitable methods are used to minimise dust emissions from the site during demolition/construction;
- If it is found that there are any surface water drains connecting the site with the Regent's Canal that these be immediately capped off at both ends for the duration of the demolition & construction works – i.e. at the point of surface water ingress and at the canal outfall.

#### Water Source Heat Pump

There is to be a water-sourced heat pump installed – we have no objection to the principle of this on the basis that it is to be used to heat the building and will therefore result in the

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discharge of cooler water than was abstracted from the canal. However, the applicant will need to apply for formal consent for this from the Canal & River Trust Water Development team (I have suggested an informative below).

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

**Informatives**

*"The applicant/developer is advised that the proposed installation of a water source heat pump will require written consent from the Canal & River Trust, and they should contact the Canal & River Trust's Water Development Team, Stephen Bailey ([REDACTED]) regarding the required agreement."*

*"The applicant/developer is advised that any surface water drainage into the Regent's Canal will require written consent from the Canal & River Trust, and they should contact the Canal & River Trust's Utilities Team, Liz Murdoch ([REDACTED]) regarding the required agreement."*

*"The applicant/developer is advised that any encroachment into, or access over the waterway requires written consent from the Canal & River Trust, and they should contact the Canal & River Trust's Estates Surveyor, Jonathan Young ([REDACTED]) regarding any required access agreement."*

*"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>)."*

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.

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

Yours sincerely,  
**Claire McLean MRTPI**  
**Area Planner - London**

[REDACTED]

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[REDACTED]

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