



**Canal &
River Trust**

Making life better by water

Camden Borough Council
Regeneration and Planning Development
Management
London Borough of Camden
WC1H 9JE

Your Ref 2021/6222/P

Our Ref CRTR-PLAN-2022-34955

8th February 2022

Dear Ms Walsh,

Proposal: Creation of pedestrian and cycle bridge over the Grand Union Canal, linking Granary Street and Camley Street spanning from 2-6 St Pancras Way to 103a Camley Street

Location: Proposed Bridge over Grand Union Canal, 2-6 St Pancras Way to 103a Camley Street, London

Waterway: Grand Union Canal

Thank you for your consultation on the above application.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The Trust has always maintained some concern regarding the need of this footbridge, considering the proximity of the existing Camley Street road bridge. However, the Trust was also consulted through the pre-application stage and acknowledges the amendments seeking to address some of our concerns. The main issues relevant to the Trust as statutory consultee on this application are:

- a) The impact on the structural integrity of the Regent's Canal and its towpath, and navigational safety
- b) The impact on the character and appearance of the Regent's Canal Conservation Area
- c) The impact on the adjacent moorings
- d) The impact on the ecology of the Regent's Canal

Based on the information available our substantive response, as required by the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as amended), is to advise that suitably worded **conditions are necessary** to address these matters. Our advice and comments follow:

- a) The impact on the structural integrity of the Regent's Canal and its towpath, and navigational safety

The proposal would appear to provide adequate draft above the water level and towpath as advised in the Trust's Code of Practice (link below, under suggested informatives) and has been reviewed by the Trust's engineers. We would request that an informative requiring ongoing compliance with our Code of Practice be attached to ensure

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that there is appropriate ongoing communication with the Trust's engineers. We would also request a planning condition requiring a waterway wall survey of both sides of the canal, adjacent to the proposed abutments, to ensure that there will be no adverse impact on the structural integrity of the Regent's Canal from the proposed works. I have also suggested a Risk Assessment and Method Statement be submitted, as a requirement of a condition attached to the decision, to ensure the safety of other canal and towpath users.

e) The impact on the character and appearance of the Regent's Canal Conservation Area

The bridge deck itself appears well designed and elegant, but we consider that a long stretch of the canalside is sterilised by the proposed approach ramp. The height of the offside wet approach wall has been lowered following the Trust's concerns about the large length of blank abutment, which has helped to reduce its visual impact, but we feel that this is still a potential issue. We recognise that, without pulling the building line of the adjacent approved scheme back, there is little space to accommodate a meaningful waterside space between the water and the abutment that will not become a potential site for antisocial behaviour.

We would therefore suggest that the brickwork finish (bond, texture etc) of this abutment wall should be further detailed, through a planning condition, which would help to add some visual interest and animation. This could also include details such as greening or other detailing to help minimise the visual impact. I have suggested a condition at the bottom of this letter regarding this.

It would appear that the proposed bond of the brickwork, which is shown indicatively but is not explicitly stated, would be stretcher bond. We consider that there is an opportunity to echo the prevailing English bond of the retaining wall at the rear of the towpath, and this would enhance the design of the proposal.

Roadside seating is not ideal place-making here, although we are pleased to see that some animation and use is being considered around the bridge landing and canalside, and note that some stepped seating is proposed slightly further west.

We have concerns about the space between the edge of the canal wall at the bottom of the side seated steps descending from the NW lower ramp section on the offside – although this is not a through route, there is a very small distance between the steps and the water, we would suggest this needs rethinking for safety and a wider space engineered here.

Greening the ramp and wall through planting would also help to soften its impact. There may be some opportunity for floating ecosystems along the offside to be included to help with this, and to compensate for the permanent shading of the canal. However, any proposals for further structures within the Trust's waterspace will need careful further consideration and appropriate agreements.

a) The impact on the adjacent moorings

The occupants of the adjacent offside mooring site should have also been consulted on this current planning application. We understand that an earlier pre-application presentation was shared with them in 2020, and that they received this with the acceptance that while they would prefer a new bridge not be installed, they acknowledged the design had been improved to avoid oversailing of the mooring site, which would otherwise have made it unacceptable. I am not aware of their views on the current proposal. Any security and privacy issues for the moorings should be given due consideration.

a) The impact on the ecology of the Regent's Canal

The ecological appraisal submitted as part of the application is rather limited and references a bat survey undertaken 7 years ago (2014). It does not highlight the importance of the Regent's Canal as a SINC site.

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The bridge is likely to impact canal ecology (although this was not considered in the appraisal), as it will permanently shade a section of the SINC. This could be mitigated through ecological enhancements in the landscaping of the bridge, and could potentially include some intervention within/along the waterspace, subject to further assessment and consideration of the appropriateness of this with relevant teams in the Trust.

Lighting

The Regent's Canal is a prolific bat foraging and commuting corridor, and therefore no lighting proposals which will adversely impact bats, or other wildlife, will be accepted. All lighting on, under or surrounding the bridge must be <5 lux warm white/red (we suggest Phillips "bat friendly" lighting), with no light spill over the water surface, or up into the air space (i.e. the bat commuting and foraging corridor). We would like to see a lux plan accompanying lighting details that confirms this. The Bat Conservation Trust guidance provides advice to ensure proposals do not adversely affect nocturnal wildlife on the canal. The submitted ecological appraisal did make positive suggestions for lighting which should be adhered to - i.e. low lux (<5lux) warm white spectrum lighting specification for any and all bridge lighting, there must be no spill over the canal surface or into the air space, and that lighting must be directional and deflected.

We note that light fittings are indicated on the wall at the back of the towpath, and the lighting strategy would require further assessment by the Trust's Environment team. We would need to see more specifications and a lux plan to show the proposed light spill over the waterspace. We note that some lighting may have been installed along this wall without consultation with the Trust, and which may not be appropriate, so this should not be seen as a precedent. We therefore request a lighting condition be attached to the decision notice, should permission be granted.

If the Council is minded to grant planning permission we would also ask that the following conditions and informatives be attached to the decision notice:

Conditions

Risk Assessment and Method Statement

"Prior to the commencement of the development hereby permitted, a Risk Assessment and Method Statement outlining all works to be carried out adjacent to the water, and moorings, must be submitted to and approved in writing by the Local Planning Authority, and implemented as agreed. Reason: To ensure that the works have no adverse impact on the adjacent moorings or other uses of the towpath and waterspace."

Waterway wall survey

"Prior to the commencement of the development hereby approved, a survey of the condition of the waterway walls on both the north and south side of the canal, in the vicinity of the proposed abutments, and a method statement and schedule of works identified shall be submitted to and approved in writing by the Local Planning Authority. All repair works required to ensure that the structural integrity of the canal walls is protected during construction and operational phases of the development shall be carried out in accordance with the agreed method statement and repairs schedule, by a date to be confirmed in the repairs schedule. Reason: To ensure that the structural integrity of the Regent's Canal is retained."

Landscaping

"Prior to the commencement of the development hereby permitted, full details of the proposed landscaping scheme shall be submitted to and approved in writing by the Local Planning Authority. The landscaping scheme should include reference to plant species types, surface treatments (including on the southern abutment wall),

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any signage and information boards together with the means of on-going maintenance. The approved landscaping scheme shall be implemented by the first planting scheme after the development commences. Reason: To ensure the character of the Regent's Canal is retained, and to maximise biodiversity benefits."

Lighting

"Prior to the occupation of the development hereby permitted, full details of the proposed lighting and any CCTV scheme, including a lux plan of the proposed light spill, and details of operation and ongoing maintenance, shall be submitted to and approved in writing by the Local Planning Authority, and implemented as agreed. Reason: To ensure that there are no adverse impacts on the adjacent moorings or the ecology of the Regent's Canal."

Informatives

"Access to, and oversailing of, the Canal & River Trust's land and water during the construction and operation of the development must be agreed in writing with the Canal & River Trust before development commences. Please contact Bernadette McNicholas in the Canal & River Trust's Estate Team at Bernadette.mcnicholas@canalrivertrust.org.uk to discuss the necessary agreements."

"The applicant/developer should refer to the current Canal & River Trust "Code of Practice for Works affecting the Canal & River Trust" to ensure that any necessary consents are obtained, and liaise with the Trust's Third Party Work's Engineer: <http://canalrivertrust.org.uk/about-us/for-businesses/undertaking-works-on-our-property>."

"Any surface water discharge to the waterway will require prior consent from the Canal & River Trust. Please contact Liz Murdoch from the Canal & River Trust Utilities Team (Liz.Murdoch@canalrivertrust.org.uk)."

For us to monitor effectively our role as a statutory consultee, please send me a copy of the decision notice and the requirements of the planning obligation.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Claire McLean MRTPI
Area Planner London

Claire.McLean@canalrivertrust.org.uk

<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

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