

Address:	Camden Lock Market Site Chalk Farm Road London NW1 8NH		1&2
Application Number:	2022/3853/P 2022/3940/L	Officer: Alex Kresovic	
Ward:	Camden Town		
Date Received:	08/09/2022		
Proposal (Planning application): Introduction of new exhibition space, flexible events and market uses through a change of use of the existing East Vaults, installation of new retail shopfronts within West Yard; creation of a new jetty within Dead Dog Basin and erection of a temporary observation wheel for five years together with ancillary works and alterations to existing structures, surfaces and other public realm improvements and associated works.			
Background Papers, Supporting Documents and Drawing Numbers: Existing and Proposed Plans prepared by Piercy & Company, project No. 13663, drawing No. 010, Rev A; drawing No. 001, Rev C; drawing No. 100, Rev C; Series P01, drawing No. 100, Rev C; drawing No. 101, Rev C; drawing No. 102, Rev C; drawing No. 103, Rev C; drawing No. 200, Rev C; drawing No. 201, Rev C; drawing No. 202, Rev C; drawing No. 300, Rev C, all dated 30.08.2022. Documents: Design and Access Statement (Piercy & Company) dated August 2022 Town Planning Statement (Gerald Eve) dated August 2022 Heritage, Townscape and Visual Impact Assessment (Turley) dated August 2022 Daylight and Sunlight Report (GIA) dated 04/07/2022 Cultural Plan (LabTech) dated August 2022 Air Quality Assessment (Waterman Group) dated August 2022 Accessibility Assessment (ARUP) dated 26 August 2022 Archaeological Desk Based Assessment (MOLA) dated 15/08/22 Circular Economy Statement (ARUP) dated 23 August 2022 Energy Statement (GDM) dated 26-08-2022 Fire Strategy Statement (Jensen Hughes) dated 27 July 2022 Geotechnical Interpretative Report (CGL) dated August 2022 Life Cycle Carbon Assessment for Wheel (ARUP) 23 August 2022 Retail Statement (LabTech) dated August 2022 Preliminary Ecological Appraisal (Waterman Group) dated August 2022 Pre-Demolition Audit Report (ARUP) dated 9 August 2022 Operational Management Plan (Jolita Galkauskaite) dated August 2022 Planning Compliance Report (KP Acoustics) dated 12 August 2022 Servicing Management Plan (ARUP) dated 23 August 2022 Structural Report (Walsh) dated 31 May 2022 Sustainability Statement (ARUP) dated 23 August 2022 Whole Life Carbon Assessment for Refurbishment Works (ARUP) dated 23 August 2022 Transport Assessment & Interim Travel Plan (ARUP) dated August 2022 Reinstatement Strategy (Piercy & Company) dated August 2022 Townscape Visual Impact Assessment (Turley) dated August 2022, Daylight, Sunlight and Privacy VL 2801 (GIA) 26/05/23.			

RECOMMENDATION SUMMARY:**Grant conditional Planning Permission following:**

- (i) referral to Mayor of London for his direction;**
- (ii) finalisation of detailed wording for conditions following consultation with the Mayor;**
- and**
- (iii) completion of a section 106 Legal Agreement.**

Proposal (Listed building application):

Internal and external alterations to the East Vaults to facilitate new exhibition, events and market uses together with ancillary uses; installation of new retail shopfronts within West Yard; creation of a new jetty within Dead Dog Basin and erection of a temporary observation wheel for five years together with ancillary works and alterations to existing structures, surfaces and other public realm improvements and associated works.

Background Papers, Supporting Documents and Drawing Numbers:

Drawing Nos: Existing & Proposed Plans prepared by Piercy & Company, project No. 13663, drawing No. 100, Rev C; drawing No. 101, Rev C; drawing No. 200, Rev C; drawing No. 201, Rev C; drawing No. 202, Rev C; drawing No. 300, Rev C; drawing No. 301, Rev C; drawing No. 302, Rev C; drawing No. 303, Rev C; drawing No. 304, Rev C; drawing No. 310, Rev B; drawing No. 330, Rev A, all dated 30.08.2022.

Documents:

Design and Access Statement (Piercy & Company) dated August 2022
Town Planning Statement (Gerald Eve) dated August 2022
Heritage, Townscape and Visual Impact Assessment (Turley) dated August 2022
Daylight and Sunlight Report (GIA) dated 04/07/2022
Cultural Plan (LabTech) dated August 2022
Air Quality Assessment (Waterman Group) dated August 2022
Accessibility Assessment (ARUP) dated 26 August 2022
Archaeological Desk Based Assessment (MOLA) dated 15/08/22
Circular Economy Statement (ARUP) dated 23 August 2022
Energy Statement (GDM) dated 26-08-2022
Fire Strategy Statement (Jensen Hughes) dated 27 July 2022
Geotechnical Interpretative Report (CGL) dated August 2022
Life Cycle Carbon Assessment for Wheel (ARUP) 23 August 2022
Retail Statement (LabTech) dated August 2022
Preliminary Ecological Appraisal (Waterman Group) dated August 2022
Pre-Demolition Audit Report (ARUP) dated 9 August 2022
Operational Management Plan (Jolita Galkauskaite) dated August 2022
Planning Compliance Report (KP Acoustics) dated 12 August 2022
Servicing Management Plan (ARUP) dated 23 August 2022
Structural Report (Walsh) dated 31 May 2022
Sustainability Statement (ARUP) dated 23 August 2022
Whole Life Carbon Assessment for Refurbishment Works (ARUP) dated 23 August 2022
Transport Assessment & Interim Travel Plan (ARUP) dated August 2022
Reinstatement Strategy (Piercy & Company) dated August 2022
Townscape Visual Impact Assessment (Turley) dated August 2022

RECOMMENDATION SUMMARY: Grant conditional listed building consent**Applicant:****Agent:**

Camden Lock Market Limited (Labtech)	Ms Bethan Warwick - (Gerald Eve) One Fitzroy 6 Mortimer Street London W1T 3JJ
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ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace (GIA sqm)
Existing		Sui Generis - Market	2,160sqm
		Flexible F1/E	0
		F1 Educational Exhibition Space	0
		TOTAL	2,160sqm
Proposed		Sui Generis – Market	1,721sqm
		Flexible F1/E	377sqm
		F1 Educational Exhibition Space	116sqm
		TOTAL	2,214sqm (Uplift of 54sqm)

Parking Details:		
	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	0	0
Proposed	0	0

OFFICERS' REPORT

Reason for Referral to Committee

Where the Director of Economy, Regeneration and Investment has referred the application for consideration after briefing members [clause 3(vii)].

Reason for Referral to Mayor

This application is referable to the Mayor of London under the provisions of Category 1C of the Schedule to the Town & Country Planning (Mayor of London) Order 2008: "Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London".

Once Camden has resolved to determine the application, it is required to refer it back the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

1 BACKGROUND

- 1.1 A planning application and a listed building consent application, relating to the grade II listed Interchange Building have been submitted for the proposed works. The proposal involves an uplift in floorspace of 54sqm.

2 SITE

- 2.1 The application site, commonly known as Camden Lock Market, is roughly rectangular in shape and covers an area of 0.43ha and is bounded by the Regent's Canal and towpath to the south, Camden High Street/Chalk Farm Road to the east and Camden Lock Place to the north and the East Vaults to the west.
- 2.2 The site is occupied by Camden Lock Market, comprising market stalls, retail and offices. Camden Lock Market is 1 of 5 markets in Camden Town. The site includes 2 basins connected to the Regent's Canal; one of which is open, the other which is covered by the Interchange Building to the west. The site is divided into 2 buildings and 5 areas.



Figure 1: Location Plan shown within red boundary

- 2.3 The western building ranges in height from 2 – 3 storeys and is located around the perimeter of the open basin and is the more historic building on site. The eastern building, known as Market Hall, was built on the site of Dingwall's Timber Yard in the 1990s in pastiche Victorian style. The Market Hall buildings range in height from 3 – 5 storeys (highest at the rear on Camden Lock Place). The site can be divided into 5 character areas, as follows:
1. Camden Lock Place
 2. East Yard
 3. Middle Yard
 4. West Yard
 5. East Vaults/Dead Dog Basin
- 2.4 Camden Lock Place forms the boundary of Camden Lock Market and Stables Market to the north and is occupied by retail market stalls. The Market Hall and East Yard are predominantly retail market with offices above. The Middle Yard has retail and food stalls. The West Yard comprises of a food market with retail/café space around the perimeter.

The East Vaults are currently used for general storage and waste storage. Dead Dog Basin is located under the Interchange Building and is currently unused.

- 2.5 There are currently 270 individual stalls on the site and 59 fixed retail units housing shops, cafes and restaurants. There are 3 main entertainment venues, Dingwall's, Lock 17 and the Terrace and Canalside Bar. Dingwall's live music venue is located on Middle Yard and has capacity for 500 people.
- 2.6 The site is bounded to the east by Chalk Farm Road (which becomes Camden High Street south of bridge over the canal) with the Hawley Wharf site (including market), to the south by the Regent's Canal, towpath and Camden Lock, to the west by the Interchange Building; a seven-storey office building which is grade II listed and to the north by the southern boundary of the Stables Market site, including the former Gilgamesh restaurant and offices.
- 2.7 The site is located within the Regent's Canal Conservation Area, an Archaeological Priority Area, and the Town Centre of Camden Town. The eastern edge of the site is situated within the London View Management Framework protected viewing corridor 2B.1 from Parliament Hill to the Palace of Westminster. The Interchange Building is grade II listed and the only listed building on site. There are several positive contributors on site; Camden Lock Place 3-12, 14-15, 23-40, 41-43, 44-49, and 11 East Yard.
- 2.8 The towpath to the south of the site is designated as Public Open Space (POS). Camden Lock, the Roving Bridge across the canal and the vehicular bridge over the canal are all grade II listed. The Interchange Building to the west is grade II listed. The canal and the canalside bordering the site are designated as a Site of Importance for Nature Conservation (SINC).
- 2.9 The site has a PTAL rating of 6a ('Excellent') on a scale of 0 to 6B, where 6B represents the greatest level of access to public transport services. Camden Town Underground Station is the closest station, located approximately 350m to the south. Camden Road Station is located approximately 450m to the east and is served by Overground services. There are numerous bus services along Camden High Street and Chalk Farm Road.

3 THE PROPOSAL

3.1 Planning permission is sought for:

- Introduction of new exhibition space, flexible events and market uses through a change of use of the existing East Vaults.
- Installation of new retail shopfronts within West Yard.
- Creation of a new jetty within Dead Dog Basin.
- Erection of a temporary 40m observation wheel (for five years).
- Ancillary works and alterations to existing structures, surfaces and other public realm improvements and associated works.

3.2 Listed Building Consent is sought for:

- Internal and external alterations to the East Vaults to facilitate new exhibition, events and market uses together with ancillary uses.

3.3 The current works are the first phase of a wider proposal that the applicant intends to pursue for this market. Their intention is to come forward with two other proposals at a later date for the refurbishment of and the erection of a new roof for the Market Hall, the development of two new buildings in between Middle Yard and West Yard, with retail and

food & beverage predominantly on the lower floors and offices on the upper floors. These works would need to be considered on their own merits against the policies in place at the time, the current application must be considered as a standalone proposal

- 3.4 There was an approved scheme for this wider site (see History) which was never implemented. What the applicant is doing here is revisiting how all those spaces work but in a phased but co-ordinated way.

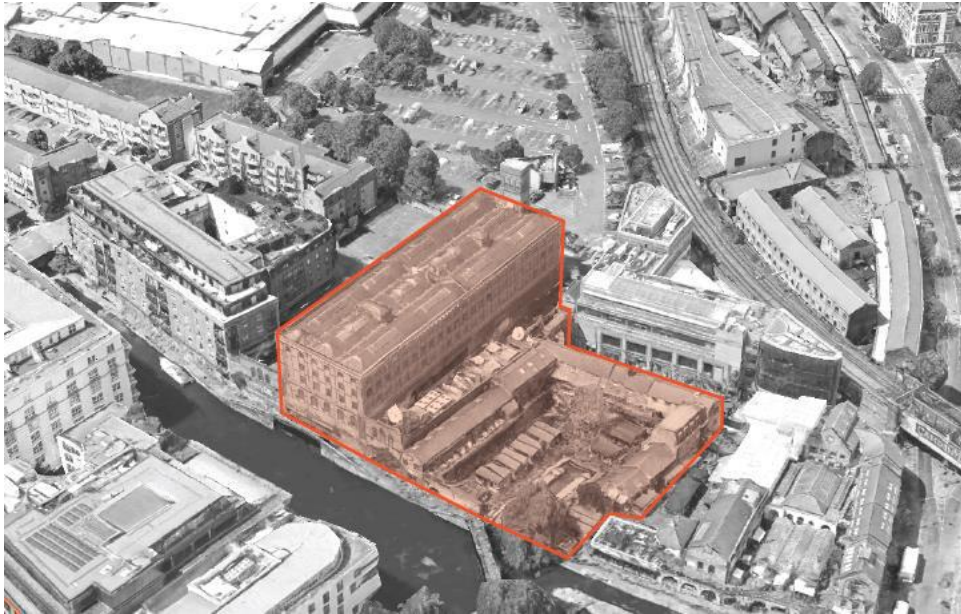


Figure 2: The development site

- 3.5 Phase 2 will relate to the refurbishment of Market Hall to the east, installation of a new roof to the centre of the Market Hall; lower floors upgraded for Sui Generis Market Hall use and Upper floors for Sui Generis Market use.
- 3.6 Phase 3 will relate to the development of two new buildings in between Middle Yard and West Yard, with retail and food & beverage predominantly on the lower floors, offices on the upper floors.
- 3.7 This proposal seeks permission for Phase 1 only. Phases 2 and 3 are likely to come forward at a later date. The Observation Wheel is only proposed to be a temporary structure and would be in situ for five years.
- 3.8 All of the proposed works apart from the observation wheel have largely been approved in the previous application.

4 RELEVANT HISTORY

- 4.1 The general history of the site and surrounding area is as follows:

- 1816: Construction of Regent's Canal commences through area
- 1824: 3 wharves are operating on site (2 of which remain)
- 1846: Construction of Roving Bridge
- 1901: Interchange Building erected
- 1940's: East Dock infilled (currently East Yard)

- 1970's: Canal trade ceases
- 1973: Dingwall's Wharf operates as a market

4.2 The planning history for the site as follows:

- Application reference **PE9900147** – 'Erection of glazed roof and replacement balustrade railing to existing open balcony area at first floor level to the West Yard.' – granted 26/05/1999.
- Application reference **PEX0000395** – 'Change of use of part of the ground floor from retail to restaurant use together with the erection of a first-floor walkway, new steps leading to the ground floor, new ground floor shopfronts and new opening on the ground floor of the building fronting the canal.' – granted 02/08/2001.
- Application reference **2005/3087/P** (and **2005/3089/C**) – 'Demolition of timber enclosures to middle/west yard, and erection of one two-storey building comprising retail (Class A1) and ancillary storage uses, and one three-storey building comprising retail units on ground and first floors and a restaurant (Class A3) on the second floor. Includes the addition of a new pedestrian bridge/walkway linking the proposed buildings at first floor level.' – granted 15/11/2005.
- Application reference **2014/4928/P** – 'Request for Environmental Impact Assessment (EIA) Screening Opinion for works involving the refurbishment and enhancement of Camden Lock Market.' – not required, decision 01/09/2014.
- Application reference **2015/4774/P** (and **2015/4812/L**) – 'Demolition of existing timber Pavilion building, Middle Yard buildings and canopy structures and internal floors in East Yard. Construction of new Middle Yard building comprising basement and part three, part five storeys; single storey Pavilion building; new third storey on north-east of market hall building, bridge over the canal basin; deck area over Dead Dog Basin; and double pitched roof structure over East Yard. 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.' – granted 18/08/2016. It is noted, this application was never implemented and lapsed in 2019.
- Application reference **2017/2378/P** – 'Installation of 34 temporary market stalls (A5 Use) in the West Yard of Camden Lock Market.' – granted 12/04/2017.
- Application reference **2022/1244/P** - Temporary installation of 30 market stalls (sui generis use) for a period of 18 months.' – granted 20/05/2022.
- The applicant undertook a Stage 1 Pre-Application with GLA Officers in March 2022 with a formal written response being issued on 11 March 2022. This provided general in principle support for the proposed land use.

4.3 Relevant applications in the area:

- Application reference **2011/3792/L** (**Camden Lock**) – 'Installation of new rubber lock protector to canal lock island (Camden Road Lock).' – granted 11/04/2012

- Application reference **2012/4628 (*Hawley Wharf*)** – ‘Redevelopment of site to create a mixed use development comprising 8 new buildings between 3 and 9 storeys in height to provide, employment, housing, retail market, cinema, produce market, including change of use of 1 Hawley Road to educational, together with associated engineering works to create basements, plant and ancillary works, highways, public realm improvements, car and cycle parking and landscaping, tree removals, and associated works, following the demolition of all buildings across the site including single storey shopfront extensions at 1-6 Chalk Farm Road (excluding 1 Hawley Road and remaining structures at 1-6 Chalk Farm Road).’ – granted 23/01/2013.
- Application reference **2015/1937/P (*39-45 Kentish Town Road*)** – ‘Erection of a six-storey mixed use building comprising flexible employment/gym at ground floor level and 24 flats (1 x studio, 9 x 1 bed, 9 x 2 bed and 5 x 3 bed) together with associated works to create public realm improvements and landscaping.’ – granted 29/09/2015.
- Application reference **8903570 (*Stables Market*)** – ‘Part refurbishment and change of use and part redevelopment of the site known as Stanley Sidings Chalk Farm Road/Camden Lock Place for a mixture of A1 A3 B1 B2 B8 uses as defined in the Use Classes Order 1987 plus craft workshops (a mixture of A1/B1) and a public toilet together with car parking servicing and access arrangements.’ – granted 23/11/1989.
- Application reference **2021/5328/P (*Middle Yard Building Camden Lock Market*)** – ‘Refurbishment of the open unit to the SW corner of the building, demolition of SW corner extension, refurbishment of existing facades, replacement of timber doors and installation of new timber and glazing, and other associated works.’ – granted 24/02/2022

4.4 Pre-Application

The current application has been shaped by a pre-application process which has involved meetings with planning officers and discussions between the applicant and Council officers. The early iteration proposals were also taken to Camden’s Design Review Panel the feedback from which is discussed in the design section of the report assessment below. The applicant consulted with local councillors, local groups and consulted with the wider public through flyers, webinars and a social media campaign.

5 CONSULTATION SUMMARY

STATUTORY

5.1 Greater London Authority (GLA) – Support

- Land Use Principles: The proposals for the diversification of the market, delivery of a new cultural exhibition space, opening up the East Vaults to the public and provision of a temporary observation wheel are strategically supported.
- Urban Design: The proposal is not located within an area identified as appropriate for tall buildings. Nevertheless, the height of the temporary Observation Wheel does not raise any strategic design concerns. All other design matters are considered to be generally acceptable, subject to the provision of further details.
- Heritage: The scheme would result in less than substantial harm to the Regents Canal Conservation Area, the Grade II Listed Interchange Building as well as a number of nearby heritage assets. It is likely that the public benefits would be capable of outweighing the harm in this circumstance.

- Transport: The strategic transport issues arising from the development could be compliant with the London Plan, subject to further detail on expected pedestrian comfort levels, and a Crowd Management Plan being secured by condition.
- Sustainable Development: Further energy information is required to determine compliance with Policies SI3 and SI4. The Whole Life-cycle Carbon and Circular Economy reports should be incorporated into the relevant GLA template.
- Environment: Further information is required with regards to urban greening, air quality and biodiversity including impacts to SINC (along the canal) is required prior to the mayor's decision-making stage.

Officer's response:

The GLA provided additional comments to the above as shown below:

'From the GLA's perspective all matters are now considered to be appropriately addressed, with the exception of transport'.

As such, the transport concern raised by GLA has been dealt with by TfL. As such, GLA and TfL raise no concerns as all has been addressed accordingly.

5.2 Historic England - Objection

- 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 proposed temporary 40 metre high observation wheel would affect the significance and setting of 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 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.
- 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.
- Conditions are recommended in the event that permission were to be granted, in regards to the temporary permission of the observation wheel, detail of the observation wheel prop and its removal at the end of the approved 5 year period, risk assessment and method statement, and landscaping and lighting details.

Officer's response:

Officers agree that the scheme would result in several heritage benefits. There is also agreement that the scale of the wheel results in some harm to the significance of the Interchange building and Regent's Canal Conservation Area. Officers disagree about the level of harm and have identified less than substantial harm at the lower end of the scale. Historically this part of the conservation area and the immediate setting would have been a busy and dynamic interchange of road, rail, and canal with constant movement and activity generated by the industrial activity and machinery. Were the observation wheel to prove successful then it would have fulfilled its aim which is to attract visitors, increase

footfall and support the long term future of Camden's markets which is of clear public benefit.

5.3 The Greater London Archaeological Advisory Service – No objection.

No objection regarding archaeology subject to a condition on archaeological evaluation.

5.4 Transport for London (Spatial Planning) – No objection.

No objection subject to the inclusion of an Operational Management Plan (OMP) along with a contribution of £100,000 for Cycle Hire operations as part of a s106 Legal Agreement.

5.5 Transport for London (London Underground/DLR Infrastructure Protection)

No objection.

5.6 Canal and River Trust – No objection.

- The wheel and footbridge are to be a temporary installation, to ensure it causes no permanent harm to the heritage of this area and request a condition that these structures be removed within 5 years.
- The Trust has no objection to the proposed restoration and use of the East Vaults.
- The continued operation of the Waterbus, and the removal of waste and recycling by barge, is supported.
- The proposed openings in the east wall between Dead Dog Basin and the East Vaults have a minimalist style, contrasting with the historic doorways with flat-arch lintels, and we consider that this helps to reduce the harm to the historic character of the east wall.
- Conditions provided in regards to the temporary permission of the observation wheel, detail of the observation wheel prop and its removal at the end of the approved 5 year period, risk assessment and method statement, and landscaping and lighting details.

5.7 Thames Water – No objection.

No objection subject to conditions regarding drainage and impact piling.

5.8 Met Police (Designing Out Crime) – No objection.

No objections subject to conditions regarding safety measures being implemented onsite such as CCTV and lighting.

5.9 Camden Railway Heritage Trust - Objection

- The site retains a wealth of historical features that are central to the attraction of the major Camden Markets.
- The public is right to be wary of further damage to heritage in the name of market retail.
- 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.
- The Wheel's physical presence will reduce public space and accentuate the feeling of over-crowding.

- 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 Wheel is an 'off the shelf' product from a manufacturer. Detail about the design is lacking. 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.
- The physical presence of the 40m high wheel will be intrusive and damaging to the landscape and heritage of Camden Lock.
- There are precedents for temporary structures to become permanent – for example the London Eye.
- Will the view of the city be better than that obtained from Primrose Hill or Parliament Hill for free?
- The movement of people around the site, one of the key issues, does not appear to be well addressed.

Officer's response:

The introduction of the temporary observation wheel at a height of 40m, would have an impact on the local character and views. Officers accept there would be harm to designated heritage assets, albeit temporary.

Officers consider that the public benefits of the scheme, including local workforce employment opportunities both during construction and post construction, the revealing of previously inaccessible historic areas of the site (East Vaults/Dead Dog Basin) to the public and securing the refurbishment and repair of the historic buildings are sufficient to outweigh the harm identified to the heritage assets. Based on the evidence presented in the applicant's Heritage Statement and Planning Statement, at this stage GLA Officers consider that the public benefits could (where appropriately secured) outweigh the less than substantial harm.

The design of the observation wheel is a bespoke design which would be the only one in the world. The design of the observation wheel has an industrial appearance which links back to the history of the site and current architectural setting. The black metal finish would also be in keeping with other metalwork present in close proximity to the site, such as bridge parapets, lock gates and railings. As such, the design and materiality of the observation wheel would be sympathetic to the character of the West Yard.

It is not considered that the site will adversely impact views along Gilbey's Yard (closest residential buildings) due to the large Interchange Building separating the two sites, and the openness of the observation wheel which still provides ample opportunity for views through the structure, and nor would it, therefore, affect the levels of daylight and sunlight reaching residents along Gilbey's Yard.

The assessment of visual effects identified that there would be negligible changes to local and longer distance views arising from the proposed development, principally caused by the temporary observation wheel. In views from the local streets, which are aligned towards the site, the observation wheel would be more noticeable and form a visually interesting, temporary landmark. In views where the observation wheel would be experienced square on, clear spacing between the wheel spokes would allow for open sky to be experienced beyond and together with the rounded gondola design would maximise its visual permeability.

The jetty will be relocated to under the Interchange building within the Dead Dog Basin.

If permission is granted, a condition will require the observation wheel and footbridge over the canal to be dismantled and removed from the site within 5 years. A reinstatement strategy has also been submitted which describes the careful procedures that will take place to dismantle the observation wheel and footbridge in a manner which does not impact the fabric of the site.

5.10 Castlehaven Community Association - Objection

- The height of the observation wheel will overshadow the scale of all the nearby buildings and will be out of keeping in the Yard itself.
- The height and scale of the observation wheel will interfere with the privacy of the neighbouring buildings, houses and gardens.
- The observation wheel is out of keeping with the carefully restored railway heritage of the whole of Camden Market.
- The observation wheel will interrupt the existing cycle and pedestrian towpath routes.

Officer's response:

The industrial appearance of the temporary observation wheel links back to the history of the site and current architectural setting. The black metal finish would also be in keeping with other metalwork present in close proximity to the site, such as bridge parapets, lock gates and railings. As such, the design of the observation wheel would be sympathetic to the existing character of the West Yard and Camden Market.

The wheel is a tall structure, but it is a framework structure, visually lightweight and permeable, and would not block views of buildings and spaces.

The observation wheel will be placed adjacent to the existing basin and will not impact any such cycle or pedestrian towpath routes. In fact, the observation wheel will introduce a footbridge over the canal inlet to improve moveability onsite.

5.11 Greater London Industrial Archaeology Society (GLIAS) - Objection

- The proposed 40-metre-diameter Ferris Wheel, would severely intrude into views of the iconic former Interchange Warehouse, which is an outstanding industrial monument. Thereby it would distract and detract from the appreciation of this exceptional, Grade-2-listed building.
- The adaptations to the East Vaults, at the lowest floor level of the Interchange Warehouse, appear low-keyed and they should be beneficial to the sustainable use of the building. But they may damage some unique features of the building unless subjected to more rigorous control than is proposed.
- To protect these features, we require the following measures as conditions:
 - A detailed survey of the ceiling areas, to locate detailed features of interest to the past operation of the building.
 - Proposals to reroute ducts and other services to avoid damaging these features.
 - A methodology for protecting such features during construction.
 - A separate buildings archaeological recording exercise
 - An interpretative scheme for visitors.

Officer's response:

Council notes the concern raised by GLIAS. The condition will be included should planning permission be granted to protect the features mentioned in the GLIAS response.

Local groups

5.12 South Kentish Town CAAC - Objection

- South Kentish Town Conservation Area is immediately adjacent to Regent's Canal and its residents are significantly impacted by developments at Camden Lock.
- The expansion of Camden Market from weekend craft stalls into whole-week tourist venue has been harmful to the character of upper Camden High Street, once pleasant for local shopping (bakers, fish shops, bank, Compendium book shop) but now overwhelmed by thronging pedestrians and ugly tourist shops.
- The Ferris wheel will do further damage to the area, and the development as a whole is far in excess of the carrying-capacity of this squashed urban site.
- This development will be harmful to the character of Camden Lock and should be rejected on conservation grounds.

Officer's response:

Camden Town markets have been an internationally recognised tourist attraction for decades, and this would help to drive additional footfall to the local businesses. Please refer to the above officer's response to Primrose Hill CAAC and the heritage section of the report.

5.13 Belsize CAAC - Objection

- The observation wheel would cause harm to this conservation area which includes a number of nearby listed buildings.

Officer's response:

Please refer to the below officer's response to Primrose Hill CAAC and the heritage section of the report.

5.14 Primrose Hill CAAC - Objection

- The height of the observation wheel would substantially harm the sense of scale of the Interchange Building, which is listed, and of the scale of the Lock Yard itself.
- Substantially harm the setting of the Listed Buildings and appear in long views of the Interchange building.
- The siting of the observation wheel which would disrupt the foot and cycle route which follows the canal towpath and uses the Yard.
- One of the appeals of the Market is the individuality of the different elements of interest, a standard set of shopfronts would harm the character and appearance of the conservation area.

Officer's response:

The introduction of the temporary observation wheel at a height of 40m, would have an impact on the local character and views. Officers agree with the conclusions of the Heritage Statement which considers that the observation wheel would cause temporary harm to the character and appearance of the Regent's Canal and Harmood Street Conservation Areas, and the special interest and setting of the Interchange Building Hampstead Road Bridge over Grand Union Canal, Hampstead Road Lock on the Grand Union Canal, Roving Bridge over Grand Union Canal, The Interchange Canal Towpath Bridge and Regent's Canal Information Centre (Lock Keeper's Cottage) listed buildings.

Officers consider that the public benefits of the scheme, including local workforce employment opportunities both during construction and post construction, the revealing of

previously inaccessible historic areas of the site (East Vaults/Dead Dog Basin) to the public and securing the refurbishment and repair of the historic buildings are, in principle, sufficient to outweigh the temporary harm identified to the heritage assets. Based on the evidence presented in the applicant's Heritage Statement and Planning Statement, at this stage GLA Officers consider that the public benefits could (where appropriately secured) outweigh the less than substantial harm.

The temporary observation wheel is proposed to be located within the West Yard which would not disrupt any such walking and cycling route from the towpath.

It could be argued the opening of the East Vaults, Dead Dog Basin and the introduction of an Observation Wheel will afford the Camden Lock Market further individuality and points of interests for market goers.

5.15 Friends of Regent's Canal - Objection

- It is proposed to deliver the observation wheel by road in sixteen shipping containers. No mention has been made of the canal or the River Thames as a means of transport for these containers. The consultants must rethink this proposal. The containers will travel by water from mainland Europe to the UK and it is in everybody's interests that they remain on the water until they reach their destination.
- The applicant is considering waste removal by barge. There should be no justification for using the road because this market is already using barges to transport waste to a recycling plant that specialises in handling construction waste.
- Even if there are no immediate plans to deliver or collect goods by boat, there is no good reason for excluding boats from the list of transport modes.
- Currently the recycling barges are towed away once they are filled up, which happens about twice a week, but if the passenger boats need to share this basin, as proposed, then the barges are expected to be towed away every morning, even if they are half empty. It seems to be a very inflexible arrangement to expect the industrial barges to vacate the space every morning when there is capacity in the basin for them to move to the other side.

Officer's response:

A planning condition will secure a viability assessment prior to the commencement of works to assess the viability in using the canal as a means of transport for the construction phase of the development.

A planning condition will seek to secure the use of boats to collect or deliver goods on site, however this will be subject to a viability assessment being completed.

An updated Service Management Plan will be secured via a planning condition.

5.16 Tenants & Residents Associations, Camden Town (TRACT) - Objection

- The market has developed over the past few years into a place best avoided by residents and a generator of noise, rubbish and anti-social behaviour.
- The proposed observation wheel is a nonsense.
- The sighting of it impacts the historic surrounding are including the listed bridge and the Interchange Building on Goods Yard.
- It is suggested that it will attract residents. There is no persuasive argument for this. The cost of a ticket is high, and residents have great views from local parks.

- The hours of operation are too long on a Sunday. It will allow users to look into previously private property.

Officer's response:

Camden Lock Market is a place for all people, and as a result of being one of the most popular destinations within Camden, and London, the market will attract a large number of visitors daily, which can contribute to noise pollution and waste. The Camden Lock Markets have an independent team who manage the waste collection onsite daily and ensure the site is as clean, safe, and welcoming as possible at all times. An Operational Management Plan would be secured by Section 106 to ensure that any noise issues are dealt with.

It is noted, the nearest residential buildings to the application site are on the west side of The Interchange building approximately 60 metres west of the application site along Gilbey's Yard. The proposal does not include amplified music and the music within the observation wheel gondolas would be contained within the sealed pod.

The applicant has partnered with iRecycle to enable the new facilities to service waste from the markets efficiently, including Stables Market and Buck Street Market. Waste from any refuse bins located around the market would be collected by the on-site facilities management team and transferred to the waste store.

The Applicant is committed to providing discounts to local schools and families to use the proposed temporary wheel. The exhibitions within the East Vaults will include local artists. This would be secured via Section 106 with an obligation for a Local Schools and Families Plan.

The hours of operation of the markets are not proposed to be altered as part of the application.

5.17 Harmood, Clarence, Hartland Residents Association - Objection

- The observation wheel would be seriously intrusive, without adding anything of cultural relevance.
- A fairground attraction of the kind proposed does not relate to anything which currently exists. Nor is there anything in the proposal which relates to Camden as a whole.
- It is most unlikely that the wheel would be of interest to residents. Even if it did generate an income for LabTech, it would have no spinoff for local businesses and no benefit to residents.

Officer's response:

The design of the observation wheel, which has an industrial appearance, has evolved following pre application advice. The industrial appearance of the temporary observation wheel links back to the history of the site and current architectural setting. The black metal finish would also be in keeping with other metalwork present in close proximity to the site, such as bridge parapets, lock gates and railings. As such, the design and materiality of the observation wheel would be sympathetic to the character of the West Yard.

As stated in the above paragraph, the industrial appearance of the temporary observation wheel links back to the history of the site and current architectural setting. The architectural detail in itself provides a link to the site which contributes to the fact the observation wheel would not appear out of place within the West Yard.

The proposed temporary observation wheel will create a new attraction to the Camden Lock Market and increase foot traffic to the site which will benefit the market traders, the Camden Town Centre, and local community.

5.18 **Camden Town Unlimited - Support**

- These plans will draw more people to Camden Town, helping businesses during a difficult time, therefore we support them.

5.19 An objection was raised by **Councillor Richard Cotton** in which he supported the issues raised by the Friends of Regent's Canal.

Representations summary

A site notice was displayed from 16/09/2022 to 10/10/2022 and a press advert was placed in the Ham & High on 22 September 2022.

5.20 **167 objections** were raised on the issues outlined below. These issues raised are considered in the relevant sections of this report.

Observation Wheel

- Devastating impact on one of Camden's most beautiful and distinctive places.
- The wheel will damage the area culturally and physically, reducing public space, blocking views of a heritage asset, and having a negative impact on residents and businesses.
- Serious concern that a temporary attraction could easily turn into a permanent fixture.
- Observation wheel does not reflect or link to the cultural history of Camden or the aspiration to revive culture and the arts.
- Unlikely to be of interest to local people, who the application seeks to address.
- The DAS refers to Camden's history of showmanship, the arts, music, and rebellious spirit. An observation wheel is something more associated with a provincial fairground attraction.
- The poor design (or lack of bespoke design) of the wheel is not appropriate to the design quality of Camden Lock and its value as a heritage asset.
- The physical presence of the 40m high wheel will be intrusive and damaging to the landscape and heritage of Camden Lock.
- The wheel will create over-looking for residents in apartment buildings on the opposite side of the canal and properties in close vicinity to CLM.
- Will the view of the city be better than that obtained from Primrose Hill or Parliament Hill for free?
- The observation Wheel will turn CLM into a theme park.

Jetty

- The displacement of the jetty to the Dead Dog Basin is hiding away the heritage from the application site.

Character

- Impact on character of Camden, Camden is unique, Camden shouldn't be changed, existing market is world famous.
- Proposal is out of character ('not very Camden').
- Removal of markets would impact on large number of people and would impact upon community.

- Proposal is gentrification.

Residential amenity

- There is already an existing noise issue from markets and events, the observation wheel will create additional noise impacts and loss of privacy.
- Litter needs to be managed.
- Demolition and construction noise.

5.21 **171 comments in support** were raised on the issues outlined below.

NOTE: Majority of the comments of support are from market traders.

- Opening up the East Vaults and Dead Dog Basin spaces to the wider community for the first-time providing exhibitions on the history of the Regent's Canal.
- Providing learning opportunities about the history of Regent's Canal is an important part of the history that needs to be recognised.
- Having an annual cultural events programme by showcasing and celebrating our diverse rich cultural heritage is welcomed.
- Free and discounted tickets to schools and the wider community would be welcomed.
- By opening up the East Vaults, Dead Dog Basin and installing an Observation Wheel young people in Camden will be able to explore the history of the Canal, Camden Market and the local area in a new and adventurous way.
- It is particularly welcomed that the new exhibition spaces will allow arts and performance relevant to those communities recognising the contributions of Black, Asian and other ethnic groups by offering a free platform to showcase their talents.
- Collaboration with University of the Arts - London Central Saint Martins and other educational institutions which is to be welcomed.
- It is important that Camden's industrial heritage is celebrated.
- The observation wheel will provide an important attraction for local families.
- The observation wheel will enable visitors to have a fascinating view of the Camden Market's heritage buildings from above as well as Regent's Canal and the landscape of London.
- The development would introduce a host of new job opportunities.
- There is desperate shortage of exhibition and performance spaces in Camden and we believe that these additional spaces will provide much needed facilities.
- iRecycle is a central part of the ongoing operation and if successful the new plans will see even greater waste recycling, consolidation and canal based movements helping Camden to become even greener in the process and providing significant ESG Markets for the Borough.
- Very beneficial for the community in Camden, and will attract more people which will help boost the economy.

6 POLICIES

6.1 National Planning Policy Framework (2021)

6.2 NPPG

6.3 The London Plan (2021)

6.4 Mayor's Supplementary Planning Guidance

6.5 Camden Local Plan (2017)

- C3 Cultural and leisure facilities
- C5 Safety and security
- C6 Access for all
- E1 Economic development
- E2 Employment premises and sites
- E3 Tourism
- A1 Managing the impact of development
- A3 Biodiversity
- A4 Noise and vibration
- D1 Design
- D2 Heritage
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- CC3 Water and flooding
- CC4 Air quality
- CC5 Waste
- TC6 Markets
- T1 Prioritising walking, cycling and car-free development
- T2 Parking and car-free development
- T3 Transport infrastructure
- T4 Sustainable movement of goods and materials
- DM1 Delivery and monitoring

6.6 Supplementary Planning Guidance

Camden Planning Guidance

- CPG Access for all
- CPG Design
- CPG Employment sites and premises
- CPG Energy efficiency and adaptation
- CPG Planning for Health and Wellbeing
- CPG Amenity
- CPG Air quality
- CPG Transport
- CPG Biodiversity
- CPG Town Centres and Retail
- CPG Water and Flooding
- CPG Developer contributions

ASSESSMENT

The principal considerations material to the determination of this application are considered in the following sections of this report:

7	Land use
8	Design and conservation
9	Impact on neighbouring amenity
10	Impact on usability of canal
11	Landscaping, public realm and trees
12	Accessibility
13	Land Contamination
14	Sustainable design and construction
15	Flood risk and drainage
16	Transport
17	Security and fire safety
18	Refuse and recycling
19	Employment and training opportunities
20	Planning obligations
21	Mayor of London's Crossrail CIL
22	Camden CIL
23	Conclusion
24	Recommendations
25	Legal comments
26	Conditions
27	Informatives

7 Land Use

7.1 The principal land use considerations are as follows:

- Introduction
- Utilisation of the East Vaults
- Utilisation of the Dead Dog Basin
- New retail shopfronts within West Yard
- Introduction of a temporary observation wheel (40m)
- Conclusion

Introduction

7.2 The proposed uses would be ancillary to the existing market use (sui generis).

Utilisation of the East Vaults

7.3 London Plan Policy HC5 states that development proposals should support the development of new cultural venues in town centres and places with good public transport connectivity; and enhance strategic clusters of cultural attractions. Policy E9 also states that development proposals should support London's markets in all their forms, complementing other measures to improve their management, enhance their offer and contribute to local identity.

7.4 The East Vaults are situated beneath the Grade II Listed Interchange Building to the west of the site and adjacent to Dead Dog Basin with access via the 'dead end' of Camden Lock Place or via West Yard. The East Vaults have been used as a back of house storage and waste facility for the Camden Market (part of the East Vault will continue to be used for this purpose) and has never been open to the public.

7.5 The opening of the East Vaults for the first time will provide an opportunity for a public exhibition on the history of the Regent's Canal, aspects of the Railway Goods Yard and Camden Market interpreting their impact on the development of Camden and showcasing a diverse cultural programme. It will include flexible exhibition space, a permanent cultural exhibition space for community groups and key stakeholders and a rolling programme of exhibition space working with local schools and groups. The rejuvenation of the East Vaults would provide a cultural and educational use for the Borough which would build upon the creative and cultural strength of Camden Town. To ensure the cultural space comes forward and to have some control over the content of the exhibitions, a Cultural Plan would be secured via Section 106, which would also ensure this space is free unless otherwise agreed.

7.6 The opening the East Vaults will contribute towards Policy C3 of the Camden Plan 2017 by enhancing Camden Town as a recognised destination for cultural activities, providing opportunities to protected groups (under the Equality Act 2010), enhancing vibrancy of the town centre and opportunities for youth and community groups to benefit from. The permanent cultural exhibition space will be open to the public free of charge. The provision of a free, cultural use here is strongly supported.

Utilisation of the Dead Dog Basin

7.7 A canal basin (known as Dead Dog Basin) is present wholly beneath the Interchange Building within the west of the site which connects to Regent's Canal to the south. The Dead Dog Basin is currently unused and is generally in a poor state with rubbish collecting in it.

- 7.8 The proposal includes the opening of the Dead Dog Basin to the public for the first time. The Dead Dog Basin is a covered water space underneath the Interchange Building which isn't being used to its full potential. As part of the proposal, a new jetty is proposed within Dead Dog Basin which would enable embarkation and disembarkation for passengers arriving on water boats.
- 7.9 It is noted, as part of the development, the existing jetty within the West Yard will cease operation and be repurposed to facilitate a temporary pedestrian bridge measuring 7.5m in length and 2.8m in width across the existing basin in West Yard for circulation to the temporary observation wheel as seen below:



Figure 3: Photomontage of proposed temporary footbridge over existing basin within the West Yard

- 7.10 Under the proposal, the basin would be dredged and brought back into use. Council Officers therefore support the opening of the basin and its use, rather than continuing as a derelict and unused space. The proposal would utilise a redundant space of a listed building and the redundant canal basin. This would provide a net heritage benefit.

New retail shopfronts within West Yard

- 7.11 The proposed development includes three new shopfronts in the West Yard, which will be placed directly south of the observation wheel along the Regent's Canal. It is noted the proposed shopfronts would be located in a close location to the four units being removed as a result of the proposed observation wheel. Temporary food stalls would be removed from the West Yard. There would be no loss of permanent market floorspace.
- 7.12 The proposed shopfronts will accommodate further food and beverage opportunities onsite in a location already surrounded by existing food and beverage land uses which contributes to the vitality of the market and supports the growth of the Camden Lock Market and Camden economy which is in accordance with Council's Local Plan employment policies.

- 7.13 Three units are being proposed and these units would be used for food and beverage and market retail. The shopfronts have been designed to complement the shopfronts approved last year in the Middle Yard (2021/5328/P).
- 7.14 The Applicant would phase the whole redevelopment of the market to ensure market traders can continue to trade during construction. The existing tenants have been kept fully informed of the proposed changes and would either be relocated within the Triangle Building in Stables Market or within the upgraded Market Hall Building in Camden Lock Market.

Introduction of a temporary observation wheel

- 7.15 The proposed development includes the installation of an observation wheel (40m high) with fifteen enclosed gondolas which could each accommodate twelve people within the West Yard, directly west of the existing basin. The introduction of a temporary observation wheel for a period of five years would support Camden Lock Market by generating additional footfall into the markets and Camden Town Centre. Camden Markets are an internationally recognised tourist attraction, and this is an established part of the character of Camden Town and the area commonly known as Camden Lock. The wheel would help to support the economic activity in the area and provide a boost to local businesses.
- 7.16 A supplementary ticket office is proposed within an existing ground floor unit off Camden Lock Place. The location of the ticket office will prevent queuing within the West Yard and is wheelchair accessible.
- 7.17 A number of objections were received regarding the introduction of a temporary observation wheel on the site. Concern was raised regarding the legitimacy of the observation wheel being temporary, citing the London Eye as an example of a structure which proposed to be temporarily at first but has now become a permanent structure and the effects on the market being turned into a theme park due to the proposed structure.
- 7.18 The proposed temporary observation wheel, just like other successful attractions at the Camden Lock Market and Camden Town, will continue to support the wider markets and local businesses by way of increased foot traffic.
- 7.19 The application is supported by a reinstatement strategy which details the removal of the observation wheel in a way that would not harm the significance of the site and would improve the heritage of the market through the associated works. This would be secured via Section 106. A condition is also included which will require the temporary observation wheel and associated pedestrian bridge to be removed at the end of the five year time period. If the applicant breaches this condition, then enforcement action could be taken.

Conclusion

- 7.20 The proposed development will provide a mix of Commercial (Class E), Market retail (Sui Generis) and exhibition/events (Class F1) uses and will provide a temporary observation wheel for five years.
- 7.21 Under the proposals, there would be an increase in floorspace of only 54sqm, however, an increase of approximately 497sqm of usable floor area towards Class E and Class F floorspace due to the opening of the East Vaults. The East Vaults are situated beneath the Grade II listed Interchange Building at the western end of the site, the vaults provide access to the area of water known as 'Dead Dog Basin'. The East Vaults are currently used as storage space for the market and are inaccessible to the public.

- 7.22 A number of letters of support have been received from market traders welcoming the proposed works due to the potential increase in foot traffic and dwell time at the site, which would be economically beneficial for any such market trader and the Camden economy. Camden Plan 2017 policy E1 Economic Development and policy E2 Employment Premises and Sites encourage employment uses and support economic growth.
- 7.23 Policy TC6 of the Camden Plan 2017 seeks to promote and protect markets in Camden, by resisting the permanent loss of market uses, considering the character of the existing market and supporting market development which does not cause individual or cumulative harm to the local area. The proposed development, which is located within Camden Town Centre seeks to upgrade the existing market and encourage footfall and dwell time, thereby increasing opportunities for market tenants. The proposed development is being phased, as this would be phase 1 of 3 of the redevelopment to ensure market traders can continue to operate during construction. Existing market traders would either be relocated within the Triangle Building in Stables Market or within the upgraded Market Hall building in Camden Lock Market, during the construction period. Although the proposals would see the loss of some food stalls surrounding the basin, these were approved on a temporary basis only, and there are numerous other food and drink stalls throughout Camden Markets and Hawley Wharf Market.
- 7.24 Officers consider that entertainment uses in the events and exhibition space support the vitality, viability and character of the market and the town centre and are therefore acceptable in principle. The amenity implications of the entertainment uses are considered later on in the report.
- 7.25 The proposals for the diversification of the market, delivery of a new cultural exhibition space, opening up the East Vaults to the public and provision of a temporary observation wheel are in line with the established use of the site and current strategic policy and are therefore supported in principle.
- 7.26 As such, the proposed land use package would support the market and allow it to diversify its offer. The package includes a mix of Commercial (Class E), Market retail (Sui Generis) and exhibition/events (Class F1) uses. There are a number of public benefits involved including the sustained and continued use of a major visitor attraction in Camden of international repute, the opening of the East Vaults and Dead Dog Basin, opportunities for the creation of new jobs and training and a new attraction to the market space.

8 Design and conservation

Heritage legislative and policy framework

- 8.1 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (Listed Buildings Act) sets out that special regard must be given to the preservation of a listed building, its setting or its features of special architectural or historic interest. Section 72 of the same Act sets out that special regard must be given to preserving or enhancing the character and appearance of a conservation area.
- 8.2 The proposal also includes an application for Listed Building Consent for the works to the Interchange Building. Section 16 of the Listed Buildings Act requires the local authority, when considering an application for a Listed Building Consent, to have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possesses.
- 8.3 Any harm arising to heritage assets should be mitigated as far as possible, for example, through the design and approach of the scheme. Considerable weight and importance must be given to

any harm to designated heritage assets, and any harm identified should be outweighed in the balance by considerable public benefits.

8.4 Paragraph 202 of the NPPF states:

202. 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.

8.5 There are also non-designated heritage assets in the area which are various unlisted buildings that make a positive contribution to the Regent's Canal Conservation Area.

8.6 Any harm to non-designated heritage asset is a matter of planning balance as set out in paragraph 203 of the NPPF:

203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

8.7 The development plan and the policies of the NPPF make clear that conservation and heritage are important factors that should be given considerable weight in decision making. The design and heritage policies set out in the Camden Local Plan (CLP) (Policy D1 and D2) and London Plan (LP) policy on heritage (Policy HC1) all note the importance of character and appearance. The development plan focuses on the potential impact of new development on the built environment, but also the impact on archaeological remains which may often be unidentified but discovered in the future. Development should avoid harm or minimise harm to designated heritage assets. The policies and NPPF also provide protection to non-designated heritage assets.

8.8 **Relevant heritage assets**

8.9 The Interchange Building is the only listed building on site and is grade II listed. The whole site is within the Regent's Canal Conservation Area. The site is also in an Archaeological Priority Area.

8.10 There are several buildings on the application site which are non-designated heritage assets – they make a positive contribution to the character and appearance of this part of the conservation area. Some of these buildings are historic and are associated with former industrial uses, including the perimeter buildings on the north and west side of the site, plus a former 19th century horse stair. They also include later 20th century examples built for the market, which was established at this time. They include two timber structures which are used for storage and associated uses, as well as brick market buildings and offices on the east side of the site, together with later 20th century glass and steel canopy structures, all of which are built in a high quality neo-Victorian style. Also of value on the site are the historic cobbled surfaces and various items of street furniture which contribute to the character of the space, together with a number of trees which are of particular value in this canal-side, semi-industrial environment.

8.11 The following plan shows the gradual development and historical evolution of the Camden Lock Market Area (CLM Area) which is associated with the application.



Figure 4 – evolution of some buildings and spaces in CLM Area

- 8.12 The following plan shows the heritage assets in the wider area. There are several listed buildings in the area, that are not on the application site itself, and some of these have impacts on their setting. However, the contribution of setting to the significance of the listed buildings varies for each asset. The key assets impacted are numbered below on the plan, and discussed further below with an assessment of the impact on significance. This part of the Regent's Canal Conservation Area, and the listed buildings labelled 1 – 7 form close links with one another through their setting within the CLM Area (referring to the section between Southampton Bridge and Hampstead Road Bridge).

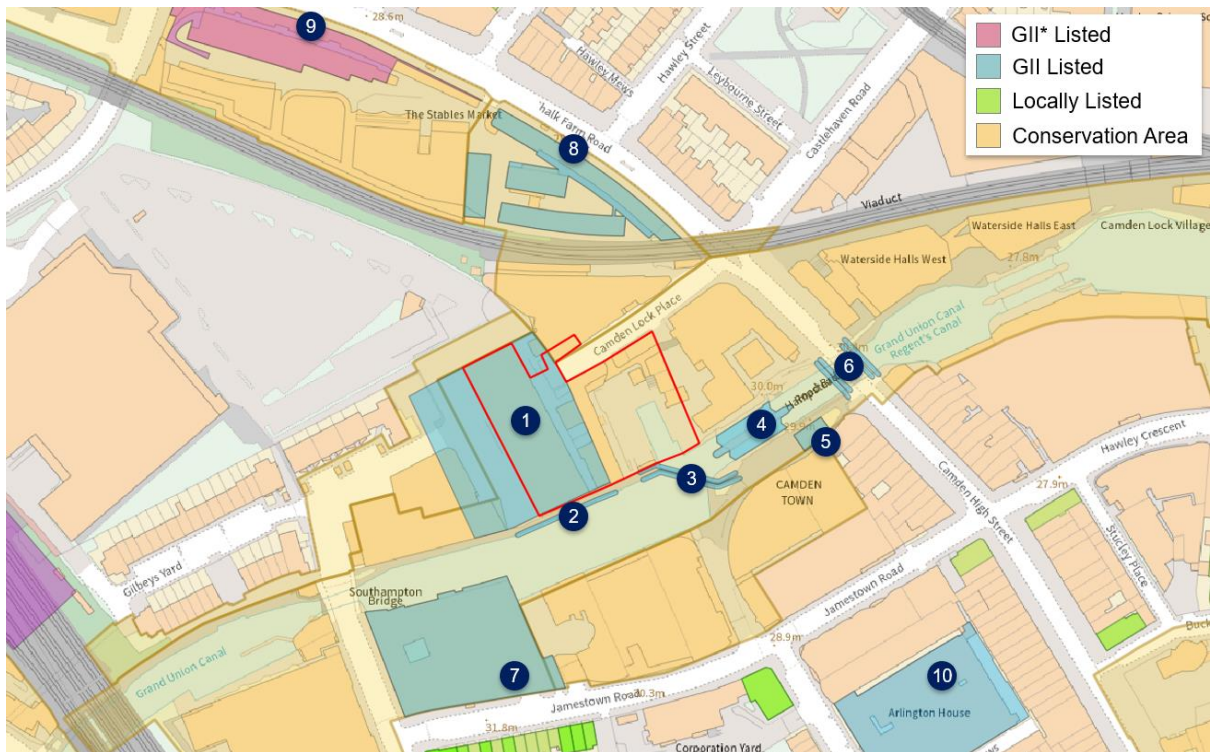


Figure 5 – Heritage assets in the area

1. Interchange Building (GII)
2. Interchange Canal Towpath Bridge (GII)
3. Roving Bridge (GII)
4. Hampstead Road Lock (GII)
5. Lock Keeper's Cottage (GII)
6. Hampstead Road Bridge (GII)
7. Former Gilbey House (GII)
8. Stanley Sidings Stables (GII)
9. Horse Hospital (GII*)
10. Arlington House (GII)

- 8.13 There are also several conservation areas further afield from the site and the wheel will be visible from certain points within some of these.

Regent's Canal Conservation Area

- 8.14 The site is located within Sub Area 1 (Camden Lock, Southampton Bridge to Kentish Town Bridge, Stanley Sidings and the Roundhouse) of the Regents Canal Conservation Area. The Regents Canal Conservation Area Appraisal and Management Strategy describes how the concentration of industrial archaeology along the Camden section of the canal, with its associated railway features is of exceptional interest and quality, unparalleled in London. It is an important feature of historic and visual interest in the wider townscape and, following the decline of traditional canal-related commercial activities, has been increasingly recognised as a valuable resource for water-based leisure activities, for its tranquil seclusion, for its ecological value and its potential for transportation and informal recreation. The ever-changing views, the variety and contrast of townscape elements, and the informal relationship between buildings and canal, make significant contributions to the character of the canal. These elements all contribute to the significance of the conservation area.

- 8.15 The CLM Area (the stretch of canal between Southampton Bridge and Hampstead Road Bridge) has a strong unified identity which is related to the industrial past of this area as an important

interchange and meeting of 19th Century rail, canal, and road infrastructure. The rail goods yards also extended north, towards the Roundhouse, but the intimate connection between the canal and the area south of Camden Lock Place give the buildings and spaces in this CLM Area an important group value. This character, which includes listed buildings 1-7, also contributes to the significance of this part of the conservation area.

8.16 Harmood Conservation Area

8.17 The conservation area's significance arises from the retention of a large proportion of the stock brick terraced houses of 'cottage' character, which form part of the original phase of 19th century development.

8.18 To the south are the railway structures of the former Goods Yard set behind the substantial brick retaining wall. These structures are of a contrasting scale and character of the residential character of the conservation area and wider townscape, with the definition of the wall providing a clear moment of transition. New, contemporary development within the market is visible as part of the context to the remaining historic railway structures. The distinction between railway structures and the residential context, of which the conservation area forms a part, is consistent with the historic development and character of the area, and contributes positively to its heritage significance through this setting.

Primrose Hill Conservation Area

8.19 This suburban townscape provides important evidential value for the evolution and development of this part of London in the 19th century and as such, contributes to the significance of the conservation area. To the south-west, the open spaces of Primrose Hill and Regent's Park form a green setting to the conservation area. These spaces complement the special interest of the conservation area and therefore contribute positively to its significance.

8.20 The elevated views from Primrose Hill are notable in London and have a long historical association as a key viewing point across the capital. The association has influenced the development of the conservation area and is considered an important element of its character and significance.

Regent's Park Conservation Area

8.21 The setting of the conservation area contributes to the significance of this conservation area. The contrast of the expansive landscape to the enclosing built development provides a strong boundary and a sense of separation from the wider urban context which is enhanced by the varied scale and shape of the London skyline.

Camden Town Conservation Area

8.22 Camden Town Conservation Area is of significance as a predominantly 19th century urban townscape consisting of two distinct character areas; a busy commercial and retail area and a quieter residential area. The area of setting in which the site sits does not contribute to its significance, other than a generally proportionate scale of urban development.

The Interchange Building (GII) and Interchange Towpath Bridge (GII)

8.23 The Interchange Building is a good example of a large-scale, late-Victorian warehouse with a prominent water tower, bold detailing and fire-proof construction and a result of being a key component of the Camden Goods Depot, one of the most complete examples of Victorian railway buildings in the country.

8.24 It is central to the history of the railway and canal operations in Camden Town and an important part of the CLM Area. Internally, it includes remnants of machinery dating back to its original use. The eastern section of the basement, which has the characteristics of a bonded warehouse, has for many years been used for storage. The central section of the basement contains Dead Dog

Basin, a significant offshoot of the canal in historic terms, albeit currently little known to the public and scarcely visible from the main stretch of the canal. These features and history contribute to its significance.

- 8.25 Also of importance to its significance is its setting in relation to the canal and the other rail/road/canal infrastructure which forms part of the historical interchange of which this building was also a key part. The significance of this area of setting is largely as described in the section on Regent's Canal Conservation Area. This strong association with the character of this part of the conservation area (the CLM Area as described above), and its group value and setting within the CLM Area, is a strong contributor to its significance.
- 8.26 The GII listed Towpath Bridge, which allows access under it into Dead Dog Basin, is rarely viewed and understood in isolation from the Interchange Building, mainly visible from the canal and the south side of the canal, as well as from the Roving Bridge. In these views, it is seen within the context and its close association with the Interchange Building. It is not on the application site and does not form part of the proposals. However, its setting also contributes to its significance, both through its association with the Interchange Building and the basin underneath, and through the wider connection with the historical industrial character of the CLM Area.

Roving Bridge (GII), Hampstead Road Lock (GII), Lock Keeper's Cottage (GII), Hampstead Road Bridge (GII), and Gilbey House (GII)

- 8.27 Each of the listed buildings in the CLM Area derives part of its significance from its setting and the group value with one another in this part of the conservation area. This is as set out in the above section on Regent's Canal Conservation Area and the Interchange Building and Towpath Bridge. The close industrial history, visual connection, and link to the canal, result in a strong historical character for the setting of these listed buildings which contributes to their significance. The most important contribution that this setting makes to significance is for the Roving Bridge and the Lock, with direct connections through and across the canal into the CLM Area.
- 8.28 There are other contributing factors of significance for each of these listed buildings, but these are not impacted by the proposal.

Stanley Sidings Stables (GII) and Horse Hospital (GII*)

- 8.29 These listed buildings are within the section of the conservation area which extends north towards the Roundhouse. Although they form part of the historical industrial past of this interchange area, they are further removed from the canal and have a stronger association with the rail infrastructure and warehousing. Their setting contributes to their significance, but the site to the south has a degree of physical separation which means its particular contribution is limited.

Arlington House (GII)

- 8.30 The building is one of London's largest and last Rowton Houses, providing accommodation for working class single men in the late C19 and early C20. Its significance largely derives from the architectural and historical significance of the building. It is surrounded by modern buildings on Arlington Road and Jamestown Road, and the views of the imposing building, north on Arlington Road towards the application site, just present lower quality modern buildings in the backdrop setting. As such this setting does not contribute to its significance.

Impact of proposals

Works to the Interchange Building – no harm

- 8.31 The internal works to the interchange building are low impact in terms of fabric. For example, conduits are mounted on clips around the original joists, or into the mortar joints in walls. The partitions to the internal space will disrupt the open floorplan, but the partitions are kept to a minimum. Blockwork generally follows existing structural grids, with the head of blockwork

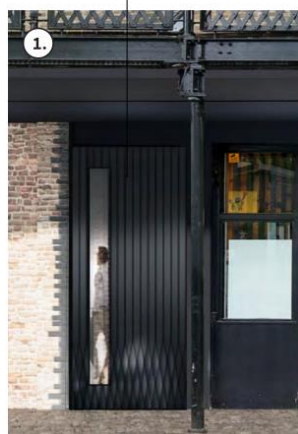
terminating at the base of a steel joist and tied to posts, or terminating at the apex of the vaulted brick arches. This allows the original spaces, and the interventions in them, to be clearly understood from within the spaces. It also allows for suspended ceilings and plasterboard partitions to be constructed within the new partitioned areas. Overall, the works have been designed to minimise any interruption in the plan form or internal structural detailing, allowing it to be easily reversible and requiring minimal mortar repairs when reverting. This means the impact on the significance of the interchange building, insofar as it derives from the internal layout and structure, is negligible and not harmful, preserving this part of the significance of the listed building when viewed in isolation.

- 8.32 The more significant interventions require some new openings in brickwork and these more structural interventions have a greater impact on the historic fabric and construction of the building. The jetty is new and introduces a new feature to the basin. However, these works have again been minimised and planned to as to limit impact. The number of openings, for example to allow access and visibility to the new jetty, have been planned to leave significant amounts of the structural brickwork and the remaining brickwork and features allow the building and spaces inside the vaults and basin to be understood in their historical context. The new entrance into the vaults under the Interchange Arch, at the end of Camden Lock Place, would be a significant improvement over the current access and appearance to this part of the listed building which currently detracts from its significance. The removal of insensitive alterations from the existing vaults, like paint from the brickwork and plastic gutters from the joists, and refurbishment of original features like the hanging fire doors and mechanical hoists, would also be a notable improvement to this part of the building. The works to the vaults and basin in the Interchange building serve to ultimately improve the general condition of the building, provide public access to a space which is currently under-used and will better reveal the significance of this part of the building (the upper floors are occupied by offices and are not publicly accessible).
- 8.33 Overall, the works to the building are a sensitive adaption that would better reveal the historical significance of the building providing public access to an interesting and important part of the former industrial building of national significance. Considered in the round, the alterations to the Interchange Building, in the east vaults and Dead Dog Basin, would enhance its special character, enhancing and better revealing its significance. The works, insofar as they are visible from outside the building, would also enhance the character of the CLM Area (and so the Conservation Area) and the contribution to significance made by this setting in respect of the Interchange Building.

Works to West Yard – no harm

- 8.34 The works to west yard largely involve improvement and renewal works to the buildings, alongside the works to the basin which are associated with the observation wheel (see section below). The most significant works to the west yard, excluding the works for the wheel, are the new unit frontages to the west elevation buildings (also providing access into the East Vaults under the Interchange Building) and the pavilion building which would provide additional market stalls. The proposed black frames and patterned surrounds and kick-plates and stall risers compliment the industrial character of this part of the conservation area and the surrounding listed buildings. The approach is taken with new unit shopfronts/facades, as well as the proposed pavilion building. The current unit facades on the west elevation are inconsistent and vary in quality, with some timber fronts more sensitive than the fully glazed commercial fronts on other units. The proposed unit facades, shown below, would bring a more consistent and high-quality finish preserving the character of the CLM Area.

Patterned black metal door with a glazed panel, and black frames painted black.



Glazed bi-folding doors with a patterned kick plate, and black frames and surrounds painted black.



Glazed side lights with a patterned mesh behind.

Glazed door with black frames and surrounds painted black.



Figure 6 – West yard unit fronts

- 8.35 The proposed pavilion building would replace a small brick store building with a pavilion that houses new market units, constructed in block, black metal and timber. The existing store and plan room is of no heritage significance and has a neutral contribution to the character of the CLM Area. Its replacement with a building of similar scale, but higher quality design with a more industrial aesthetic would preserve the character of the CLM Area.
- 8.36 The various access points into the West Yard would remain, preserving the character of this network of spaces, alleys, under crofts, and paths, all of which contribute to the significance of the conservation and setting of the listed buildings (which also contributes to their significance).
- 8.37 Overall, the works to the West Yard would result in a moderate enhancement of the character of the CLM area, and this character contributes to the significance of this part of the conservation area, and the significance of the nearby listed buildings due to the contribution of their setting. This is the case for the Interchange Building, the Towpath Bridge, the Roving Bridge, and the Lock.

Observation wheel and associated structures – less than substantial harm to some assets

CLM Area

- 8.38 This section considers the impact on the CLM Area – that being the Regent's Canal Conservation Area and listed buildings numbered 1 – 7 (The Interchange Building (GII), Interchange Towpath Bridge (GII), Roving Bridge (GII), Hampstead Road Lock (GII), Lock Keeper's Cottage (GII), Hampstead Road Bridge (GII), and Gilbey House (GII)). Because the impacted significance of these assets derives in large part from the shared character and setting in the CLM area, the impact of the wheel is very similar. The level of impact varies between some of the assets, as set out below, mainly due to the variation in viewing points and proximity of assets to the wheel.
- 8.39 The 40m high temporary observation wheel, and the associated basin bridge, decking and canopy, are temporary structures, but the impact would be sustained for several years. It is a visually permeable metal framework structure that has a clear and simple industrial appearance. The black metalwork provides a reference to the character of the CLM area and the metalwork found within this part of the conservation area, and on many of the listed buildings such as Roving Bridge, the Towpath Bridge, and Hampstead Road Bridge. The scale and shape of the observation wheel would be a symbol of the more recent leisure character of the area and a clear later addition to the industrial heritage, visible from some distance and a notable presence in the setting of the listed buildings.

- 8.40 As a result of this contrast with the current character, the scale and shape of the structure would harm the character of this part of the CLM Area, and the contribution it makes to the significance of heritage assets. The use of materials, colour and design, together with the visually permeable nature of the structure, minimises and mitigates the harm through use of a contextual and industrial aesthetic. It is not a solid building in the traditional sense and so does not block views to, across, and within the CLM area, mitigating any impact. For example, the impact of an actual tall building on this site would be very different, and clearly far more of an impact in near and longer views, so applying tall building policies as in Local Plan policy D1 or London Plan policy D9 in the same way would be inappropriate. The policies are still relevant insofar as they require structures to address their visual, functional, environmental, and cumulative impacts as has been discussed in this report.
- 8.41 Historic England has highlighted the movement as being a contributory factor to harm the setting of the Interchange. Although the movement may draw the eye from certain views, officers do not think this causes harm. Historically this part of the conservation area and the immediate setting would have been a busy and dynamic interchange of road, rail, and canal with constant movement and activity generated by the industrial activity and machinery. Movement – transport of goods, interaction of people and animals etc - is a fundamental and significant part of the history of the site. Furthermore, the use of new industrial engineering techniques in the C19 and early C20 to provide observation wheels (at Earls Court and Blackpool) for leisure was relatively common.
- 8.42 The impact of this wheel on significance would be most keenly felt by the **Regent's Canal Conservation Area, The Interchange Building, Towpath Bridge, and Roving Bridge** (buildings 1 – 3). This is because of how close they are, and to the impact and disruption to near views between these assets and settings would be more marked. The image below shows a view from the Roving Bridge, with the Interchange Building to the left – the Towpath Bridge is just out of shot to the left.



Figure 7 – View of West Yard from Roving Bridge

- 8.43 The impact would be lesser for those assets further afield (listed buildings (4 – 6) as the relationship to the space changes is mid distance views. The view below shows the wheel in the West Yard, taken from just to the west of **Hampstead Road Bridge** – The **Lock Keepers Cottage** can be seen to the left of the image and **Hampstead Road Lock** in the centre. There would still be less than substantial harm to their significance from this impact on their setting, but it would be less than those assets mentioned above and at the low end of less than substantial.



Figure 8 – View to the wheel from the canal, west of Hampstead Road Bridge

- 8.44 The impact on former **Gilbey House** (listed building 7) is less marked as its connection to the rest of the CML Area has far more visual separation, although it's industrial heritage still allows for a historical connection. The impact therefore would be at the lowest end of less than substantial.
- 8.45 The canopy and bridge over the basin are more minor and would only really be experienced closer to the west yard and vantage points like the Roving Bridge. The width of the bridge over the basin was made narrower in response to feedback from officers and the DRP, and as a result, the basin can still be clearly seen and understood in its historical context. The character and appearance of this part of the conservation area would be preserved as a result of these additions, as would the setting of the listed buildings.

Observation Wheel on Harwood Conservation Area – less than substantial harm

- 8.46 As set out above, part of the significance of Harwood Conservation Area drives from its setting and the contrast with the industrial goods yards and CLM Area to the south. The wheel would be visible along Harwood Street, altering the skyline and introducing a tall new element, alongside Euston Tower and the BT Tower in the backdrop. As a result, there would be harm to this setting, altering the scale of the industrial development to the south. However, the already varied and modern skyline means this harm would be less than substantial, and at the lower end of the scale.



Figure 9 – View from Harwood Street

Observation Wheel on Primrose Hill Conservation Area – no harm

- 8.47 The proposed observation wheel would be visible from the summit of Primrose Hill. From this viewpoint, the mid to upper levels of the observation wheel would be experienced beyond the adjacent Interchange Building within Camden Lock Market, with the landmark tower remaining legible. There would be no overall harm or improvement to the view, and so the effect would be neutral, preserving the character and appearance of the conservation area.

Observation Wheel on Regent's Park Conservation Area – no harm

- 8.48 There would likely be several glimpses of the top of the wheel between buildings at certain points within the north east corner of Regent's Park. However, this would be consistent with the contrasting characters of expansive landscape and surrounding urban development. As such, the effect would be neutral, preserving the character and appearance of the conservation area.

Observation Wheel on Camden Town Conservation Area – no harm

- 8.49 There would likely be several glimpses of the top of the wheel between buildings at certain points within the conservation area, but most visibility would be in views north along Arlington Road. However, the setting here is an evolving urban context and modern buildings are visible alongside older buildings (like Arlington House). The wheel would be a taller element in the termination of this view, but its modern but industrial appearance and slender form would minimise the impact not changing the overall scale of the setting. As such, the effect would be neutral, preserving the character and appearance of the conservation area.

Stanley Sidings Stables (GII) and Horse Hospital (GII) – no harm*

- 8.50 These listed buildings are further removed from the canal and have a stronger association with the rail infrastructure and warehousing. Their setting contributes to their significance, but the site to the south has a degree of physical separation which means its particular contribution is limited. More modern buildings can also be seen in the backdrop and the proposed wheel will appear as a metal framework structure with an industrial aesthetic in the backdrop. As such,

although it would alter the setting, it would preserve the contribution it makes to the significance of the listed buildings.



Figure 10 - View over the Stanley Sidings Stables

Arlington House (GII) – no harm

- 8.51 The setting to the north provides a broadly proportionate scale for the listed building. The wheel would be a taller element in the termination of views north along Arlington Road, but its modern but industrial appearance and slender form would minimise the impact and not change the overall scale of the setting. As such, the effect would be neutral, preserving the character and appearance of the conservation area.

Impact in longer views.

- 8.52 Consideration has been given to the protected views identified in the London View Management Framework SPD (LVMF). The site is located within the following protected views:

LVMF View 2B: Parliament Hill – east of the summit.

- 8.53 The Site is in the middle ground of the View, just west of the designated view. The Palace of Westminster is the key feature in this view and the London Views Management Framework states that 'the viewer's ability to perceive the visual relationship between the Clock Tower, the Central Tower and the Victoria Tower should be maintained or enhanced.' The proposed wheel would maintain this view in line with policy.

LVMF View 4A: Primrose Hill Summit – the summit

- 8.54 The site is in the close to middle distance of View 4A.2, far north of the designated view. The focus of this view is St Paul's Cathedral with its distinctive peristyle, drum, dome and western towers. The London Views Management Framework states that 'The scale of new developments should be compatible with the composition of the view.' The proposed wheel would maintain this view in line with policy and add visual interest to the city skyline in the middle ground.

- 8.55 Views relating to Regents Canal are also recognised in the Local Plan as being locally important, contributing to the interest and character of Camden. In accordance with Policy D1 Design, new

development should be compatible with these views in terms of setting, scale and massing, and should have regard to local skylines and landmarks.

- 8.56 The assessment of visual effects identified that there would be negligible changes to local and longer distance views arising from the proposed development, principally caused by the temporary observation wheel. In views from the local streets, which are aligned towards the site, the observation wheel would be more noticeable and form a visually interesting, temporary landmark. In views where the observation wheel would be experienced square on, clear spacing between the wheel spokes would allow for open sky to be experienced beyond and together with the rounded gondola design would maximise its visual permeability. The black metal finish would also be in keeping with other metalwork present in these views such as bridge parapets, lock gates and railings. In many places, it would add visual interest to the skyline.

Archaeology

- 8.57 The site is situated within an Archaeological Priority Area, designated for the canal side industries which developed during the 19th century. With regards to archaeological remains, the proposal includes the introduction of new exhibition space, flexible events and market uses through a change of use of the existing East Vaults, installation of new retail shopfronts within West Yard; creation of a new jetty within Dead Dog Basin and erection of a temporary observation wheel together with ancillary works and alterations to existing structures, surfaces and other public realm improvements and associated works. An Archaeological Desk Based Assessment has been submitted as part of the application.
- 8.58 The Greater London Archaeological Advisory Service (GLAAS) were consulted on this application and advised that they did not object to the proposals provided that the observation wheel was secured as a temporary installation and did not become a permanent feature, to ensure there was no permanent harm to the character and appearance of the area. Likewise, they had no objection to the works to the east vaults subject to a number of suggested conditions requiring a written scheme of investigation.

Conclusion

- 8.59 Less than substantial harm has been identified to several designated heritage assets, as set out above. The impact on these assets has been minimised and mitigated by the design of the proposed wheel and associated structures. The temporary nature of the works also further mitigates the impact by ensuring that the identified harm is temporary. Considered cumulatively, and taking account of the heritage benefits of the scheme, there is still a net harm to the assets listed. The harm is less than substantial.
- 8.60 In accordance with paragraph 202 of the NPPF, where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In carrying out this balance, in accordance with the statutory requirements, considerable weight and importance should be attached to harm to designated assets.
- 8.61 Officers consider that the public benefits of the scheme, including local workforce employment opportunities both during construction and post construction, the revealing of previously inaccessible historic areas of the site (East Vaults/Dead Dog Basin) to the public and securing the refurbishment and repair of the historic buildings are, in principle, sufficient to outweigh the temporary harm identified to the heritage assets. Similarly, GLA Officers consider that the public benefits could (where appropriately secured) outweigh the less than substantial harm caused.

9 Impact on neighbouring amenity

9.1 The considerations on the impact on the amenity of neighbouring properties are as follows:

- Policy review
- Overlooking
- Daylight and sunlight
- Noise and disturbance
- Proposed uses
- Construction works

Policy review

9.2 Policies A1 (Managing the impact of development) and A4 (Noise and vibration) are relevant with regards to the impact on the amenity of residential properties in the area. Collectively, they seek to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. In this case, the primary concerns include impact on daylight and sunlight, overlooking, outlook, noise, and disturbance.

Overlooking

9.3 The overlooking or visual intrusion to residential properties from the proposed observation wheel is impactful however, due to the distances of over 60m, it is considered not to be significantly impactful. The guidance on separation distances between windows serving habitable rooms is normally 18m. In addition, that area of Camden Town, around the Camden Local Markets and the canal, already are busy tourist destinations and have been for decades. However, the increased height of viewing opportunities will lead to a greater perception of overlooking and the opportunity to see into higher floors of adjacent buildings. The nearest flats would be 51.92m away to the south-east, across the canal. This is well in excess of the normal guidance on separation distances and also well in excess of the distance between the viewing platform of the Tate Modern extension and the nearby flats as per the Supreme Court decision in *Fearn and others vs Board of Trustees of the Tate Gallery* (2023), which is 34m. Furthermore, views would be oblique, as opposed to the direct views involved in the Tate case.

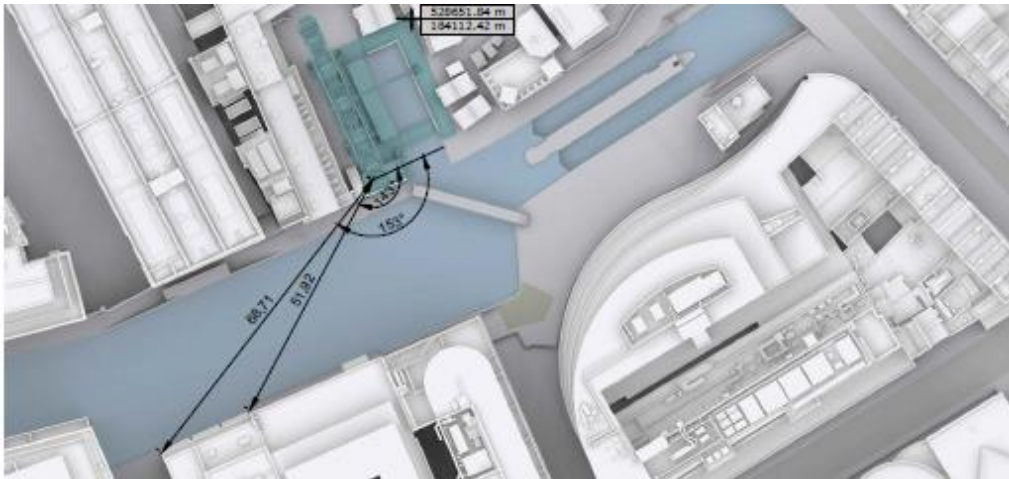


Figure 11 – The distance between the proposed wheel and the nearest residential properties



Figure 12 – The nearest residential properties are located in the middle building with the glass balconies

Daylight and sunlight

- 9.4 The observation wheel will not be a solid structure. The nearest residential buildings to the application site are on the west side of The Interchange building approximately 60 metres west of the application site along Gilbey's Yard. It is not considered that the site will adversely impact outlook along this road due to the large Interchange Building separating the two sites, and the openness of the observation wheel which still provides ample opportunity for views and sunlight through the structure, and nor would it, therefore, affect the levels of daylight and sunlight reaching residents along Gilbey's Yard.
- 9.5 Residents on the upper floors of 246/248 Camden High Street have a clear line of sight of the proposed temporary observation wheel, which is located approximately 120m to the east of the site. The existing Dingwall's building and mature tree located onsite will somewhat hinder the visibility of the proposed temporary observation wheel. Given the distance between the upper floor units at 246/248 Camden High Street and the proposed temporary observation wheel, and the open nature of proposed observation wheel allowing for views to the Interchange Building, it is considered that the impact on the outlook, privacy and amenity will not be harmful to the residents at 246/248 Camden High Street.
- 9.6 The uses surrounding the application site comprise mostly of retail at ground floor, with ancillary retail or office space on the upper floors. The areas that will be most affected by the proposal are those immediately north of the site, to the north of Camden Lock Place. Much like the surrounding area, this area comprises retail units at ground and upper floor level. Retail is not considered a sensitive use and it is not therefore considered that an unacceptable level of overshadowing would occur.
- 9.7 Due to the separation distances between the application site and the commercial nature of surrounding buildings, there would be no impact in terms of daylight and sunlight on the surrounding area is an issue for concern.

Noise and disturbance

- 9.8 Paragraph 185 of the NPPF, and policy D14 of the London Plan states that planning policies and decisions should aim to reduce, manage and mitigate noise to improve health and quality of life arising from noise as a result of new development, including through the use of conditions. They also set out that decisions should not impose unreasonable restrictions because of changes in nearby land uses since they were established. Camden Policy A1 and A4 seek to manage impact of development and ensure that noise and vibration from noise is controlled and managed.
- 9.9 A Noise Impact Report has been submitted in support of the application which states that an acoustic survey was undertaken in July 2021 to establish the existing environmental sound levels around the application site. It found that the dominant noise sources are generated from road traffic, freight train passes and market activities. An Operational Management Strategy would be secured via Section 106 to ensure noise and disturbance are dealt with.
- 9.10 In terms of noise intrusion, the Environmental Health Officer has advised that the noise criteria have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the surrounding buildings. The proposal does not include amplified music. The music within the observation wheel gondolas would be contained within the sealed pod. As such, the submitted acoustic submission complies with the Camden Plan guidelines and therefore is acceptable in environmental health terms, subject to conditions.
- 9.11 Robust noise conditions are suggested, so that the external noise level emitted from plant and machinery equipment is at an acceptable level when measured from the nearest noise sensitive receptors. A condition is attached to ensure that no amplified noise can be heard outside the wheel.

Proposed uses

- 9.12 Whilst it is acknowledged that the proposed use of the site has the potential to generate a significant amount of noise, it is accepted that the Camden Lock Market already generates a significant amount of noise through its daily use. Nevertheless, noise issues do arise from the markets and the proposals must not worsen the situation. As stated above, there is a natural physical separation distance between the application site and the nearest noise sensitive receptors. There are also no residential units proposed as part of this application. This separation of noise sensitive uses is therefore considered appropriate. Whilst it is likely that the proposed improvements to the pedestrian circulation in and around the site will increase levels of pedestrian activity in areas which are not currently apparent, it is considered that the separation distance between the site and the noise sensitive receptors is great enough that the residential amenity of nearby occupiers of the surrounding areas will be preserved. It should be noted that the proposals do not include any bars or restaurants but a family attraction with a limited footfall. The Operational Management Plan secured via Section 106 would allow the Council to maintain control with regards any noise and disturbance issues that arise.
- 9.13 In terms of noise generation from visitors and tourists, the ambient daytime noise levels that would be created here are commensurate with what is to be expected with a vibrant and busy town centre such as Camden Town Centre, which is the largest of Camden's designated town centres. The site already accommodates large visitor and tourist numbers. It is recognised that a number of potential night time economy uses, such as Commercial (Class E), Market retail (Sui Generis) and exhibition/events (Class F1), and erection of a temporary observation wheel has the potential to generate a noise nuisance. Currently, there are no planning restrictions on the hours of use for the site, which is controlled by environmental health licensing. However, given that an increase in entertainment uses is proposed on site, the Operational Management Plan would be secured via

a Section 106 legal agreement in order to detail the manner in which the public leave the premises in the early hours of the morning to ensure that disturbance to nearby residential areas is mitigated. The proposed hours of use for the wheel and exhibition space are Monday-Friday 9am to 7pm, Saturday 9am to 11pm and Sunday 9am to 11pm. These hours would be secured in the Operational Management Plan. Conditions are also suggested regarding sound insulation to the pods and noise emanating from uses.

- 9.14 It is apparent on site that a considerable amount of litter has gathered within Dead Dog Basin as a result of passing pedestrians disposing of their litter from the bridge suspended above the Basin. There is concern that as a result of the proposed temporary bridge over the Canal Basin that further litter could be disposed of within the canal. A Litter Management Strategy will therefore be secured via a Section 106 Legal Agreement to ensure that the Canal is maintained on a regular basis. A financial contribution of £8,500 per annum for 9 years would also be secured in order to achieve this. The new bridge over the basin would be temporary, as well as the observation wheel. The exhibition space would be permanent.

Construction works

- 9.15 Camden Policy A1 states that Construction Management Plans should be secured to demonstrate how a development will minimise impacts from the movement of goods and materials during the construction process (including any demolition works).
- 9.16 With regards to noise disturbance from construction, a Construction Management Plan would be secured by a section 106, which would require controls on hours of construction and deliveries of materials. This is the standard procedure secured for all major developments. A CMP support fee of £9,927.46 and a bond of £15,000 would be secured also.

10 Impact on usability of canal

- 10.1 Dead Dog Basin is currently unused and is generally in a poor state with rubbish collecting in it. Under the proposal, the basin would be dredged and cleaned up and brought into use. A jetty is proposed within the Dead Dog Basin which would be relocated from the existing basin canal within the West Yard. Given that the basin is not in freight use and has not been for decades, officers consider that it would be unreasonable to require the applicant to bring the basin back into its original freight use. Officers therefore support the opening up of the Dead Dog Basin and its use, rather than continuing as a derelict and unused space. The proposal would utilise a redundant space of a listed building and the redundant canal basin. This would provide a net heritage benefit.

11 Landscaping, public realm and trees

- 11.1 The Landscaping, public realm and trees considerations are follows:

- Designations
- Proposed landscaping and public realm
- Trees

Designations

- 11.2 The Regent's Canal including towpath is designated as Public Open Space (POS) the site is partially within the London's Canals Site of Importance for Nature Conservation (SINC), identified as being of Metropolitan Importance.

Proposed landscaping and public realm

- 11.3 The site is predominantly hard standing with the only soft landscaping around trees in the West Yard. Much of the hard standing is made up of historic granite setts. These will be retained and

reused where possible and a condition is attached accordingly. However, the retention of these must be balanced with accessibility (see section below). The applicant will also provide additional planting onsite and railings to further protect the existing vegetation and trees onsite which is secured via condition.

Trees

- 11.4 There are currently four trees from mature to semi-mature located on the site within West Yard. The tree species consisted of a black locust *Robinia pseudoacacia*, Norway maple *Acer platanoides* and deceased weeping willow *Salix babylonica*. A weeping willow *Salix babylonica* is also located within the south-east of the Site next to the canal.
- 11.5 The trees will not be impacted as a result of the proposed development, however a deceased tree is proposed to be removed and replaced with a new *Robinia pseudoacacia*, which is secured via condition.

12 Accessibility

- 12.1 A Design and Access Statement as well as an accessibility statement were submitted as part of the application.
- 12.2 It is proposed that the granite setts (cobble stones) will be maintained as much as possible. However, this surfacing presents accessibility issues and therefore the heritage assets of the site need to be balanced with accessibility. A condition is attached requiring details of this.
- 12.3 The temporary observation wheel is accommodated with a temporary decking providing ramps for improving the current conditions. The wheel itself will be accessible. The existing entrances to West Yard remain undisrupted. A temporary bridge across the basin is proposed to improve circulation around the open yard and link the east-west towpaths for a more direct connection between the two sides. All entrances, access to the wheel, and connections to East Vaults are provided via ramped access and level gradients to maximise level access.
- 12.4 After the removal of the temporary observation wheel, the applicant will conduct reinstatement works of the West Yard hard landscaped surfaces, in accordance with the reinstatement strategy report. A condition is attached accordingly.
- 12.5 Policy D5 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). The applicant has submitted design and access statement which ensured that the development: can be entered and used safely, easily and with dignity by all; is convenient and welcoming with no disabling barriers; and provides independent access without additional undue effort, separation, or special treatment. As such, the application complies with the London Plan in respect of inclusive design.
- 12.6 Officers are satisfied that accessible routes have been provided and that the need for these has been balanced with heritage concerns.

13 Land contamination

- 13.1 A Council Environmental Health Officer has reviewed the proposal and considers that due to the extent of the proposals and the historical industrial uses of the land that a full standard contaminated land condition is required. Given the findings of the submitted ground contamination and geotechnical interpretative report and the comments from the Environmental Health Officer, the proposal is acceptable in terms of land contamination subject to this condition.

14 Sustainable design and construction

14.1 The considerations in terms of sustainability credentials of the scheme are as follows:

- Policy review
- The site and the proposal
- Energy
- Sustainability
- Air quality
- Biodiversity enhancements

Policy review

14.2 Pursuant to London Plan policies 5.2, 5.3, 5.6, 5.7, 5.9, 5.10, 5.11, 5.12, 5.13, 5.14, 5.15 and 5.17, Camden Local Plan policies CC1, CC2, CC3, CC4 and CC5, all developments in Camden are required to make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

The site and the proposal

The proposal for an observation wheel and exhibition space is in a highly accessible location easily reached by public transport, bike or on foot and therefore the principle of the scheme in terms of location/use is sustainable.

14.3 The principle of the scheme is therefore highly sustainable.

Energy

14.4 The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2013 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.

14.5 An energy statement has been submitted with the application.

14.6 As a non-domestic proposal, the development is estimated to achieve a 57% reduction in CO2 emissions compared to 2013 Building Regulations. The development falls short of the net zero-carbon target in Policy SI2 of the London Plan, although it meets the minimum 35% reduction on site required by policy. As such, a carbon offset payment is required to be secured by S106 of £89,100.

14.7 A large proportion of the site involves the retention and refurbishment of existing buildings with a total floorspace increase of 54sqm (GIA). This is in accordance with CC1 and will help limit embodied carbon emissions associated with the development.

Sustainability

14.8 BREEAM 'very good' will be targeted. A BREEAM pre-assessment has been undertaken using the scope described, and a target rating of Excellent (70%) is deemed to be achievable with a target score of 71.15%.

Air Quality

14.9 Policy CC4 of the Local Plan and CPG Air Quality are relevant with regards to air quality.

14.10 The site is in an Air Quality Management Area (AQMA) for exceedances of the 1-hour and also annual mean NO₂ objectives and 24-hour and annual PM₁₀ objectives. The site is also within the

Camden High Street from Mornington Crescent to Chalk Farm and Camden Road Air Quality Focus Area (AQFA).

- 14.11 The applicant has completed an air quality assessment which demonstrates the proposed development is judged to be not significant. As such, the proposed development can be considered acceptable and in line with the relevant planning policies. The development will be 'Air Quality Neutral'.

Biodiversity Enhancements

- 14.12 There is a limit to how much green space the site can take, given the hardstanding nature of the markets and the amount of footfall. Nevertheless, a condition is attached requiring details of landscaping, including the tree proposed. A condition is attached requiring details of external lighting. The Canal and river Trust would be consulted on these details to ensure there was no material impact on wildlife along the canal.

Removal of wheel

- 14.13 The temporary observation wheel has a design life of approximately 40 years but would only be used on site for 5 years. The wheel is designed to be disassembled and reused, in its entirety, offsite after 5 years. A Section 106 obligation is attached requiring details of what will happen to the wheel when it is dismantled, to ensure that the parts are reused or recycled.

15 Flood risk and drainage

- 15.1 Policies CC3 is relevant with regards to flood risk and drainage.
- 15.2 The site is not located within a Flood Risk Zone based upon Camden Flood Risk Management Strategy maps and is not identified as a street that flooded in either 1975 or 2002.
- 15.3 A Sustainability Statement has been submitted as part of this application, which includes a Flood Risk Assessment. The Local Lead Flooding Authority has assessed the proposal and has no objections.

16 Transport

- 16.1 The following transport considerations are covered below:

- Policy review
- The site
- Travel plans
- Car parking
- Cycle parking
- Management of construction impacts
- Pedestrian, Cycling, and Environmental Improvements
- Conclusion

Policy review

- 16.2 Camden Local Plan policies T1, T2, A1 and the Transport CPG are relevant with regards transport issues. The overarching aims of the Council's transport policies is to consider the impacts of movements to, from and within a site, including links to existing transport networks.

The site

- 16.3 The site has a PTAL rating of 6a (Excellent) on a scale of 0 to 6B, where 6B represents the greatest level of access to public transport services. Camden Town Underground Station is the

closest station, located approximately 350m to the south. Camden Road Station is located approximately 450m to the east and is served by Overground services. There are numerous bus services along Camden High Street and Chalk Farm Road.

Travel plans

- 16.4 This development will lead to an increase in the number of visitors to the area, with around 20% increase due to the temporary observation wheel and opening of the East Vaults which will lead to higher pressure on local transport infrastructure. The site has a PTAL rating of 6a (Excellent) and it is expected many visitors will continue to either walk, cycle, or catch public transport to the site. The site would be able to accommodate the increase in demand onsite as demonstrated within the submitted Transport Assessment and Travel Plan.
- 16.5 TfL have not objected to the scheme on the grounds of additional impact and note that the site may require active stewarding and potentially even crowd controls during peak periods. An Operational Management Plan would be secured via a section 106 obligation.
- 16.6 Travel Plans are an effective tool for managing visitors, volunteers, and employees at a site by helping to promote sustainable transport and enhancing the effectiveness of sustainable transport facilities at the site. The applicant has submitted a Travel Plan, however the Travel Plan cannot be finalised until planning permission is granted and a permanent Travel Plan Co-ordinator can be assigned.
- 16.7 If planning permission is granted a final Travel Plan would be secured as a section 106 planning obligation.
- 16.8 The Council would also seek to secure a financial contribution of £6,020 to cover the costs of monitoring and reviewing the travel plan over a 5 year period. This would also need to be secured by a Section 106 planning obligation if planning permission is granted.

Car parking

- 16.9 There are currently no car parking spaces on the site, and none are proposed. A car-free proposal is supported by officers and shall be secured by S106 agreement.

Cycle parking

- 16.10 There are currently no formal cycle parking spaces on site. Under the proposal, a total of 26 short stay cycle parking spaces are proposed next to the wheel and entrance to the market from the canal path. No long stay cycle parking is proposed.
- 16.11 Due to the site only proposing an uplift of 54sqm it doesn't require any cycle parking, but they are providing short stay because they recognise there will be increased demand. An informative stating that an assessment of long-stay cycle parking should be included in any future application for the wider area. Council's Transport Officer is satisfied with this approach.

Management of construction impacts

- 16.12 This development would require a significant amount of construction works. This would generate a large number of construction vehicle movements during the overall construction period with the temporary observation wheel requiring sixteen Heavy Good Vehicle (HGV) to deliver the prefabricated parts to the site. Officers' primary concern is public safety, but the Council also needs to ensure that construction traffic does not create (or add to existing) traffic congestion. The proposal could result in amenity issues for local people in terms of noise, vibration and air quality.

- 16.13 The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. Officers are concerned especially about the impact on vulnerable road users during peak time.
- 16.14 Delivery of the temporary observation wheel to the site will need to reverse in off Camden High Street onto Camden Lock Place. All other construction traffic is proposed to enter in forward gear and turn within the site. As such, a Stage 1 Road Safety Audit (RSA) prior to commencement for the proposed reverse-in manoeuvre will be required. A Construction Management Plan and a Delivery and Servicing Management Plan should therefore be secured as a Section 106 planning obligation if planning permission is granted.
- 16.15 To minimise the impact on the existing road network, it is requested that no HGV movements be allowed at peak times; "Heavy Good Vehicle movements should be optimised to avoid the AM and PM peak hours".
- 16.16 For this reason, a Construction Management Plan (CMP) should therefore be secured as a Section 106 planning obligation, with the additional obligation that freight movement should be limited between 9:30am to 4:30 Monday the Friday and 8am till 1pm Saturdays, with no deliveries on Sunday and bank holidays unless agreed beforehand with Camden Council.

Pedestrian, Cycling, and Environmental Improvements and Highways

- 16.17 The impact the additional trips would have on the public highway in the general vicinity of the site (Camden High Street, Chalk Farm Road, and Castlehaven Road and Hawley Road) are considered to be significant. The Council therefore would seek to secure a pedestrian, cycling, and environmental improvements contribution of £500,000, if planning permission is granted. This would be one of the Section 106 heads of terms. The funding would be utilised as follows:
- Contribution towards a planned scheme to introduce segregated cycle facilities, public realm and other Healthy Streets improvements on Chalk Farm Road in the vicinity of the site. This is the 20th highest "link" priority in the latest Borough-wide Road Safety Audit analysis, which prioritises each section of road based on their relative road safety casualty history and risk. The scheme would also include safety improvements for cycling and walking at the junctions of Camden High Street, Chalk Farm Road, and Castlehaven Road. This is one of the main entrance points to the site.
 - Contribution towards a planned scheme to introduce public realm improvements including pedestrianisation and other Healthy Streets improvements on Camden High Street between Parkway and Hawley Crescent in the vicinity of the site.
 - Contribution towards a planned scheme to introduce two-way cycling on Castlehaven Road and Hawley Road which would form part of a Cross-Camden Cycleway.
- 16.18 The improvements would make it easier and safer for cyclists and pedestrians to travel to and from the site, with the junction scheme also ensuring that north/south and east/west cycle journeys are safely facilitated alongside the recently installed cycle lanes on Chalk Farm Road. The Camden High Street and Chalk Farm Road schemes also feature as either "high" or "very high" on our hexcell mapping of priority locations in the Borough for transport projects, based on a combination of indicators including air quality, road safety, walking and cycling potential. Additionally, the Chalk Farm Road corridor itself is one of the busiest in London in terms of cycle journeys, requiring high quality, safe, protected cycle lanes alongside wider Healthy Streets improvements.
- 16.19 £11,301.14 is required to mitigate the impact from Highways works and would be secured via Section 106.

Conclusions

16.20 The proposals are acceptable in transport terms subject to section 106 obligations and conditions.

17 Security and fire safety

17.1 Camden Local Plan policy C5 and CPG1 (Design) are relevant with regards to secure by design.

17.2 The proposal features the following security measures:

- security lighting
- CCTV
- natural surveillance
- active frontages
- increased permeability

17.3 The proposal improves visual and physical permeability. Officers consider that the proposed security measures will discourage crime and fear of crime. Given the proposed security measures and that no objections have been received from the Designing Out Crime officer, the proposal is considered acceptable in terms of the principles of Secure by Design. Conditions are attached regarding CCTV and lighting.

17.4 The Operational Management Plan, secured via section 106, would detail safety measures with regards the observation wheel and crowd control.

17.5 A Fire Statement has been submitted as part of the application. A condition is attached to ensure compliance with the measures set out within this statement.

18 Refuse and recycling

18.1 Policy CC5 and Camden Planning Guidance 'Design' are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.

18.2 A waste room, roughly 489sqm, is proposed within the West Yard in the lower ground floor of the existing East Vaults building. An existing waste room is currently located within the East Vaults building, however due to the nature of the proposal, the waste room has been reduced in size to accommodate the proposed flexible F1/E space.

18.3 The applicant has partnered with iRecycle to enable the new facilities to service waste from the markets efficiently, including Stables Market and Buck Street Market. Waste from any refuse bins located around the market would be collected by the on-site facilities management team and transferred to the waste store.

18.4 The proposed changes to the market as a result of the proposal is likely to create an increase in the amount of waste generated with an estimated increase by up to 30%. To combat the increased waste generation, an on-site in-bin compactor for the general and MDR waste, a glass crusher for glass waste and a dryer for the food waste will be used. The use of the barge for waste movement is an important part of Camden Market's sustainability commitments. Road collection can also be difficult to manage due to space constraints and congestion, so the barge reduces this pressure. A Waste Management Strategy would be secured via section 106.

19 Employment and training opportunities

- 19.1 The proposed development is large enough to generate significant local economic benefits. Policies E1 and E3 seek to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services.
- 19.2 In line with CPG8, a range of training and employment benefits are to be secured in order to provide opportunities during and after the construction phase for local residents and businesses. This package of recruitment, apprenticeship and procurement measures will be secured via shadow S106 / condition and will comprise:
- Local employment
 - Construction apprenticeships and work placement opportunities through the King's Cross Construction Skills Centre
 - Local Procurement
 - Community based enterprise initiatives
 - Work apprenticeships
 - To promote job vacancies to local residents.

Construction phase

- 19.3 Apprenticeships - as the build cost for this scheme will exceed £3 million the applicant must recruit 1 construction apprentice paid at least London Living Wage per £3million of build costs and pay the council a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre.
- 19.4 Construction Work Experience Placements - The applicant should provide construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre, as per section 69 of the Employment sites and business premises CPG.
- 19.5 Local Recruitment – Council's standard local recruitment target is 20%. The applicant should work with the Kings Cross Construction Skills Centre to recruit to vacancies, advertising with us for no less than a week before the roles are advertised more widely.
- 19.6 Local Procurement – The applicant must also sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business premises CPG. Our local procurement code sets a target of 10% of the total value of the construction contract.
- 19.7 This package of employment and training, and supporting contributions, will be secured under the section 106 agreement and so the proposals are therefore in accordance with the above policies.

20 Planning obligations

- 20.1 The following contributions are required to mitigate the impact of the development upon the local area, including on local services. These heads of terms will mitigate any impact of the proposal on the infrastructure of the area.

Contribution	Amount (£)
Highways	11,301.14
Pedestrian, cycling and environmental	500,000
Travel plan monitoring	6,020
Contribution towards cleaning canal (Litter Management Strategy)	8,500 per annum for 9 years (76,500)
Cycle Hire operations (TfL)	100,000
Carbon off-setting charge	89,100
CMP support fee	9,927.46
CMP bond	15,000
TOTAL	807,848.60

21 Mayor of London's Crossrail CIL

- 21.1 The proposal is not liable for the Mayor of London's Community Infrastructure Levy (CIL) as it includes an uplift less than 100sqm floorspace (54sqm GIA).

22 Camden CIL

- 22.1 The proposal is not liable for the Camden Community Infrastructure Levy (CIL) as it includes an uplift less than 100sqm floorspace (54sqm GIA).

23 CONCLUSION

- 23.1 The proposals would provide access into East Vaults and Dead Dog Basin for the first time whilst delivering a viable and attractive land use for the community and commercial activity.
- 23.2 The proposed temporary observation wheel will create a new attraction to the Camden Lock Market and increase foot traffic to the site which will only benefit the market traders and the Camden Town Centre.
- 23.3 The proposals are considered to be a sensitive approach to upgrading the market for the 21st century with a high-quality, contemporary design that would cause some less than substantial harm to the setting of some listed buildings, and the Regent's Canal and Harmood Street Conservation Areas. The harm has been mitigated, would be temporary, and the scheme would also provide some heritage benefits.
- 23.4 The proposals will not materially impact on residential amenity, given that there are no residential properties adjoining the site, with the nearest residential being over 50m away at an oblique angle across the canal and with conditions and section 106 heads of terms mitigating any potential impact.
- 23.5 The proposal is car free and would substantially improve upon the existing situation with regards to cycle parking.
- 23.6 Given the benefits from the proposed land use mix, the quality of the architecture proposed and the section 106 contributions, on balance, it is considered that the application is acceptable with public benefits of the scheme, including a viable use for the vaults and basin in the listed Interchange Building, capable of outweighing the considerable weight and importance given to the identified harm.
- 23.7 The development would be appropriate and in accordance with relevant National and Regional Guidance, Core Strategy and Development policies and Camden Planning Guidance for the reasons noted above.

24 RECOMMENDATIONS

24.1 Planning Permission is recommended subject to conditions and a S106 Legal Agreement covering the following Heads of Terms:

- Removal and restoration plan – secure removal of the observation wheel, footbridge over basin, and associated decking on or before the end of a 5 year period and reinstatement and restoration of the land.
- Operational Management Plan
- Local Schools and Families Plan
- Cultural Plan
- Litter and Management Strategy and contribution of £8,500 per annum for 9 years to ensure the Canal is maintained.
- Reinstatement Strategy
- Carbon off-setting charge (£89,100)
- Energy and Sustainability Strategy
- Car free development
- Travel Plan and financial contribution of £6,020 to cover the costs of monitoring and measuring the Travel Plans for a period of 5 years.
- Construction Management Plan, including waste management strategy.
- Delivery and Servicing Management Plan (DSMP).
- £500,000 towards Pedestrian, Cycling, Environmental, and Public Realm improvements in the vicinity of the site.
- £11,301.14 towards highways works.
- £100,000 for TfL Cycle Hire

Employment and training

With regards to construction:

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs as per clause 8.28 of CPG8.
- If the build costs of the scheme exceed £3 million the applicant must recruit 1 construction apprentice per £3million of build costs, and pay the council a support fee of £1,700 per apprentice as per clause 8.17 of CPG8. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre.
- The applicant should provide a specified number (to be agreed) of construction related work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre.
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- If the value of the scheme exceeds £1 million, the applicant must also sign up to the Camden Local Procurement Code, as per section 8.19 of CPG8. This should include at least 2 Meet the Buyer events/local supplier workshops to promote opportunities for local businesses.

With regard to the end use:

- To develop a package of measures to support the development of enterprise locally. The range of measures to include support for a community based enterprise initiatives, such as, Into Enterprise, Haverstock School Enterprise Projects, support

and guidance for smaller markets. Measures to also include supporting local residents and makers to embark on start ups and providing advice, guidance and mentoring scheme.

- A rolling programme of 2 apprenticeships a year according CPG8 clause 8.33 to be recruited through the Council's Economic Development Team. The apprenticeships could relate to either Market Retail Apprentice, Business Admin, Customer Service
- To promote job vacancies to local residents through the Council's Economic Development Team
- The applicant provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements prior to occupation.

25 LEGAL COMMENTS

25.1 Members are referred to the note from the Legal Division at the start of the Agenda.

26 CONDITIONS

26.1 Planning application

1	<p>Three years from the date of this permission</p> <p>This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>Drawings:</p> <p>Planning Permission Existing and Proposed Plans prepared by Piercy & Company, project No. 13663, drawing No. 010, Rev A; drawing No. 001, Rev C; drawing No. 100, Rev C; Series P01, drawing No. 100, Rev C; drawing No. 101, Rev C; drawing No. 102, Rev C; drawing No. 103, Rev C; drawing No. 200, Rev C; drawing No. 201, Rev C; drawing No. 202, Rev C; drawing No. 300, Rev C, all dated 30.08.2022.</p> <p>Supporting Documents:</p> <p>Design and Access Statement (Piercy & Company) dated August 2022 Town Planning Statement (Gerald Eve) dated August 2022 Heritage, Townscape and Visual Impact Assessment (Turley) dated August 2022 Daylight and Sunlight Report (GIA) dated 04/07/2022 Cultural Plan (LabTech) dated August 2022 Air Quality Assessment (Waterman Group) dated August 2022 Accessibility Assessment (ARUP) dated 26 August 2022 Archaeological Desk Based Assessment (MOLA) dated 15/08/22 Circular Economy Statement (ARUP) dated 23 August 2022 Energy Statement (GDM) dated 26-08-2022</p>

	<p>Fire Strategy Statement (Jensen Hughes) dated 27 July 2022 Geotechnical Interpretative Report (CGL) dated August 2022 Life Cycle Carbon Assessment for Wheel (ARUP) 23 August 2022 Retail Statement (LabTech) dated August 2022 Preliminary Ecological Appraisal (Waterman Group) dated August 2022 Pre-Demolition Audit Report (ARUP) dated 9 August 2022 Operational Management Plan (Jolita Galkauskaite) dated August 2022 Planning Compliance Report (KP Acoustics) dated 12 August 2022 Servicing Management Plan (ARUP) dated 23 August 2022 Structural Report (Walsh) dated 31 May 2022 Sustainability Statement (ARUP) dated 23 August 2022 Whole Life Carbon Assessment for Refurbishment Works (ARUP) dated 23 August 2022 Transport Assessment & Interim Travel Plan (ARUP) dated August 2022 Reinstatement Strategy (Piercy & Company) dated August 2022 Townscape Visual Impact Assessment (Turley) dated August 2022, Daylight, Sunlight and Privacy VL 2801 (GIA) 26/05/23.</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>The observation wheel and associated pedestrian footbridge over the canal within the West Yard are hereby permitted for a temporary period only and shall be removed and the land, including all canal structures and fixings, reinstated in accordance with a scheme of remediation to be submitted to and approved in writing by the LPA, on or before five (5) years from the date of this permission.</p> <p>Reason: The type of structure is not such as the local planning authority is prepared to approve, other than for a limited period, in view of its appearance. The permanent retention of the structure would be contrary to the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
4	<p>Before the relevant part of the work is begun, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:</p> <p>a) Details of the engineering and construction methodology for the erection of the observation wheel, and any structural works to the canal inlet to support it and the footbridge.</p> <p>b) Plan, elevation and section drawings, including fascia, cornice, pilasters, doors, windows, glazing panels, and new shopfronts, at a scale of 1:10;</p> <p>c) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site).</p> <p>The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
5	<p>All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application.</p>

	Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.
6	<p>No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the buildings.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
7	<p>Before any brickwork is commenced, a sample panel of the facing brickwork demonstrating the proposed colour, texture, face-bond and pointing shall be provided on site and approved in writing by the local planning authority. The development shall be carried out in accordance with the approval given. The approved panel shall be retained on site until the work has been completed.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with policy D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
8	<p>Prior to the operation of the uses hereby approved, full details of a landscaping scheme (to include information on interpretation, surface materials, boundary treatments, the type, location and proposed root protection of new vegetation and planting including one tree) shall be submitted to and agreed in writing by the Local Planning Authority. Thereafter the development should be carried out fully in accordance with the approved details.</p> <p>Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A2, A3, D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
9	<p>Details shall be submitted to and approved by the local planning authority, regarding the retention and reuse of the historic granite setts. All works will be thereon be implemented in accordance with these details.</p> <p>Reason: To preserve the fabric of the site and its historical significance within the Regent's Canal Conservation Area in accordance with Policy D2 of the Camden Local Plan 2017.</p>
10	<p>No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and</p> <p>A. The programme and methodology of site investigation and recording and nomination of a competent person(s) or organisation to undertake the agreed works B. Where appropriate, details of programme for delivering related positive public benefits C. The programme for post-investigation assessment and subsequent analysis, publication and dissemination and deposition of resulting material.</p>

	<p>This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.</p> <p>Reason: To ensure the site is safe in accordance with Camden Local Plan policy A1.</p>
11	<p>The external noise level emitted from plant, machinery or equipment at the development with specified noise mitigation hereby approved shall be lower than the typical existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity and thereafter be permanently retained.</p> <p>Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
12	<p>Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.</p> <p>Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017</p>
13	<p>Prior to the operation of the observation wheel, the following bicycle parking shall be provided in accordance with the approved plans:</p> <ul style="list-style-type: none"> - Twenty-Six (26) short-term spaces <p>All such facilities shall thereafter be permanently maintained and retained.</p> <p>Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with Camden Local Plan policies T1 and T2, the London Plan and CPG Transport.</p>
14	<p>Prior to the occupation of the of the proposed development, the refuse and recycling storage areas shall be completed and made available for traders/occupants of the Camden Lock Market.</p> <p>As such, the development shall not be implemented other than in accordance with such measures as approved and shall be retained thereafter.</p> <p>Reason: To safeguard the amenities of the future occupiers and adjoining neighbours in accordance with the requirements of Camden Local Plan policy CC5.</p>
15	<p>A Lighting Strategy, with regards to bats and biodiversity impact, shall be submitted to and approved by the Council prior to occupation. Lighting on the premises shall be operated accordingly permanently thereafter.</p> <p>Reason: To ensure an environment which conserves and enhances wildlife habitats and biodiversity measures within the development, in accordance with the requirements of the London Plan and Policies A3 and CC2 of the London Borough of Camden Local Plan 2017.</p>
16	<p>No amplified noise shall be audible outside the capsules of the wheel.</p>

	Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.
17	<p>Following the completion of any remediation, a verification report demonstrating that the remediation as outlined in the RMS have been completed should be submitted to, and approved in writing, by the local planning authority. This report shall include (but may not be limited to): details of the remediation works carried out; results of any verification sampling, testing or monitoring including the analysis of any imported soil and waste management documentation. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p> <p>Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.</p>
18	<p>Prior to the commencement of any works on site, details demonstrating how trees to be retained shall be protected during construction work shall be submitted to and approved by the local planning authority in writing. Such details shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction". All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained, and protected from damage in accordance with the approved protection details.</p> <p>Reason: To ensure that the development will not have an adverse effect on existing trees and in order to maintain the character and amenity of the area in accordance with the requirements of policies A2 and A3 of the London Borough of Camden Local Plan 2017.</p>
19	<p>Within 3 months of operation, a post construction monitoring report should be completed in line with the GLA's Circular Economy Statement Guidance. The post-construction monitoring report shall be submitted to the GLA, currently via email at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to operation of the development.</p> <p>Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials. In accordance with policies CC1 and CC5 of the Camden Local Plan 2017.</p>
20	<p>The development must be carried out in accordance with the provisions of the Fire Statement prepared by Jensen Hughes dated 27 July 2022 unless otherwise approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with the Mayor's London Plan Policy D12.</p>
21	<p>Prior to commencement of any impact piling, a piling method statement shall be submitted to and approved in writing by the local planning authority. The Method Statement shall be prepared in consultation with Thames Water or the relevant statutory undertaker and shall detail the depth and type of piling to be undertaken and the methodology by which such piling will be carried out including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works. Any piling must be undertaken in accordance with the terms of the approved piling method statement.</p>

	Reason: To safeguard existing below ground public utility infrastructure and controlled waters in accordance with the requirements of Policy CC3 of the London Borough of Camden Local Plan 2017.
22	<p>No development shall commence until a remediation method statement (RMS) is submitted to and approved in writing by the local planning authority. This statement shall detail any required remediation works and shall be designed to mitigate any remaining risks identified in the approved quantitative risk assessment. This document should include a strategy for dealing with previously undiscovered contamination. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p> <p>Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.</p>
23	<p>Prior to the commencement of any demolition works on site, a feasibility study shall be carried out to assess the potential for moving freight by water during the construction cycle (waste and bulk materials) and following occupation of the development (waste and recyclables). The use of waterborne transport shall be maximised during the construction of the development unless the above assessment demonstrates that such use of the waterways is not physically or economically feasible.</p> <p>Reason: To encourage the use of the waterways for transporting waste and bulk materials in accordance with policies SI 14, SI 15, SI 16, SI 17, T4, and T7 of the London Plan 2021.</p>
24	<p>No development shall commence until a site investigation is undertaken and the findings are submitted to and approved in writing by the local planning authority.</p> <p>The site investigation should assess all potential risks identified by the desktop study and should include a generic quantitative risk assessment and a revised conceptual site model. The assessment must encompass an assessment of risks posed by radon and by ground gas. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p> <p>Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.</p>
25	<p>Prior to the commencement of the development hereby permitted, a Risk Assessment and Method Statement outlining all works to be carried out adjacent to, in, over or under the water must be submitted to and approved in writing by the Local Planning Authority, and implemented as agreed.</p> <p>Reason: To ensure that the works have no adverse impact on canal or towpath users or the waterspace in accordance with Policy A1 of the Camden Local Plan 2017.</p>
26	No development shall commence until a preliminary risk assessment report is submitted to and approved in writing by the local planning authority. This report shall comprise: a desktop study which identifies all current and previous uses at the site and surrounding area as well

	<p>as the potential contaminants associated with those uses. A conceptual site model should be produced indicating potential pollutant linkages between sources, pathways and receptors, including those in the surrounding area and those planned at the site; and a qualitative risk assessment of any potentially unacceptable risks to identified receptors. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p> <p>Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.</p>
27	<p>Prior to occupation, full details of any proposed CCTV scheme shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Canal & River Trust. The approved lighting and CCTV scheme should be implemented prior to first occupation of the development.</p> <p>Reason: In the interest of crime prevention, ecology, visual amenity and the waterway setting in accordance with policy C5 of the Camden Local Plan.</p>

26.2 Listed building consent

1	<p>The works hereby permitted shall be begun not later than the end of three years from the date of this consent.</p> <p>Reason: In order to comply with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p>
2	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>Drawings:</p> <p>Existing & Proposed Plans prepared by Piercy & Company, project No. 13663, drawing No. 100, Rev C; drawing No. 101, Rev C; drawing No. 200, Rev C; drawing No. 201, Rev C; drawing No. 202, Rev C; drawing No. 300, Rev C; drawing No. 301, Rev C; drawing No. 302, Rev C; drawing No. 303, Rev C; drawing No. 304, Rev C; drawing No. 310, Rev B; drawing No. 330, Rev A, all dated 30.08.2022.</p> <p>Supporting Documents:</p> <p>Design and Access Statement (Piercy & Company) dated August 2022 Town Planning Statement (Gerald Eve) dated August 2022 Heritage, Townscape and Visual Impact Assessment (Turley) dated August 2022 Daylight and Sunlight Report (GIA) dated 04/07/2022 Cultural Plan (LabTech) dated August 2022 Air Quality Assessment (Waterman Group) dated August 2022 Accessibility Assessment (ARUP) dated 26 August 2022 Archaeological Desk Based Assessment (MOLA) dated 15/08/22 Circular Economy Statement (ARUP) dated 23 August 2022 Energy Statement (GDM) dated 26-08-2022</p>

	<p> Fire Strategy Statement (Jensen Hughes) dated 27 July 2022 Geotechnical Interpretative Report (CGL) dated August 2022 Life Cycle Carbon Assessment for Wheel (ARUP) 23 August 2022 Retail Statement (LabTech) dated August 2022 Preliminary Ecological Appraisal (Waterman Group) dated August 2022 Pre-Demolition Audit Report (ARUP) dated 9 August 2022 Operational Management Plan (Jolita Galkauskaite) dated August 2022 Planning Compliance Report (KP Acoustics) dated 12 August 2022 Servicing Management Plan (ARUP) dated 23 August 2022 Structural Report (Walsh) dated 31 May 2022 Sustainability Statement (ARUP) dated 23 August 2022 Whole Life Carbon Assessment for Refurbishment Works (ARUP) dated 23 August 2022 Transport Assessment & Interim Travel Plan (ARUP) dated August 2022 Reinstatement Strategy (Piercy & Company) dated August 2022 Townscape Visual Impact Assessment (Turley) dated August 2022 </p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>All new work and work of making good shall be carried out to match the existing adjacent work as closely as possible in materials and detailed execution.</p> <p>Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.</p>
4	<p>No works shall commence until full details of all materials and finishes for works to the listed building have been submitted to the Local Planning Authority for approval. All works shall thereafter be carried out in accordance with the approved details.</p> <p>Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.</p>

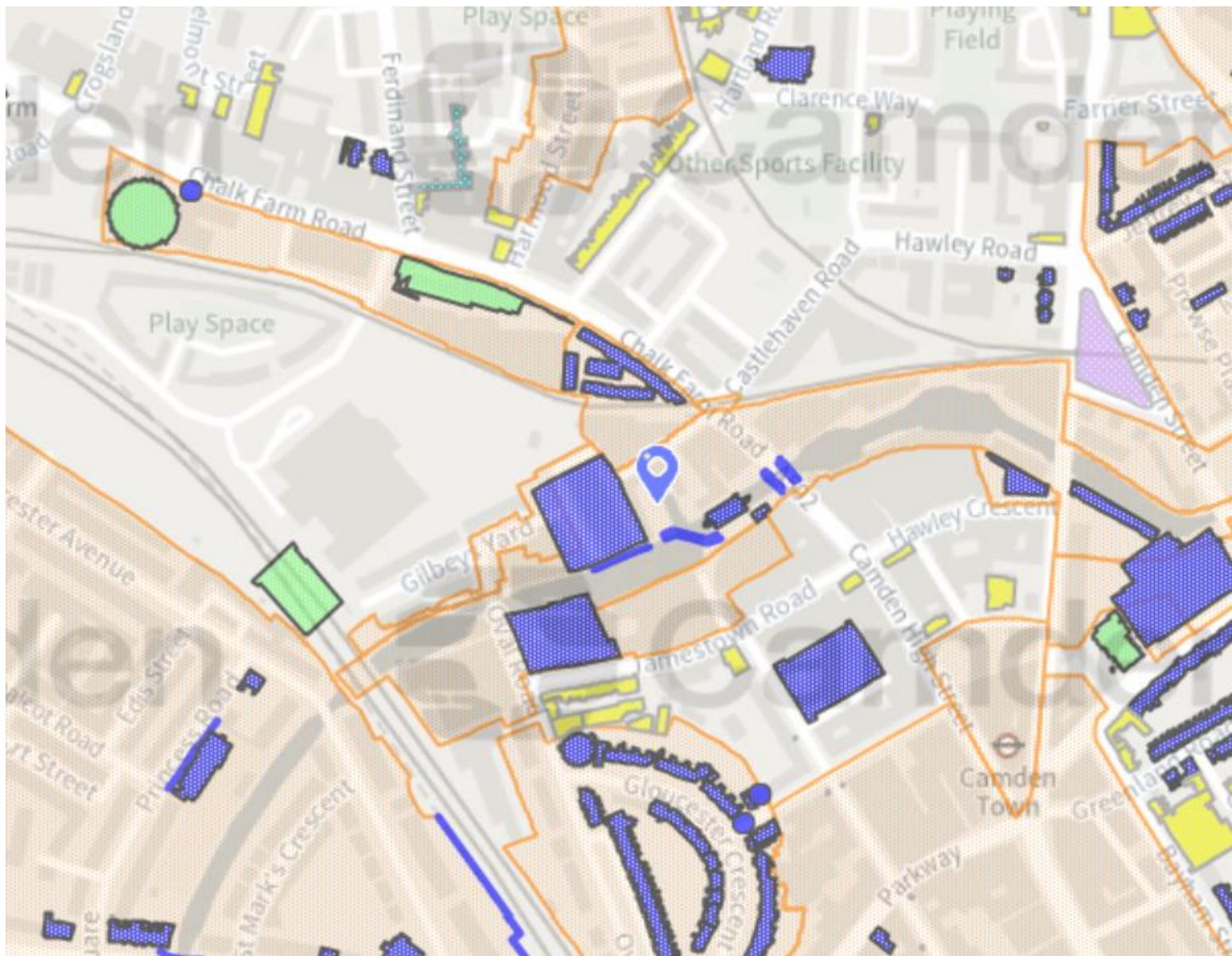
27 INFORMATIVES

1	<p>GLAAS informative:</p> <p>Written schemes of investigation will need to be prepared and implemented by a suitably qualified archaeological practice in accordance with Historic England Greater London Archaeology guidelines. They must be approved by the planning authority before any on-site development related activity occurs.</p>
2	<p>National Grid informative:</p> <p>You are advised to continue discussions with National Grid regarding underground servicing.</p>
3	<p>Thames Water informative 1:</p> <p>The London plan Policy 5.13 identifies a hierarchy of drainage options for surface water drainage and as such we would expect the development proposal to follow this. Policy 5.13: The Mayor will, and boroughs should, seek to ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy: >Store rainwater for later use >Use infiltration techniques, such as porous surfaces in non-clay areas >Attenuate rainwater in ponds or open water features for gradual release to a watercourse >Attenuate rainwater by storing in tanks or sealed water features for gradual release to a watercourse >Discharge rainwater direct to a watercourse >Discharge rainwater to a surface water drain >Discharge rainwater to the combined sewer. The use of sustainable urban drainage systems should be promoted for development unless there are practical reasons for not doing so. Such reasons may include the local ground conditions or density of development. In such cases, the developer should seek to manage as much run-off as possible on site and explore sustainable methods of managing the remainder as close as possible to the site. The Mayor will encourage multi agency collaboration (GLA Group, Environment Agency, Thames Water) to identify sustainable solutions to strategic surface water and combined sewer drainage flooding/overflows. Developers should aim to achieve greenfield run off from their site through incorporating rainwater harvesting and sustainable drainage. Boroughs should encourage the retention of soft landscaping in front gardens and other means of reducing or at least not increasing the amount of hard standing associated with existing homes. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 0203 577 9998) prior to the Planning Application approval.</p>
4	<p>Thames Water informative 2:</p> <p>Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses.</p>
5	<p>Thames Water informative 3:</p>

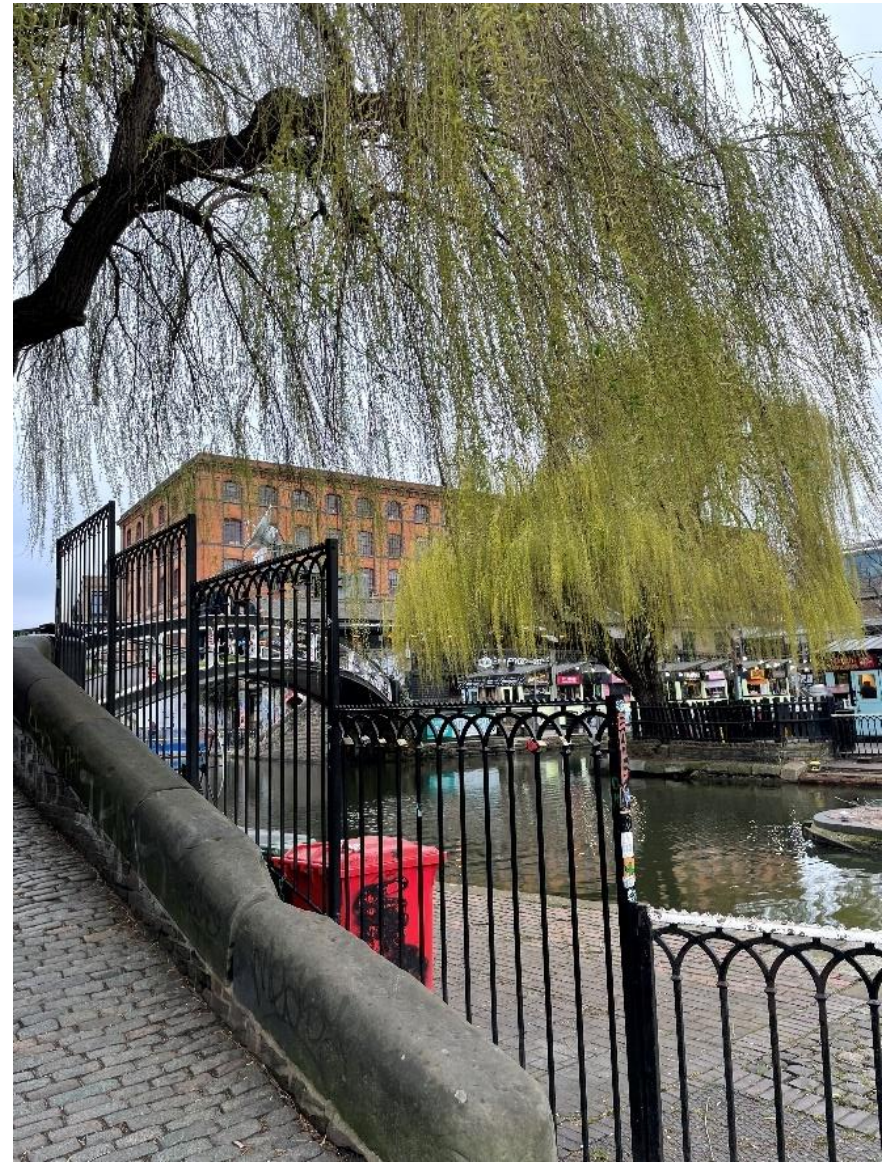
	Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.
6	<p>Thames Water informative 4:</p> <p>We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.</p>
7	<p>Thames Water informative 5:</p> <p>Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p>
8	<p>Thames Water informative 6:</p> <p>As the site falls within the highly flood sensitive Counters Creek Catchment we expect surface water attenuation to Greenfield run-off rates. We would expect a site drainage strategy that outlines the current and proposed discharge points into the public sewer system as well as current and proposed peak discharge rates.</p>







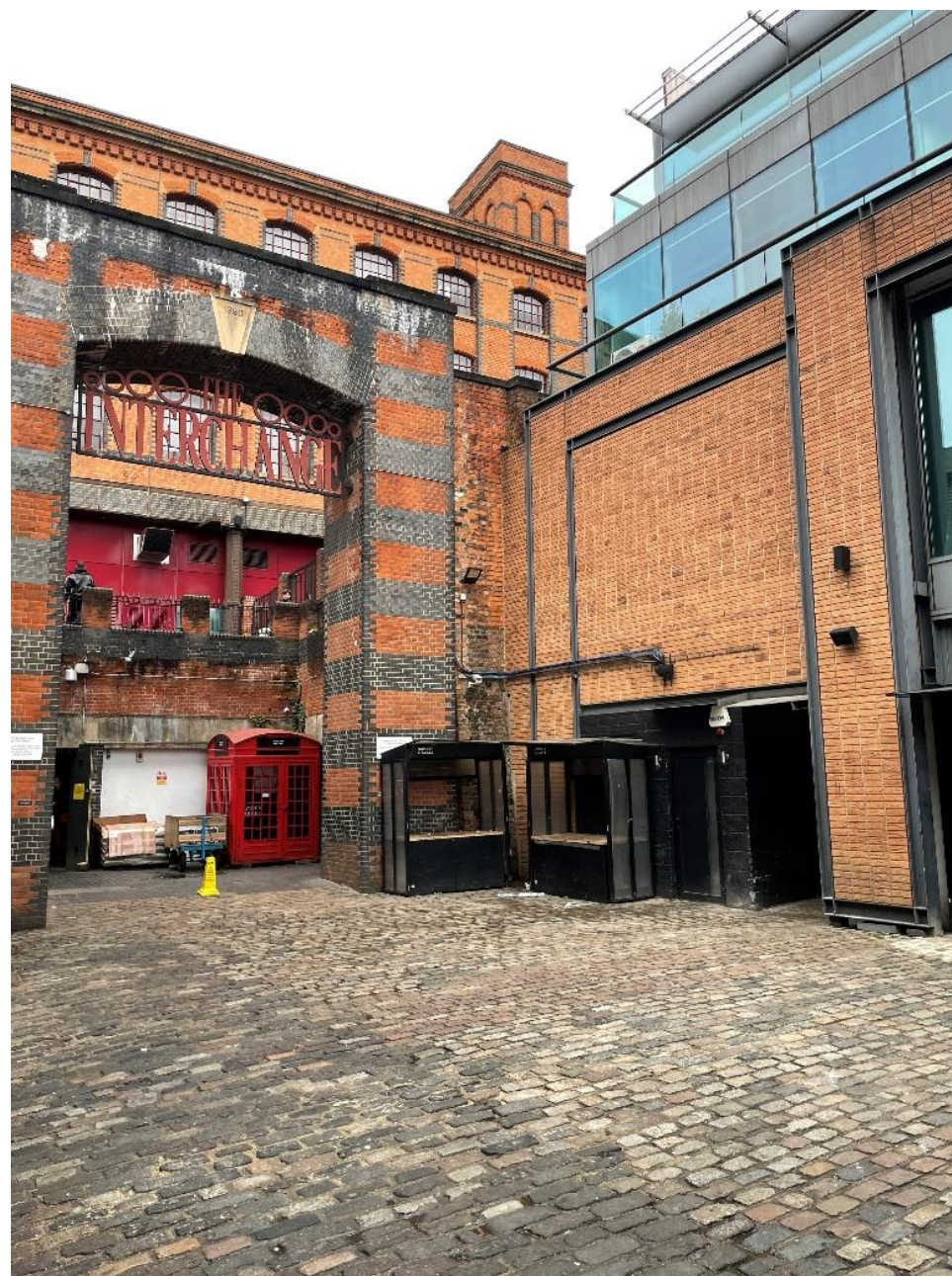




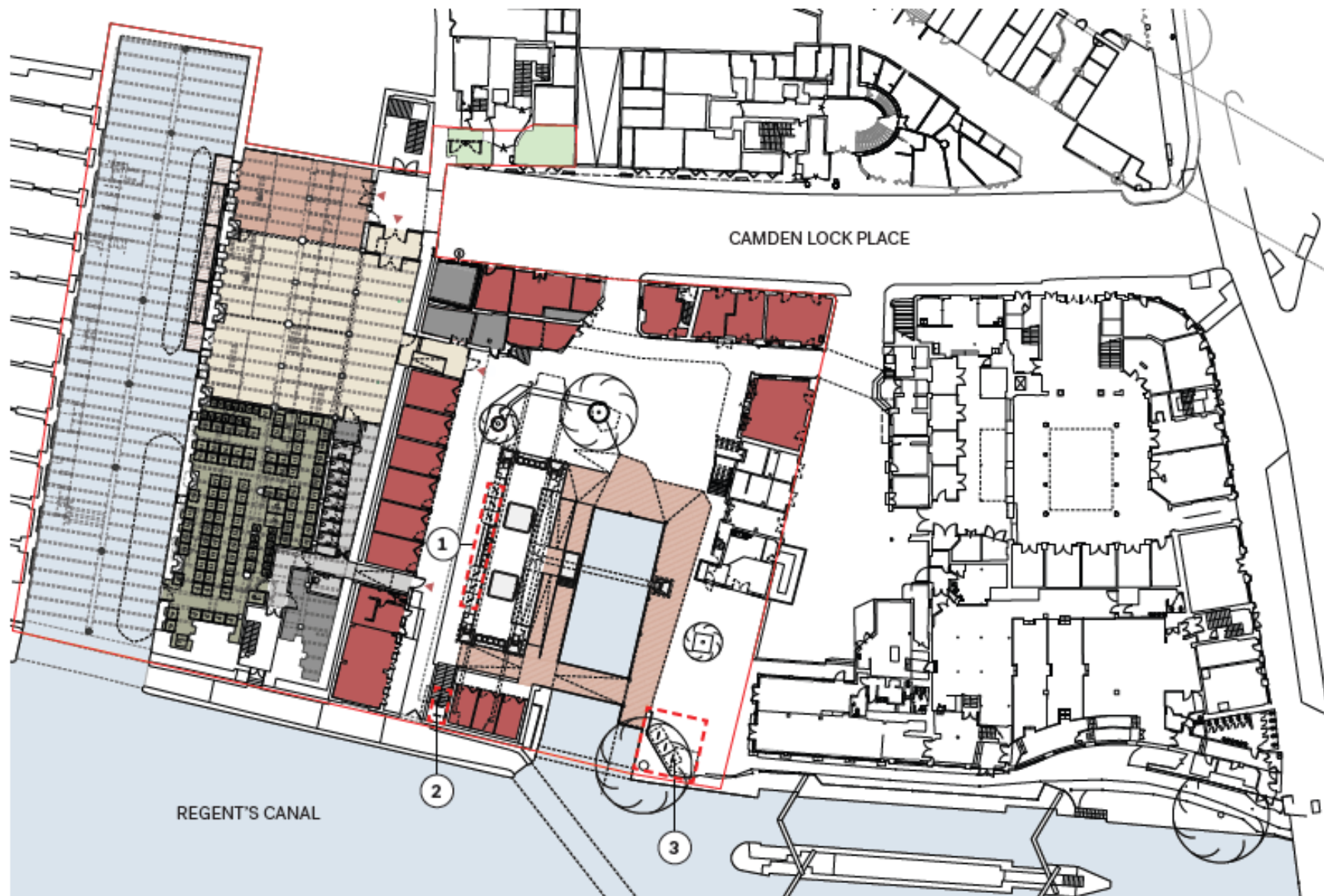




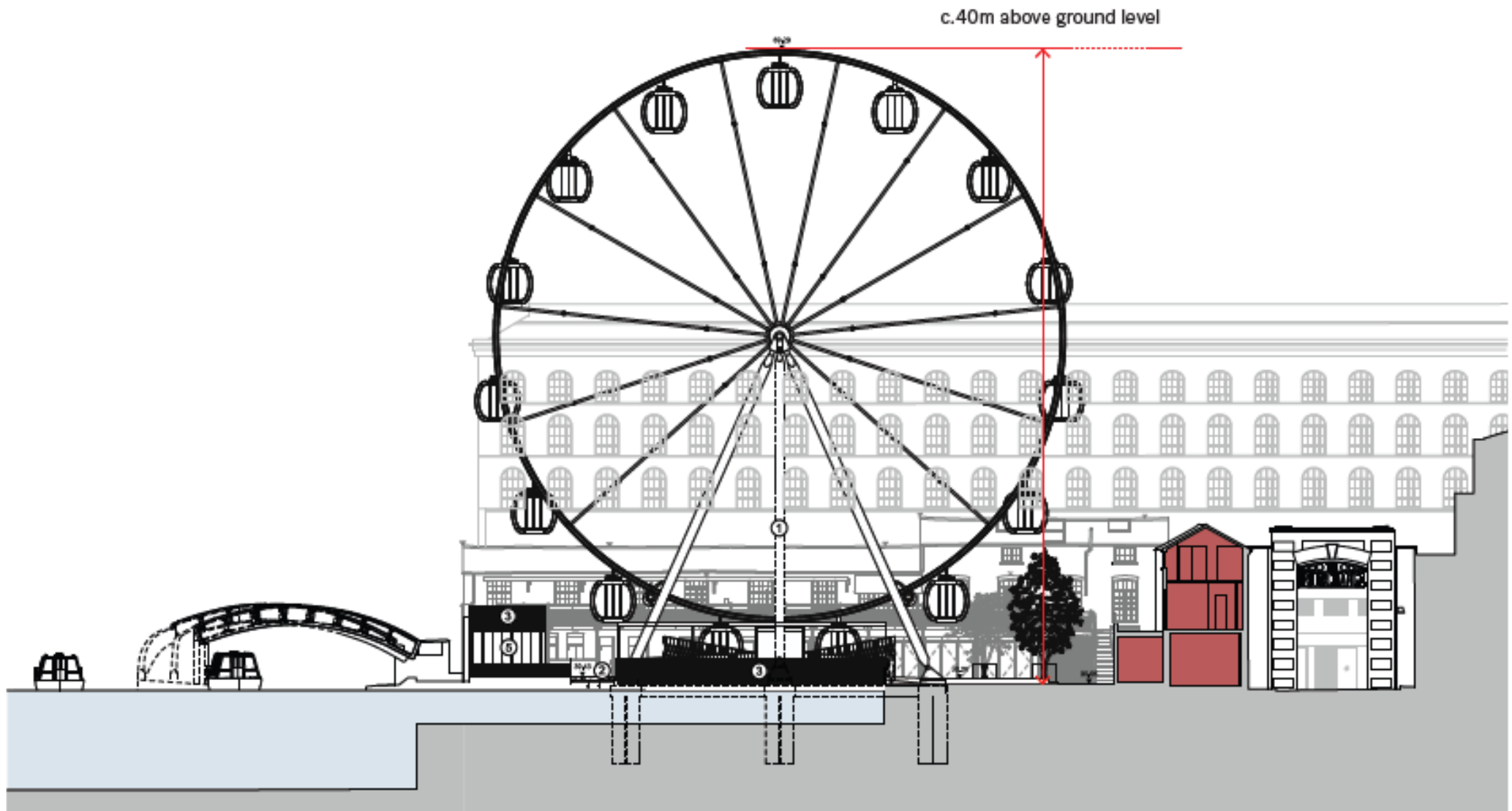












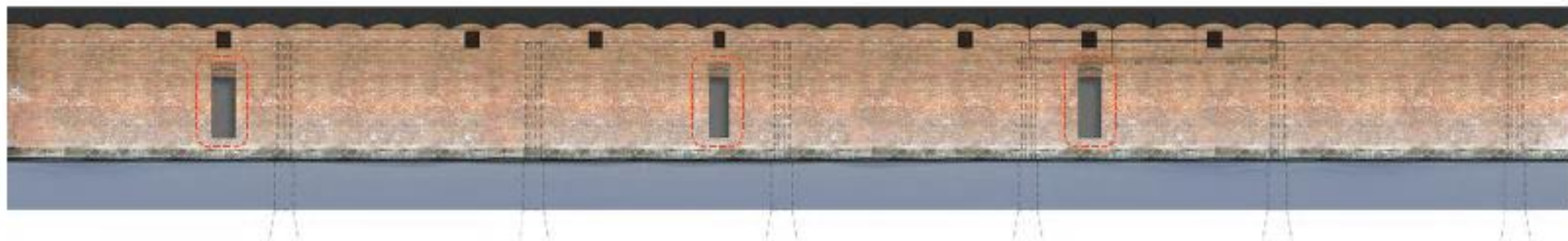








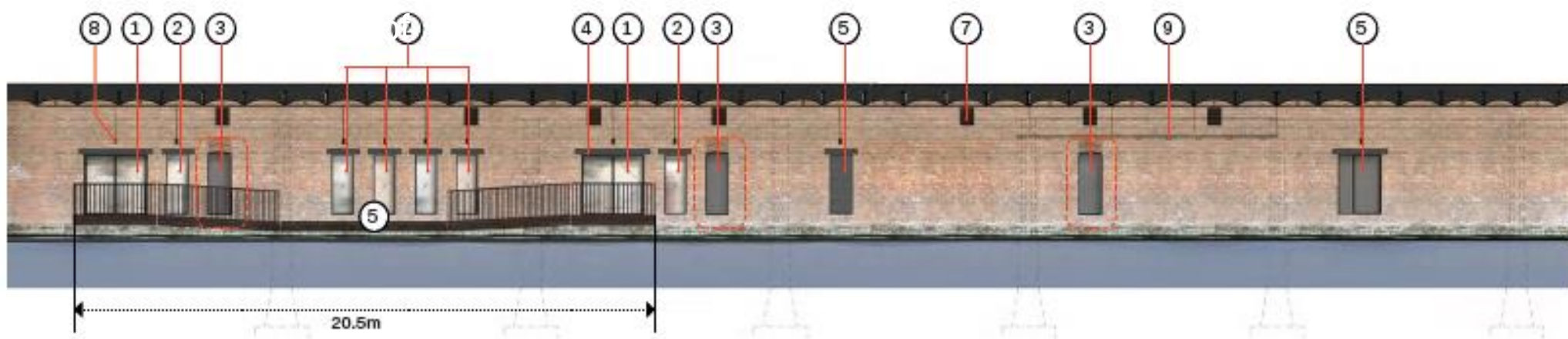




(A) Existing elevation of the east wall between Dead Dog Basin and East Vaults

Key:

 Existing openings



B Proposed elevation of the east wall between Dead Dog Basin and East Vaults showing the proposed openings and extent of the jetty