

Application No:	Consultees Name:	Received:	Comment:	Response:
2022/3853/P	Camden Railway Heritage Trust	03/10/2022 19:03:26	OBJ	<p>1. The wider context</p> <p>The Chalk Farm Railway Lands, of which the site forms part, retain a wealth of historical features that have yet to be revealed to the general public. CRHT believes that appreciation and celebration of this rich canal and railway heritage is central to the attraction of the major Camden Markets and to the pride people feel as they negotiate them. While much that has been done in the last five years is very good, this contrasts with the creation only a little earlier of a series of alien structures, Buildings A to D, approved by the planning authorities, that now stand as a stark example of inappropriate development. The public is right to be very wary of further damage to heritage in the name of market retail.</p> <p>Proposals must serve the long-term interests of the area, not foreclose the longer-term vision. Re-purposing of heritage assets should open up opportunities for subsequent stages of development and avoid proposals that compromise future opportunities. The opening of the Interchange Basin and East Vaults must be seen in this context, as part of a process that could extend over many years.</p> <p>2. General observations regarding planning application</p> <p>The volume and size of documents submitted with the planning application is very substantial. Many contain a large proportion of 'boiler plate' – quotes from general planning guidelines, etc – and a much smaller "Assessment", the important part.</p> <p>Much of this assessment should have been incorporated, at least in summary form, into the Design and Access Statement (DAS), which may be the only document consulted by many. This document is commendably succinct, but when examined over its eight parts the content is disappointingly meagre. Many pages are devoted to images and photographs. While the plans are well annotated to show what goes where this is at a high level and the document lacks design detail. As for access, an important aspect of the West Yard developments, this is barely addressed. We attempt to correct for this in Section 6 below.</p> <p>3. East Vaults and Interchange Dock</p> <p>If altering a heritage asset, it is important to ensure that its original form and purpose remain legible and explained. This will not be the case once the East Vaults, part of the Grade II listed Interchange warehouse, have been re-purposed. Around half the area, that closest to the opening to the Regent's Canal, will be enclosed and given over to waste disposal. This will detract greatly from a visual understanding of the relationship between the vaults, the basin and the canal, despite there being some limited access to the basin from the exhibition space.</p> <p>On the other hand, some original features will not only be retained but enhanced, which is to be welcomed. In regard to the exhibition space, the aim is to attract diverse audiences. But the potential of an exhibition centre to attract audiences, diverse or otherwise, depends largely on its content and management. The application describes several cultural partners, but if this exhibition is to be permanent, in other words a museum or permanent venue, then its design should reflect the content and narrative of the exhibition and objects/material to be displayed. It is far from clear what is intended for the permanent exhibition. Lighting of the basin and vaults will be critical to the appreciation of these spaces, but there does not appear to be any report on this in the application. The lighting of the early Victorian brickwork on the west side of the Basin, formerly the Wine and Beer Vaults, will be particularly important.</p> <p>The artists' impressions of the Interchange Basin in the DAS appear to show a sloping soffit that does not appear justified by any perspective considerations, and hence is confusing. The reader may also be misled by the view being a section taken midway along the basin. No such view is shown from under the towpath bridge, but this is the view waterbus passengers will first see on arrival at Camden Lock.</p> <p>4. West Yard and Temporary Observation Wheel</p> <p>The West Yard needs breathing space – better hard and soft landscaping to make it more attractive for visitors. The Wheel's physical presence will reduce public space and accentuate the feeling of over-crowding.</p>

Application No: Consultees Name: Received:

Comment:

Response:

The dock in West Yard will only be covered by a bridge, but it will be out of use for canal boats, a great loss of colour, liveliness and amenity for visitors, residents and businesses.

The temporary Observation Wheel is to be justified on grounds of increasing the footfall and the dwelling time in Camden Markets in order to revive the market economy following the pandemic downturn and change the mix of visitors to one with more local and family participation. Very little information is provided in the application to support this justification.

Nor does any part of the application consider other options to meet these objectives, a failing that may undermine our confidence in the Wheel being a temporary facility rather than a longer-term money spinner, or a means of enhancing the value of the Market prior to a sale.

The DAS refers to Camden's history of showmanship, the arts, music, and rebellious spirit. Yet an Observation Wheel is a tired and old-fashioned idea that does not reflect or link to the cultural history of Camden or the aspiration to revive culture and the arts. It is more likely to damage the potential for the East Vaults to become an arts venue rather than enhance their reputation and make them attractive for young people and cultural partners.

The DAS makes it clear that the Wheel is an 'off the shelf' product from a manufacturer. Detail about the design and manufacturer is lacking, except that it states the cover plates will be removed to reveal the structure. The lack of bespoke design and technical innovation is not appropriate given the aspiration to look to the future and bring in arts and culture at the highest level, such as the Turner prize.

The physical presence of the 40m high wheel will be intrusive and damaging to the landscape and heritage of Camden Lock. As the heritage statement itself states, the area is not about spectacular high-rise, it is about the fine grain of materials, landscape, bridges and walkways that bringing people closer to history and nature. The application itself refers to the 'tight knit urban grain' as Camden Lock's defining character as a heritage asset. The addition of the Observation Wheel would damage the urban grain, be out of scale, and have no relationship to its historical narrative.

Historic England and the Canal and River Trust have approved the Wheel in principle. The damage to the Interchange warehouse and the heritage in West Yard and surrounding buildings caused by the Wheel is not to be considered 'significant', provided always that the Wheel is temporary.

Yet the fundamental problem with the application is that we do not know whether the Wheel is a temporary or permanent structure. According to the Statement of Community Involvement:

"Once the five year period is over, the Applicant does not anticipate the Wheel to continue attracting a new audience to the market as demands for new experiences change. We will however consult with the public and stall traders to understand whether the demand for the wheel remains strong and if the Wheel's presence in the market should be extended."

The duration of the Wheel's presence in West Yard is therefore a decision that will be based largely on demand in five years' time and on the views of an unidentified clientèle. A temporary attraction could easily turn into a permanent fixture, particularly if its removal is contingent on the structure of the wheel being reused. There are precedents for temporary structures to become permanent – for example the London Eye. The danger of the wheel not being removed is stronger in a period of economic austerity.

Uncertainty about the temporary nature of the Wheel removes any incentive to further open up the heritage, such as the Wine and Beer Vaults and the Eastern Horse Tunnel, by, for example, linking the East Vaults with the Wine and Beer Vaults via a pontoon bridge across the basin. More immediately it places in doubt the restoration of the historic edges of Purfleet Wharf and the reinstatement of Dingwall's Dock for use once again by a waterbus operator.

The DAS shows removal of the Wheel in Phase 3, ie 2025-2027. This cannot of course be correct as the Wheel is not operational until later in 2023.

Application No: Consultees Name: Received:

Comment:

Response:

5. Observation Wheel experience

The Wheel will have 15 gondolas at peak periods, with a maximum of 12 people in each gondola, most of whom will have paid £25 for one rotation. A rotation takes between 15 and 20 minutes, the shorter rotation involving continuous movement at about 0.14 metres per second with disembarkation from and embarkation to a moving gondola.

The application hardly addresses what passengers would experience other than music. This is an attempt to describe the experience of boarding a 'flight'.

The top gondola and the three gondolas either side will get a view of the wider landscape (see Townscape Visual Impact Assessment), the standing passengers in the lowest of these seven gondolas then being about 25 metres above ground level and just above the roof level of the Interchange. For a 15 minute rotation, the passengers would have a wider landscape view for about six minutes. The other nine minutes would provide a pleasant view of the nearby Regent's Canal and Camden Markets, but one that could be obtained without getting onto the Wheel.

The views from the top, shown in the application to four points of the compass, are underwhelming, precisely because the area is one of fine urban grain rather than spectacular towers, public buildings and landmarks (as with the London Eye). Will the view of the City be better than that obtained from Primrose Hill or Parliament Hill for free? Can the £25 ticket for the Wheel be justified by a six minute maximum view of the panorama in a gondola shared with twelve other adults each trying to obtain the same view? Would the longer rotation time of 20 minutes and its eight minutes at higher level be enough as an educational experience for schoolchildren? Were schools advised of the duration of such 'flights' when they responded with enthusiasm?

This analysis suggests that demand for the Observation Wheel will have to be sustained primarily by its novelty, entertainment and fairground quality rather than its educational benefits. But it is not clear why something associated with a provincial fairground attraction would attract a more 'diverse audience'. The Observation Wheel is most likely to attract tourists and visitors from outside the area and less likely to be of interest (or affordable) to local people. The Wheel has no cultural or artistic connection to the proposed exhibition centre, which has an entirely different function.

6. Access

Access to the waterbus across the exhibition spaces in the East Vaults is not very clearly shown and is not addressed in the Operational Management Plan. Without a dedicated access route there is likely to be confusion and conflict between visitors to the exhibitions and waterbus users. At the very least the waterbus access route should be distinguished by colour or texture markings in the paving.

The Operational Management Plan is also silent regarding the shared access to public WCs and the plant and waste storage areas. It is therefore difficult to assess what conflicts may arise, but intuitively it seems unwise to combine such access.

A 'canal boat mooring' is shown alongside the towpath entrance to West Yard. It is not clear what kind of boats will use this mooring. Even though boats will be moored alongside the hard standing, intensive movements in this very tight area will cause congestion.

Is it necessary to clutter West Yard with cycle spaces when space is already so very limited? Cyclists should be restricted to access routes and advised where they can leave cycles off site without taking up key space. The Operational Management Plan looks at the embark/disembark areas for the Wheel in some detail, taking a people density approach. However, it will be difficult to manage the disembarkation process, from which many people will flow onto the bridge over the dock. The bridge is only 2.9 metres wide, with a guard rail in the centre. It must accommodate pedestrians, cyclists and wheelchair users passing in both directions. This bridge is destined to be a key part of the two-way route between the towpath and Chalk Farm Road as many people pass through Camden Lock Market without using the option of switching to the south side of the canal

Application No:	Consultees Name:	Received:	Comment:	Response:
				<p>and taking the Roving Bridge back to the towpath. The reason for having reduced the width of bridge is understood, but intuitively this looks like a bottleneck. It would be unfortunate if security officers were needed to direct the flow of traffic.</p> <p>As stated in Section 2, the movement of people around the site, one of the key issues, does not appear to be well addressed.</p>
