



Historic England

Mr David Fowler
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Direct Dial: 0207 973 3777

Our ref: P01545553

4 October 2022

Dear Mr Fowler

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

CAMDEN LOCK MARKET CHALK FARM ROAD LONDON NW1 8NH

Application No. 2022/3853/P

Thank you for your letter of 14 September 2022 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Summary

Historic England welcomes the proposed works to the Interchange Warehouse, Dead Dog Basin and the buildings around the West Yard.

We consider the proposed observation wheel to have a harmful impact on the significance and setting of numerous heritage assets, particularly the Grade II Interchange Warehouse and the Regent's Canal Conservation Area. We acknowledge that these proposals are of a temporary nature, but will still need to be considered in the light of planning policies.

Significance of the historic environment

The site is located in the Regent's Canal Conservation Area and comprises the western part of the former Camden Goods Depot. The depot was established by the London and Birmingham Railway in 1841 for the interchange of goods between the railway and the Regent's Canal. In the 1980s the former depot closed and many of the buildings and spaces were repurposed for market use. The Grade II listed Interchange Warehouse and many of the smaller and simpler C19 warehouse buildings associated with the former goods depot are still retained today. These



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buildings serve to frame part of the original canal basin courtyard, now known as West Yard. The yard is particularly characterful and retains many original robust stone surface finishes and a canal inlet that has been partially infilled with timber decking, but retains its original form beneath.

The Grade II listed Interchange Warehouse is noted in the listing description for its architectural interest, being a good example of a large-scale, late-Victorian warehouse and for its historic interest as a key component of the former Camden Goods Depot and one of the most complete examples of Victorian railway buildings in the country. Due to the scale of the warehouse, it is a dominant and iconic feature in many local and wider views, including those views originating from the Regent's Canal towpath, various bridges that cross the canal, and in longer views from Primrose Hill. The warehouse is easily recognisable in views due to its distinctive red brick finish, rectilinear profile and prominent water tower. The area of the warehouse that is physically affected by the proposals is at canal level, where the interior comprises a former storage and goods transfer area with robust brick surfaces and distinctive jack arched structure. The site also includes a canal inlet that runs beneath the warehouse, known as 'Dead Dog Basin', where goods were loaded onto canal barges.

These original 19th century elements of the former Camden Goods Depot possess historical value for their role in illustrating the heritage of the site and are of architectural value for their robust industrial aesthetic. They also make a significant contribution to the character of the Regent's Canal Conservation Area and to the setting of other Grade II listed structures nearby including the roving bridge, double canal lock and Hampstead Road Bridge.

Background

Planning permission was granted in 2015 for a comprehensive scheme of works to the Camden Lock Market and included proposals that went beyond the current site area to include the rest of the market buildings. The proposals affecting the current site include repurposing of the canal-level accommodation at the Interchange Warehouse and provision of access through to Dead Dog Basin, alterations to the buildings fronting onto West Yard, provision of a new canal side building on the south west side of the Yard and a high level bridge over the canal inlet. Historic England supported the principle of the proposals and considered that they complemented and enhanced the character of the conservation area and the retained historic buildings. We also welcomed the proposed new and accessible routes through the site and the reuse of historic yard surface finishes.

We understand that this planning permission has now expired and was not implemented.



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Impact

The current proposals for Interchange Warehouse, Dead Dog Basin and the buildings around the West Yard reflect the works previously approved under the 2015 planning permission. As such, it is our view that these proposals are likely to have a positive impact on the significance of the affected heritage assets.

The main variations presented for consideration in the current proposals include the provision of a temporary 40 metre high observation wheel, associated facilities and structures. We note that there are no plans indicating any new works to the historic surface finishes other than those associated with the temporary works.

In relation to heritage impacts, the key impacts relate to the proposed temporary 40 metre high observation wheel would affect the significance and setting of many heritage assets in the immediate vicinity of the site. This is due to its height, bulk, scale and design, which is in clear contrast to the solidity of the surrounding industrial architecture and through the incorporation of movement.

At 40 metres high, the wheel is considered to be a tall building and would impact on the setting of heritage assets located some significant distance from the site. The rendered images that you have provided show that the wheel would be visible in local views looking north along Arlington Road, Chalk Farm Road and from the towpath of the Regent's Canal. The proposals are also likely to be visible from Primrose Hill and Parliament Hill. In views from Primrose Hill, the wheel would be visible in the skyline when looking towards Camden Town and would appear in the backdrop setting of the Interchange Warehouse. In the Parliament Hill views, the wheel appears on the general skyline in an area of varied townscape.

We consider the most harmful impacts of the proposed observation wheel would be on the significance and setting of the Interchange Warehouse. In views originating from the Regent's Canal towpath, from the bridges over the canal and in longer views from Primrose Hill, the proposed wheel would challenge the dominance and iconic nature of the Interchange Warehouse by appearing as a prominent and eye catching object in the foreground and background of these key views of the warehouse. Similarly, the proposed wheel would have a dominant impact on the Regent's Canal Conservation Area and the buildings around West Yard by providing a new focal point to this historic collection of buildings and spaces. Notably, the visibility of the building is likely to be increased through the incorporation of movement and by any lighting at night time.

We acknowledge that the proposed harm to the historic environment arising from the proposed observation wheel would be temporary. However, given the size and likely cost of construction, it is entirely possible that if the wheel were successful as a tourist attraction, there could be future applications to extend the temporary period or make it





permanent.

Legislation, Planning Policy and Guidance

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the obligation on local planning authorities to pay special regard to safeguarding the special interest of listed buildings and their settings, and preserving or enhancing the character or appearance of conservation areas.

The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development', a key component of which includes protecting and enhancing the historic environment. In general terms, the document places great weight on: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; their potential to contribute to sustainable communities; and the desirability of new development making a positive contribution to the historic environment's local distinctiveness.

Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Paragraph 202 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

The London Plan 2021 Policy HC4 refers to the London View Management Framework 2012 (LVMF) and states that development proposals in the background of a view should give context to landmarks and should not harm the composition of the view as a whole. Views 2A and 4A of the LVMF seek to protect a series of London Panoramas looking from Parliament Hill and Primrose Hill towards the heart of London. Policy D9 refers to tall buildings and states that proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.

The London Borough of Camden Planning Framework for Camden Goods Yard 201731 has a section focusing on the Interchange and Market Edge area. It states that development in this area should include enhancement to the setting and public realm surrounding the Interchange building, provision of a more welcoming and





attractive front-facing environment and safe, and an attractive and inclusive public space.

Historic England's Advice Note 4 on Tall Buildings provides guidance in the assessment of the impact of tall buildings on the historic environment.

Position

Historic England welcomes the proposed works to the Interchange Warehouse, Dead Dog Basin and the buildings around the West Yard and considers the proposals to bring public/heritage benefits through the revealing of previously inaccessible historic areas of the site to the public, as well as securing the refurbishment and repair of the historic buildings, many of which are in need of repair and regeneration.

We consider the proposed observation wheel to have a harmful impact on the significance and setting of numerous heritage assets, particularly the Grade II Interchange Warehouse and the Regent's Canal Conservation Area. In our view, this harm is less than substantial, but towards the upper end of the scale.

In accordance with the policies set out above, your authority will need to ensure that the proposals are fully justified and weighed against any public benefits.

Should you be minded to accept the principle of development of the observation wheel for a temporary period, we would recommend that you seek to ensure that the design of the proposed observation wheel and all associated structures is of the highest architectural and material quality, regardless of the temporary nature of the works. We would also recommend that on expiry of the temporary period, conditions are placed on the structures to be permanently removed and no further temporary permissions are granted. If an application were put forward for permanent permission for these works, it is possible that we would raise an objection.

In our view, the proposed temporary works should not conflict with the repair and regeneration of the surrounding historic buildings. We understand that the proposals are intended to be implemented in tandem, but would strongly recommend that the sequencing of delivery of any temporary structures comes alongside, or after, the delivery of the works to the buildings. We would also strongly recommend that the proposals include new and accessible routes through the West Yard and the reuse of historic yard surface finishes, as approved in the 2015 planning permission.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 200 and 202 of the NPPF.



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In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

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