

# CAMDEN LOCK MARKET, CHALK FARM ROAD, LONDON. NW1 8NH (APPLICATION REFS.: 2022/3853/P AND 2022/3940/L)

## Response to Design and Conservation Feedback

January 2023

### Introduction

1. The following note has been prepared to address the key points and questions included within the representations provided by Camden's Conservation Officer and provide a response by direct commentary. The key points are paraphrased to help provide a clear response to each point or question included within the representations. The Conservation Officer comments are provided in italics followed by our response.
2. This note should be read in conjunction with the application documentation including the Design and Access Statement (prepared by Piercy and Co), Design Response document (prepared by Piercy and Co), Reinstatement Strategy (prepared by Piercy and Co), Structural Stage 3 Report (prepared by Walsh), Built Heritage Statement (prepared by Turley) and Townscape Visual Impact Assessment (prepared by Turley).
3. The comprehensive redevelopment of Camden Lock Market was granted Planning Permission and Listed Building Consent on 22 July 2016 (2015/4774/P) and 18th August 2016 (2015/4812/L) respectively. Although this permission has now lapsed, it remains a material consideration. The permission was for the:  
  
*'Change of use of existing East Vaults for flexible market uses (Classes A) and exhibition/events use (Classes D1 and D2); use of Middle Yard basement as exhibition/events venue (Classes D1 and D2); and use of the rest of the site for market uses (Classes A and B1). Ancillary works and alterations to existing structures and surfaces and other public realm improvements.'*
4. The redevelopment of the West Yard, Interchange Building and Dead Dog Basin was found to be acceptable in heritage terms when consented in this previous permission and is largely replicated within the current proposals. Where relevant this has been detailed in our responses below.

### Observation Wheel

5. *There is potential harm to possible historic fabric and surfaces of the yard and basin resulting from the invasive engineering* – The siting of the Observation Wheel has been located in an area of prevailing modern surface pavers. Should any historic surface materials be found below the modern pavers, this would be carefully recorded, removed and stored for protection and reinstated after the removal of the temporary observation wheel. Further information can be found in the Reinstatement Strategy which was submitted alongside the planning application and has been submitted again alongside this response note. There would be no harm or loss of historic fabric arising from the works. Moreover, there is an opportunity to deliver a better

quality and more consistent appearance to the paving in West Yard following the removal of the temporary observation wheel and proposed reinstatement.

6. *How is the structural integrity and watertightness of the canal basin to be maintained?* - Structural assessment undertaken as part of the application by Walsh Structural and Civil Engineers confirms that the ground conditions consist of London clay to depth of approx. 30m, which is an impermeable material (Stage 3 Structural Report, Walsh). Piling into this stratum will not impact the integrity of the basin as the conditions remain the same. Indeed, the base of most canals were cut into clay and this provides a natural watertightness.
7. *There is a loss of function to the canal basin* - The functional impact will be limited and temporary in nature. Any perceived harm has been mitigated where possible through design including the siting of the observation wheel, which has been carefully positioned to ensure that the basin remains visually open and waterfilled so that its historic function and appearance remains visually appreciable.
8. *Appearance of the footbridge and metalwork railings is considered out of aesthetic cadence with the metalwork present* – It is our opinion that the design of the footbridge and railings are in keeping with the existing metalwork present and character of the West Yard. Additional information has been provided within the supporting Design Response report submitted in December 2022. This Design Response report has been submitted alongside this response note. In summary, the railings are black metal with a cross pattern, which reflects the historic metalwork found locally. In our view the proposed metalwork complements the historic industrial character of the West Yard and forms part of the ‘family’ of metal bridges in the conservation area. The appearance of the footbridge is dictated by the requirements for level access and is therefore required to be level, we consider the benefits of level access outweigh any aesthetic benefit that would result from a traditionally arched bridge profile.
9. *There will be a visual impact on views to interchange building* - The impact is reduced by the lightweight structure of the temporary Observation Wheel, whereby the Interchange Building will remain visible behind. The scale of the impact is also considered limited due to the temporary nature of the wheel. An assessment of the temporary impact of the Observation Wheel is provided within the accompanying Built Heritage Statement and Townscape and Visual Impact Assessment.
10. *There will be an impact on the setting of surrounding heritage assets* - The impact on the setting of surrounding heritage assets will be limited due to the temporary 5 year duration of the wheel. This potential impact has also been mitigated through a sensitive approach to the siting, operation, and design of the wheel (detailed in the submitted Design Response and the Built Heritage Statement). The scope of heritage assets was discussed and agreed with officers at the pre-application stage and have been assessed within the accompanying Built Heritage Statement. This concludes that the temporary nature of the proposed temporary Observation Wheel will mean that setting or visual impacts would be for a limited duration and reversible.

#### **West Yard**

11. *Refronting the shop units would strip ‘any vestige of historic context away’ and ‘diminish their contribution to the visual aesthetic of the assembly as a whole’* – We disagree with this assertion. The existing stalls are not historic (dating to the 1990’s and of timber construction with glazing and painted a uniform black). They were constructed and relate to the operation of West Yard as

a commercial market and do not have any direct association with the historic uses of the surrounding heritage assets. The accompanying Built Heritage Statement identified that the built fabric of the existing stalls makes no contribution to the significance of the conservation area or nearby listed building(s). Additionally, the existing single storey building where the new pavilion would be constructed has a plain elevation with tiled pitched roof and does not contribute positively to the character and appearance of the Regent's Canal conservation area. The high-quality replacements would improve the overall appearance, as demonstrated in the recent refurbishment of Stables Yard. The shopfronts have been designed in an industrial style to reflect the history of the market and complement the industrial heritage of the area. The full redevelopment of the shop units has been previously consented in the 2015 scheme (ref: 2015/4774/P & 2025/4812/L) and was considered acceptable in heritage terms. The proposed shopfronts also fully align with approvals elsewhere within Camden Lock Market. Moreover, representations by Historic England have concluded that the proposed works to buildings around the West Yard would have a positive impact on the affected heritage assets (Historic England, 4 October 2022, Ref: P01545553).

#### **Interchange Building East Vaults and Dead Dog Basin**

12. *What justification has been put forward for the ten proposed openings into what may be one of the oldest parts of the building?* - The structural openings would result in some limited loss of historic fabric which would impact the listed building. However, 5no. of the openings are necessary to facilitate the operation of the waste disposal (2no. opening) and the operation of the canal boats (3no. openings). The remaining 5no. openings are windows and are considered beneficial in the provision of an improved visual connection to the basin for users of the exhibition space and canal boats. This broadly aligns with the previously consented scheme in the 2015 (ref: 2015/4774/P & 2025/4812/L) and was considered acceptable in heritage terms. Any impact resulting from the removal of some original fabric will constitute 'less than substantial harm' at the lower end of the spectrum of harm. This should be weighed with the beneficial impacts of the new uses for the East Vaults and Dead Dog Basin and the improved visual connection of these spaces. Overall, the heritage interests of the buildings structure, the legibility of plan form and distinction between Dead Dog Basin and the East Vaults is not adversely affected.
13. *More should be done to retain the open character and historic spatial quality of the Interchange Building* – It is acknowledged that the subdivision of space will adversely impact the spatial qualities of the east vaults within the Interchange Building. However, this is an industrial space and would have been used on a pragmatic and ad hoc basis for the storage of goods and it is our opinion that this would still be appreciable with the proposals. Importantly, any perceived impact should be balanced with the significant benefits that will result from the works of repair and enhancement that the proposals would deliver, as well as providing public access to this area. These aspects are considered to have great weight in that overall heritage balance. In addition, the subdivision of the space is necessary to enable the sustainable transport of waste disposal, which provides a planning benefit that should also be weighed in the balance against any perceived harm. It is our opinion that any perceived harm would be limited in nature when a comparison is made between the proposed and existing use and appearance, which has existing subdivisions and is in poor condition. It is our conclusion that the proposals would be an improvement on the existing baseline condition.

14. *Any dismantling/demolition of historic brickwork needs be covered by a planning condition which states that all such work be undertaken by hand without power tools and bricks safely stored for reuse on site* - We agree that this is a reasonable request for a planning condition.
15. *There should be retention of historic fixtures and fittings, structural steelwork and jack arch brick ceiling, which forms an important part of the significance of the building* – The proposals would result in the preservation and conservation of significant historic fabric. We suggest that a planning condition would be an appropriate way to secure this retention.
16. *Will the introduction of a jetty compromise the waterproofness and structure of the canal under the building?* Structural assessment undertaken as part of the application by Walsh Structural and Civil Engineers confirms that the ground conditions consist of London clay to depth of approx. 30m, which is an impermeable material (Stage 3 Structural Report, Walsh). Piling into this stratum will not impact the integrity of the basin as the conditions remain the same. It is the case that the base of most canals were cut into clay.
17. *Is there a programme of maintenance of the waterway within the Dead Dog Basin?* Initial clearance and maintenance of the waterway would be undertaken as part of the proposals. The proposed functions of waste management and tour boats would then provide a sustainable long-term use that would ensure the continued upkeep of the basin.
18. Additional Note – In all cases, the previously consented scheme in 2015 (ref: 2015/4774/P & 2025/4812/L) was broadly consistent with the application proposals and, should be considered a material consideration of significant weight in the determination of the proposal's acceptability. Moreover, representations by Historic England have concluded that the proposed works to the Interchange Building and Dead Dog Basin would have a positive impact on the affected heritage assets (Historic England, 4 October 2022, Ref: P01545553).

#### **Removal of Food Stalls**

19. *The food stalls are modern but do encourage trade and in situ food consumption and give a hint of the activity and bustle that the basin would have experienced when fully functioning as a commercial transportation hub.* – It should be noted that the existing food stalls are a temporary permission and will be removed following the expiration of the planning permission in December 2023. Due to the temporary nature of the stalls permission, it is our opinion that their removal should be a material consideration in the assessment of the application proposals.

#### **Camden Lock Place**

20. *The works would result in the loss of what appears to be an original pair of timber doors is regrettable. Ideally, they would be retained. What is proposed and why?* The doors have a traditional appearance and could be seen to be consistent with the character of the markets, however, they are not historic/original (clearly the opening has been partially infilled with red bricks, the steel I-bar lintel is non-original, the glazing to the overlight window is modern), there is a potential that the doors and ironmongery may have been previously reused (see Figure 1). The replacement door is necessary to meet the safety requirements of the proposed UKPN substation in this location. With appropriate detailing the replacement door could maintain the commercial / industrial character of the conservation area. The detailing of the replacement door could be conditioned to provide an appropriate way to secure this appearance.





**Figure 1:** Location of proposed sub-station, Camden Lock Place

### **Connection to Stables Market**

21. The client's approach to each planning proposal is based on an understanding of the different character areas of the markets, their strengths and weaknesses, and their history and offer. The ambition of our client's vision, presented for Strategic Panel review on 17<sup>th</sup> October 2022, is to set the parameters within which the markets will evolve, whilst staying true to their historic character and functions.
22. Stables and Camden Lock Market have each their own character, which we aim to maintain. These markets have been historically defined as two entities by Camden Lock Place. The existing connections through the positive contributors on the Camden Lock side remain unchanged, however, all the passages through the Ground Floor of the Triangle Building on the Stables have recently been internally reconfigured to improve the flow between the markets.

### **Archaeology**

23. The Conservation Officers comments have suggested that a requirement for archaeological monitoring or an archaeological watching brief should be attached to any consent. The client team are agreed that an archaeological condition applied to the application provide an appropriate way to mitigate any potential impacts to archaeological remains.

### **Conclusions**

24. We appreciate the opportunity to respond to the Conservation Officers representations and hope that the response above is helpful in the application determination and provides sufficient information and clarity on the queries and comments provided.
25. As set out in the submitted Built Heritage Statement (prepared by Turley), we acknowledge that the introduction of a temporary observation wheel for a period of 5 years would have an impact on local character and views. Where possible these impacts have been mitigated through a careful design which has been detailed within the supporting Design Response document (prepared by Piercy and Co). This considered design would visually help to integrate the structure within the existing West Yard. The temporary nature of the proposed observation wheel will mean that setting or visual impacts would be for a limited duration and would be reversible. The harm caused to the significance of those identified designated heritage assets by the temporary observation wheel would be less than substantial for the purposes of the NPPF; ranging from the middle to the lower end of the 'spectrum of harm' envisaged by the NPPF.
26. Any such harm should be weighed against the "public benefits" of the proposals, including where appropriate securing the optimum viable use of the asset(s). The Town Planning Statement (prepared by Gerald Eve LLP) describes in full the public benefits that could be delivered by the Proposed Development and associated planning balance, confirming that the Proposed Development would be sustainable development when considered in overall terms. This includes a number of heritage benefits that will arise from the high-quality improvements to Camden Lock Market and redevelopment of the East Vaults of the grade II listed Interchange Building to provide new exhibition space and public access as well as sustainable waste management. This would ensure a long-term sustainable use for this underused space.
27. We would like to continue to support the constructive liaison throughout the application determination period where possible. If there are any further questions or points of clarity or discussions that you feel are required, we would be happy to continue to support through the provision of additional information or liaison as necessary.

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Jan 2022