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FAO: Laura Dorbeck

7 October 2021

Our ref: LJW/NFD/AKG/AJA/J10115

Your ref: PP-10225017 and PP-10224971

Dear Laura,

Provender Store and Long Stables Building, Stables Market, Chalk Farm Road, Camden NW1 8AH

Application for Full Planning Permission, Listed Building Consent and Advertisement Consent

We write on behalf of our client, Camden Market Estate Holdings Limited, to submit an application for planning permission, listed building consent and advertisement consent at the Provender Store and Long Stables Building, Stables Market, Chalk Farm Road, Camden NW1 8AH ('the Site') for the:

"Installation of new wayfinding signage for the Provender Store and Long Stables Building and associated new lighting. Installation of safety equipment to the north elevation of the Provender Store."

Site and Surroundings

The site is located within the London Borough of Camden (LBC). The Site is defined as a Camden Town Centre location.

The Site is located with the Stables Market in the northwest corner of Regents Canal Conservation Area. The Long Stables Building and Provender Store are towards the eastern edge of the Stables Market. The Provender Store comprises ground plus two upper floors and the Long Stables comprises ground plus one upper floor.

The Provender Store and Long Stables Building (the Site) are part of a group Grade II listing. There are several other listed buildings located within the Stables Market, the listed Grade II* Horse Hospital Building and the wall boundary wall running along Chalk Farm Road which is also Grade II* listed.

Background

The upper floors of the Provender Store have been vacant after being affected by a fire in the adjacent railway arches in 2014. Since then, the Provender Store and the Long Stables Building have been the subject of thorough refurbishment including extensive roof and joinery repairs, upgraded mechanical and electrical installation, and cleaning and repointing of historic brickwork.

Listed Building Consent (ref: 2015/4302/L) was approved on 10 November 2015 for the **“Installation of 5 x projecting signs at fascia level and 2 x lettering signs to upper level to east elevation (Tack Room); 5 x projecting signs at fascia level, 3 x board signs to ground floor level and 4 x lettering signs to upper level to north elevation, 5 x projecting signs at fascia level, 5 x board signs to ground floor level and 6 x lettering signs to upper level to south elevation, and 1 x board sign to ground floor level to west and east elevations (Lanverder Store); 1 x board sign to ground floor level to south and east elevations, 1 x projecting sign at fascia level and 1 x lettering sign to upper level, and 2 x board signs to ground floor level to north elevation, 1 x lettering sign to upper level, and 1 x board sign to ground floor level to west elevation (Long Stable); 10 x display boards to outer walls (Horse Hospital); 7 x projecting signs at fascia level to upper floor and 8 x board signs at ground floor level to south elevation, 1 x board sign to west elevation (Chalk Farm).”**

More recently, planning permission (ref: 2018/1851/P) and listed building consent (ref: 2018/1893/L) were approved in September 2018 to change the use of part of the Provender Building to office use and associated works.

Planning permission (ref: 2020/5969/P) and listed building consent (ref: 2021/0060/L) were approved on 16 February 2021 for the:

“Installation of 5 grilles to the south elevation and internal works including the installation of market shop units, a lift, two new staircases, new WC facilities, lighting and services and the removal of redundant services, associated with the use of the building for market retail use.”
The retailers from the basement of the Atrium building have since been relocated to the Provender Stores.

A full list of the planning history can be found on page 9 of the Design and Access Statement.

Proposals

The proposed works are designed to enhance the historic character and pedestrian experience of the buildings and increase legibility and wayfinding within the market through the introduction of signage and lighting.

The intention is to unify the market's identity and the historic character of the site with a strategic approach to signage and wayfinding. This has been designed as a series of interventions with approved lighting fixtures, electronic fittings, and signage. It will allow a cohesive approach in the way we advertise and encourage access to the historic buildings without obstructing their appreciation. The proposals also include a sound beacon as part of the fire strategy for Provender, considered essential for the safety of the visitors, tenants, and the buildings.

The proposed methods of signage would include modular directional signs, place name signage, hero lettering signage, entrance lettering signage, hero hand-painted signage and projecting hanging signage. Full details of which can be found in the Wayfinding Document, prepared by LabTech.

All signs are traditional both in terms of material and style. The proposed directional wayfinding is to be modular black metal signage with white text applied, hung from / fixed to guide rails. This allows for flexibility and ease of adding and removing sections.

New signage and wayfinding strategies are important for safe travel around the market as well as an enhanced visitor experience. A new wayfinding strategy has been developed through route analysis with consideration of user experience and historical use of signage in the area.

The improvements will help support the use and maintenance of the Provender Store and Long Stables Building, preserving their valuable heritage. This is seen as being beneficial to the visiting public, market traders, and supporting the long-term success of the market.

The Applicant is looking at a project to review the whole wayfinding strategy across the Stables and Camden Lock Markets. An extensive analysis of the wayfinding options in the proximity of the listed buildings has been carried out and it was considered that the proposed system will fulfil the objectives of guiding visitors through the market and particularly towards the upper floors while achieving minimal intervention of the historic fabric. The proposals are therefore submitted for consideration of continuous installation.

A separate application for wayfinding across the Camden Markets will be submitted in due course.

The proposals also include a sound beacon as part of the fire strategy for the Provender Store, considered essential for the safety of the visitors, tenants, and the buildings. The proposed sound beacon is small and discretely located fixed to the facade through the mortar joints on the north elevation and will be fixed into the facade through mortar joints. The beacon would only sound in the event of an emergency.

The beacon is necessary as on the 19th of May 2014, a fire broke out in Provender resulting in substantial damage to the South Elevation. Consequently, a rigorous fire strategy has been developed to protect tenants, visitors, and the building from future fires. A key part of the fire prevention strategy is an external warning system using an open area sound beacon to alert the Market Management Team of the risk of a fire. Only a single beacon is required as part of this strategy, which has been strategically located in a discreet position on the north elevation of The Provender Stores.

The proposed works are set out in greater detail within the Design and Access Statement, prepared by LabTech.

Pre-application Discussions

A pre-application meeting was held with Planning and Design Officers in August 2021.

The comments received can be summarised as follows::

- The amount of new signage;
- Method of fixing of the modular directional signs to the building façade;
- The amount of proposed new lighting;
- Concerns that the ground-up lighters would impact the cobbles; and
- A lack of wholistic wayfinding for the Markets as a whole.

In response to the above points, a series of changes have been proposed to respond to Officers comments.

The applicant has reviewed the signage proposals against the wayfinding analysis and streamlined the amount of signage being proposed. This has resulted in the removal of 1x direction signage, 2x hanging planters and the entrance painted signage.

The remaining signage has been reviewed, resulting in a scaled-down response LB Camden's concerns. The text in the large Hero-painted signage on the gable end of The Provender Stores has reduced from 449mm to 438mm and the height of the remaining 3 direction signs has been reduced from 3020mm to 2480mm.

To protect the historic fabric, the proposed fixing of the directional signage to the listed building has been altered so there are only 2 fixing posts per signage. This is considered a minimal intervention that allows updating the content of the wayfinding over time without further intervention to the historic fabric of the building.

The amount of lighting proposed has been significantly reduced, and the ground up-lighters from the proposals in direct response to the comments received. This ensures the listed cobbles are retained whilst reducing the amount of lighting proposed overall.

Local Development Framework

The London Borough of Camden's Local Development Framework comprises of the following planning policy documents: The National Planning Policy Framework (2021), the London Plan (2021) and the Camden Local Plan (2017).

In addition, supplementary planning documents relevant to the proposals include the Regent's Canal Conservation Area Appraisal and Management Strategy (2008).

Statutory Legislation

Statute regarding the heritage environment is relevant to this application. Both the site's historic fabric and the surrounding environment have been carefully considered in the development of the proposals having regard for the statutory legislation set out below.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that local planning authorities should pay special regard to the desirability of preserving a listed building or its setting or any features of historic or architectural interest which it possesses when considering applications.

Section 72 of the same Act states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

Planning Considerations

Heritage, Design, Signage and Lighting

Camden Local Plan Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. In order to maintain the character of Camden's conservation areas the council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. The Council will also resist development that would cause harm to significance of a listed building through an effect on its setting or would cause harm to its special architectural and historic interest.

Camden's Advertisements CPG (2018) and Local Plan Policy D4 require all advertisements and signs should respect the form, fabric, design and scale of the host building and setting. All signs should

ensure that they serve as an integral part of the immediate surroundings and be constructed of materials that are sympathetic to the host building and the surrounding area.

Local Plan Policy D4 states that Camden will support advertisements that:

- a) preserve the character and amenity of the area; and
- b) preserve or enhance heritage assets and conservation areas.

The Provender Stores and the Long Stable are part of a group listing. As such, their main value is placed on their historic and architectural contribution to the complex to which they belong. The interior of the buildings has been largely altered and stripped of original features. The significance of the stables complex is considered high, given the role the buildings played during the commercial expansion through the canal and railway, and later on as a world-renowned market.

The new signage and wayfinding proposals have been designed to respond to the market's character and the historic character of the Site to advertise and encourage access to the historic buildings without obstructing their appreciation. Architectural lighting has been designed to aid the wayfinding strategy and enhance the architectural character of the buildings.

The proposed fixing of the modular directional signs to the mortar joints has been reduced to only two points per signage to reduce the impact of the proposed signage on the historic fabric. This is considered minimal intervention of the historic fabric and will allow the content of the wayfinding to develop over time.

Listed Building Consent (ref: 2015/4302/L) was approved in 2015 which sought to enhance the visible wayfinding signage and the character of the Stables Market with carefully designed interventions including architectural feature lighting among others. This permission permitted the use of letters up to a maximum dimension of 220mm x 220mm. The signage proposed under this application has larger individual letters attached to mortar joints only to 260mm. The reason for this is based on the applicant's previous experience, where the signage cannot be properly identified if under a certain size.

The Lighting Strategy, prepared by Light Bureau provides details of the lighting for the signage and LabTech have prepared a signage document which sets out the details all the proposed signage.

The signage proposals are required to improve wayfinding and legibility within the market. The proposals are sensitive and appropriate to the surrounding context and historical nature of the site and have been reduced in quantity following Officers feedback. Signage has always been part of the history of the area and this strategy builds on this rich history.

The lighting strategy is minimal and has been reduced following feedback from Officers and works to highlight the architectural features of the heritage buildings within the market. It has been designed to enhance the wayfinding strategy, legibility, architecture, and safety of the market benefiting both the visiting public and market traders which will secure their long-term optimum viable use, supporting the market economy in line with local and regional policy.

The proposed design will increase the legibility in this area of the market, increase safety and promote further investment in the listed buildings which will secure their long-term optimum viable use. The proposed design will also support night-time activity on the site, which will support the market economy in line with Camden Local Plan Policy TC6 and GLA objectives within the Understanding London's Market Document. The signage design also reflects heritage signage as demonstrated in the earlier parts of this document.

In line with NPPF paragraph 202, the proposals will deliver the following public benefits:

- i. Wayfinding will be improved as part of the proposals, which will make it easier to navigate the market and improve pedestrian flows;
- ii. The addition of lighting will help to celebrate the historic fabric of the listed buildings and will improve public safety and make the market more attractive to use in the evening;
- iii. Providing an external warning system to alert the Market Management Team of the risk of a fire which will improve public safety;
- iv. The improvements will help support the use and maintenance of the Provender Store and Long Stables Building, preserving their valuable heritage;
- v. Supporting the tenants of the market by generating footfall and improving customer navigation around the market; and
- vi. Supporting LabTech's objective to regenerate and revitalise this area of the Camden Town Centre for the long term.

The sound beacon has been strategically located in a discreet position on the north elevation of The Provender Store to reduce the visual impact of the proposals.

The proposals are considered to comply with relevant national and local planning policy and meet the statutory tests of Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposed signage and design is also in line with Camden Local Plan Policy D4 as it will preserve the character and amenity of the immediately surrounding area in Camden town centre and will preserve and enhance the both the nearby listed building and the conservation area.

Amenity

Local Plan Policy A1 seeks to protect the quality of life of occupiers and neighbours through ensuring their amenity is protected. Noise is a factor that will be considered to protect the local amenity of communities, occupiers and neighbours.

Local Plan Policy A4 seeks to ensure that noise and vibration is controlled and managed. Planning permission will not be granted for development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.

An emergency sound beacon is proposed as part of the development, which will sound an alarm in the event of a fire. The sound beacon is a key part of the fire strategy for Provender and essential for the safety of the visitors, tenants, and the buildings. The beacon has been strategically located in a discreet position on the north elevation of The Provender Stores and will only be used in the event of a fire. Therefore, since the beacon will be used extremely rarely, if at all, this will protect the existing amenity of local occupiers and neighbours in line with Local Plan Policy A1 and A4.

Enhancing the Stables Market

Local Plan Policy TC2 states Camden will seek to protect and enhance the role and unique character of each of Camden's centres and will seek to provide for and maintain, a range of shops including independent shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice. Local Plan Policy TC6 states that the Council will consider the character of the existing market when assessing proposals for the refurbishment and redevelopment of markets.

The proposals are in line with Camden local policies TC2 and TC6 as they will support and improve the continued function of the Site within the Stables Market. The improved signage and lighting will therefore enhance the vitality and activity within this part of the market. The signage and lighting will help increase footfall within the market and improve circulation and help attract a wider range of visitors to different parts of the market which will help contribute to securing the Stables Market's long-term future.

Conclusion

It is considered that the proposals represent a sensitive treatment of this site within the context of the listed building and will result in the preservation of its historical significance. The proposed works will contribute to and support the success of the wider Stables Market and will preserve the character and appearance of the Regent's Canal Conservation Area.

The proposals comply with the required planning policy and meet the relevant statutory tests as the proposals would result in no harm to the heritage asset. Planning permission and listed building consent should therefore be granted.

Application Documentation

Please find enclosed the following documents in support of this application:

- Application forms and notices;
- Site Location Plan;
- Community Infrastructure Levy Form, prepared by Gerald Eve LLP;
- Design, Access and Heritage Statement, prepared by LabTech;
- Existing and proposed plans and elevations, prepared by LabTech;
- Lighting Strategy, prepared by The Light Bureau;
- Wayfinding Strategy, prepared by LabTech; and
- Multi-Tone Open Area Alarm Devices, prepared by Apollo.

The requisite application fee (**£696**) has been paid online.

We look forward to your confirmation of the validation of this application. In the meantime, please contact Anna Gargan or Andrew Jackson of this office should you have any questions.

Yours faithfully,



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