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BY EMAIL TO simon.greenwood@islington.gov.uk

Dear Mr Greenwood

## Regent's Wharf 10,12,14,16 and 18 All Saints Street, London N1 Amended Objection to Planning Application No. P2016/4805/FUL

We have studied the amendments of some aspects of the design as viewed from the canal, but the Greater London Industrial Archaeology Society (GLIAS) continues to object to the proposals for this site, as they will continue to harm the character of the conservation area. The main points of our objection remain. We have adjusted our comments as below and have taken the opportunity to refine one or two points.

1) The former Thorley's Cattle Food Mill buildings are distinctive and relatively unaltered industrial buildings which, from their form and central position set the tone of the Regent's Canal West Conservation Area – they are its star feature as seen from the canal towpath. This much-loved CA retains a special character and composure from the way that 19th- and early-20th-century industrial buildings have been retained and the way in which the recent buildings are relatively sympathetic in scale and massing and the colours of their materials. This is a tribute to the Council's former conservation officers, namely Geoffrey Gribble, who was responsible for setting up the CA and the local listing programme, and Alec Forshaw and Mike Bruce, who helped steer the course of development.

2) The locally listed buildings as they currently stand are instructive in illustrating some of the industrial past of the Regent's Canal and moreover the component elements, forms and scale of an 1890s milling complex. Additional and enlarged windows were introduced in the office conversion completed in 1991, but comfortably fitted in to the original facades, while the defining forms of the eaves, roofs and dormers were retained unaltered, also the wall-tie plates that indicate there were formerly heavily-loaded storage silos in Building 10c. Whereas the

Heritage Statement tries to cast doubt on the original presence of dormers, our photos on the next two pages show that their current appearance is unaltered. (The dormers were centred over the silos, for lighting and ventilation.)



3 May 1975

Photo MT Tucker



28 July 1973

Photo MT Tucker

The original canalside buildings were smartly designed in the 'functional tradition'. It is very likely that the flat roof of Building 12 was and is original, in the fireproof, filler-joist construction of the 1900s. The late-20th-century changes to the heritage buildings were modest compared with the current proposals. We do not agree with the Heritage Statement's claims in paragraph 67 that the previous changes have "greatly reduced legibility of the form, former use and identity".

3) The proposed scheme is detrimental to the historic buildings as follows:

- In the canal façade of Building 10c, it introduces large modern dormers, set forward in a tall roof, that are completely alien to the historic character.
- It destroys its distinctive original dormers and the roof structure.
- In the canal facade of Building 12, the traditional blind giant arcade is altered grotesquely, with raised-up and out-of-proportion upper windows (and small and clumsy extra windows) in the new doubleheight top storey. These fight against the building's character.
- It changes the scale and misleads as to this building's original scale.
- This building's probably original (c.1900) roof structure is lost.



Amended proposed elevation to canal, Building 10c (from D&A Stmt).

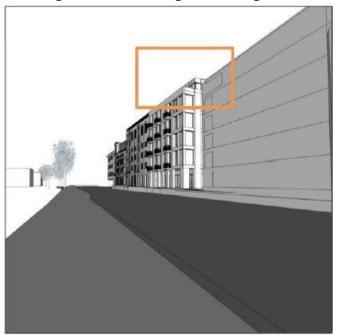


Amended proposed elevation to canal, Building 12 (from D&A Stmt).

4.1) The townscape of the Conservation Area as seen from the Canal will be harmed by the following features:

- Loss of authenticity in the appearance and fabric of its key historic buildings (see 3 above).
- The walls of Buildings 12 and 18 raised by a storey, making these already dominant façades extra dominant.
- The large dormers on Building 10c, a little smaller than they were to be but still dominating in size, position and style.
- New superstructures behind, 2 storeys higher than existing plant rooms. The effect of the now reduced superstructure in the western part of the site is discussed in (4.2) below. At the eastern end, above building 10c, the superstructure will be visible from the towpath above the raised roof, as seen in the view copied in (3).
- These raised walls and features behind will destroy the 'escapefrom-it-all' character of a previous age that this short section of canal still uniquely possesses.

4.2) The revision has set back and lowered by one storey the previously proposed superstructure above Buildings 12 and 18. The perspective immediately below, copied from the Heritage Statement Addendum, would make it appear that it will now hardly be seen from the canal above the heightened frontage buildings:



Canalside View (York bridge side) Amended Scheme

However, this perspective is of extremely wide angle, such as would not be acceptable in a CGI visualisation. It could not be seen without panoramic vision and in no way represents what a human observer would see (note how the further end of the building looks tiny relative to the nearer parts). It is taken too close to show views from a distance.

The visualisation below, from the previous Heritage and Townscape Statement, shows the visibility of the then-intended superstructure from the towpath further away, near Battlebridge Basin. Despite the lowering now by one storey, we think it will still be noticeable from there. Such a feature will loom above the heightened building lines and damage the placid character of the Conservation Area.



PREVIOUS SCHEME (from p.22 of the Heritage Statement), with  $3\frac{1}{2}$  storeys of superstructure looming at 'C', above the parapet levels, which are raised by a storey above existing at B. The  $3\frac{1}{2}$  storeys is now reduced to  $2\frac{1}{2}$  and with more setting-back.

5) On the street side, the new buildings will do much harm by their great height, sharp-edged design and excessively large plate glass windows. This is further emphasised by the change from the existing local idiom of pale yellow brick. In our opinion, they do not "offer improved architectural forms and character", contrary to the Heritage Assessment's conclusions, para. 120.

They will overpower Thorley's handsome Victorian office building, Building 10a, which perversely the Heritage Statement criticises for having been larger than its earlier neighbours. The overwhelming effect is seen in the visualisation on the next page, looking west along All Saints Street.



Visualisation from east along All Saints Street, from D&A Stmt p.58

In contrast to this, the existing Buildings 14 and 16 of 1991, by architects David Rock and John Townsend, match the parapet level of Building 10a and fit very well into the streetscape; this is contrary to the impression the submitted documents try to suggest. The façade is carefully modulated to break up its bulk and the yellow facing brick is in tune with that used in Caledonian Road during the first half of the 19th century and in the neighbouring modern buildings. Their limited street openings and "minimal streetside activity", remarked upon in the Design and Access Statement, present no problems for current street users.

Guided walks are regularly conducted for the public from the London Canal Museum past these buildings, which currently present a pleasant and appropriate aspect. Greater public access is not needed to the waterside from here, as the canal towpath is just around the corner.

6) Regarding Building 10a, the tall added storey in plate glass will have a crushing effect on this 1891 office building, which the set back will hardly relieve. The replacement of the existing mis-coloured parapet is tiny compensation.

7) In the Courtyard, continuous balconies are proposed across the westward-facing façade of Building 10b, considerably obscuring it. These balconies, the increased building heights and the reduced courtyard size will make the yard feel unpleasantly cramped and uncharacteristic of Islington. The increased footfall generated by the development will add to that problem.

8) The Council has a set of Design Guidelines for the Regent's Canal West Conservation Area, not referred to in the Heritage Statement. Guideline 17.7 states that

All new buildings must be on a scale appropriate to their location and any adjacent buildings of conservation value. Building Heights recently approved (and now largely implemented) should be regarded as a maximum for any future development in the conservation area...

while Guideline 17.8 states that

Buildings of greater scale, height or bulk than those existing will be out of keeping with the character of the conservation area.

The reference to 'Building Heights recently approved' probably refers to Kings Place, of a maximum of 8 storeys. That is a building of truly exceptional design, which should not be taken as a precedent for other developments that may come along.

9) All in all, the proposals are an affront to the character of the conservation area, which is one London's best industrial conservation areas. We do not see what benefits are presented that could justify the considerable harm done – the aim seems mainly to generate an opportunity for commercial investment.

GLIAS calls on the Council to refuse the application.

Yours sincerely,

Malcolm Tucker

Voluntary caseworker for the Greater London Industrial Archaeology Society