

Camden Lock Market

West Yard, East Vaults & Dead Dog Basin

Planning Statement
August 2022



GERALDEVE

Contents	Page	Appendices
1 Executive Summary	3	A Planning History
2 Introduction	5	
3 Site and Surroundings	10	
4 Planning History	13	
5 Development Proposals	16	
6 Pre-Application Engagement and Consultation 22		
7 Planning Policy Context	25	
8 Land Use	31	
9 Design, Bulk and Massing	44	
10 Heritage, Archaeology, Townscape and Views 49		
11 Energy and Sustainability	58	
12 Transport, Servicing and Waste	69	
13 Other Technical Considerations	80	
14 Planning Obligations and the Community Infrastructure Levy	90	
15 Summary and Conclusions	93	

1 Executive Summary

- 1.1 This planning application brings forward proposals for the refurbishment and improvement of Camden Lock Market, on behalf of Camden Lock Market Limited.
- 1.2 The market is within the commercial heart of Camden Town. It is a significant local and regional employer, being a key regional and international tourist destination. It has a physical and cultural heritage which is of value and contributes to its character. However, as a result of the pandemic, the footfall has declined and international tourism has fallen resulting in negative impacts on the markets and Camden Town.
- 1.3 The Applicant's vision is to create a unique destination where people can live, work, stay, shop and play to move effortlessly between daytime and night-time experiences. The future of Camden Lock Market is envisaged as a place which provides a high-quality environment and facilities to serve the communities who work and live in and around it. The markets should be attractive to people of all ages and provides a range of opportunities for local people. It is considered that the vision could be achieved by:
- a) Moving the traditional markets away from being predominantly a tourist attraction, re engaging a local audience;
 - b) Growing the leisure and family entertainment offer;
 - c) Opening up the Grade II East Vaults and Dead Dog Basin to the public for the first time;
 - d) Developing a greater connection with the local community through all year events, educational and cultural programme, including social and community initiatives and;
 - e) Increasing job opportunities for existing and new businesses, as well as the larger community.
- 1.4 The proposal aligns with Camden's 'We Made Camden' pledge and the Camden 2025 vision, as the Applicant intends to commit to:

a) working with local schools to provide learning opportunities, focussing on the history of the canal as part of a permanent exhibition within the East Vaults and the local geography which can be appreciated at the top of the temporary observation wheel;

b) developing the exhibition spaces and temporary observation wheel to promote both the international make up of Camden's diverse communities as well as look to promote international creative connectivity through music performances and visual arts;

c) developing actions to promote new heritage initiatives to disadvantage communities through working with community groups and the Knowledge Quarter; and

d) upgrading the existing unused heritage spaces and installing the temporary observation wheel to attract a wider more diverse audience from Greater London and beyond which in turn would contribute to the local economy by providing increased footfall and spending within Camden High Street and the Borough.

1.5 The Applicant seeks to redevelop Camden Lock Market in phases in order to keep the market trading during construction. This Town Planning Statement has been prepared in respect of Phase 1 which seeks to open up the Grade II Listed East Vaults and Dead Dog Basin to the general public for the first time, upgrade the shopfronts in West Yard and provide a temporary 40m tall observation wheel in the heart of the market to drive footfall. Phases 2 and 3 would come forward at a later date.

2 Introduction

- 2.1 Camden Lock Market Limited (herein referred to as “the Applicant”) is bringing forward a planning application for Phase 1 of Camden Lock Market, comprising the Grade II Listed East Vaults, Dead Dog Basin and West Yard (herein referred to as “the Proposed Development”).
- 2.2 The application proposals would regenerate one of the most internationally renowned and markets in London, enhancing its retail offer, offer new exhibition and cultural spaces and improve its public realm.
- 2.3 Since purchasing the site and adjacent markets in 2014, the Applicant has been upgrading the markets to improve the visitor experience and enhance the character and design of the existing markets. The vision over the next 5 years is to retain the markets independent traders, create prospects for new start-up businesses, offer destination points focused on local consumers and families thereby increasing the footfall and secure the future of the markets.
- 2.4 Planning permission and listed building consent for the redevelopment of this market was approved in 2016 under references 2015/4774/P and 2015/4812/L. However, this scheme was not implemented and expired in 2019 as the Applicant was developing Hawley Wharf and upgrading Stables Market.
- 2.5 The intention is to bring forward the approved 2016 Piercy and Co scheme in phases to allow the market to continue to trade throughout the build period. As a result of the pandemic, the Applicant is proposing to bring forward a temporary observation wheel for five years to attract additional footfall and dwell time within the market and Camden Town.
- 2.6 The description of development for the Proposed Development is:

“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.”

2.7 Listed Building Consent is also sought for:

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

2.8 In summary, the Proposed Development would deliver the following planning benefits:

- a) Provide public access into the Grade II East Vault and Dead Dog Basin;
- b) Provide a permanent educational exhibition space which would celebrate the history of the Regent’s Canal and provide a rolling programme of exhibition space working with local schools and groups;
- c) Provide a flexible exhibition space within the East Vaults linked to the temporary observation wheel and flexible exhibition/market space thereafter;
- d) Improve the retail units within the West Yard for market tenants;
- e) Provide a temporary observation wheel for a period of 5 years to attract footfall to the markets and Camden Town centre;
- f) Improve the quality of the food and drink offer;
- g) Reduce antisocial behaviour, noise, disturbance, and litter;
- h) A comprehensive refuse and recycling strategy in partnership with iRecycle;
- i) Attract families and the local community;
- j) Improve people’s access to and overall enjoyment of the canal;
- k) Provide employment opportunities; and
- l) Enhance Camden Town’s night-time economy of culture, entertainment, food, and drink should be broadened to appeal to the full range of visitors, especially older people and families.

2.9 This Town Planning Statement (herein referred to as “this Statement”) provides an assessment of the Proposed Development against the relevant national, regional and local planning policy framework for the Site. It is structured as follows:

- A description of the Site and its Surroundings at Section 3;
- A summary of the Planning History at Section 4;
- A description of the Development Proposals in detail at Section 5;

- A summary of the pre-application engagement with the London Borough of Camden and consultation with other stakeholders at Section 6;
 - A summary of the planning policy context at Section 7;
 - An assessment of the land use considerations at Section 8;
 - An assessment of the design, bulk and massing considerations at Section 9;
 - An assessment of the historic environment and townscape considerations at Section 10;
 - An assessment of the energy and sustainability considerations at Section 11;
 - An assessment of the transport, servicing and waste considerations at Section 12;
 - An assessment of other technical considerations at Section 13;
 - A summary of Planning Obligations (including draft Heads of Terms) and the Community Infrastructure Levy arising from the Proposed Development at Section 14; and
 - A summary and main conclusions of this Statement at Section 15.
- 2.10 The Proposed Development has been the subject of extensive pre-application discussions with officers at the London Borough of Camden (LBC), Canal and River Trust, Historic England, Greater London Authority (GLA) and local stakeholders, including local Ward Councillors, local schools and local communities.
- 2.11 This Statement provides an assessment of the Proposed Development in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) which requires planning applications to be determined in accordance with the Development Plan unless material considerations otherwise.
- 2.12 The adopted Development Plan for the Site comprises the London Plan (2021); and the Camden Local Plan (2017). The National Planning Policy Framework (the “NPPF”), (2021) is a material consideration, along with relevant supplementary planning policy guidance.

2.13 This Statement should be read in conjunction with the plans and drawings prepared by Piercy & Company and submitted as part of the planning application, as well as the following documents:

- Design and Access Statement including Lighting Assessment, prepared by Piercy & Company;
- Built Heritage Statement, prepared by Turley Heritage;
- Townscape Visual Impact Assessment, prepared by Turley Heritage;
- Schedule of Works, prepared by Piercy & Company and Turley Heritage;
- Archaeological Desk Based Assessment, prepared by MOLA;
- Retail Statement, prepared by Lab Tech;
- Cultural Plan, prepared by Lab Tech;
- Reinstatement Strategy, prepared by Piercy & Company;
- Operation Management Plan, prepared by Lab Tech;
- Statement of Community Involvement, prepared by London Communications Agency;
- Sustainability Statement, prepared by Arup;
- Detailed Circular Economy Statement, prepared by Arup;
- Whole Life Cycle Carbon Assessment for Refurbishment Works, prepared by Arup;
- Life Cycle Carbon Assessment for Observation Wheel, prepared by Arup,
- Energy Statement, prepared by GDMP;
- Transport Assessment including Framework Travel Plan, prepared by Arup;
- Delivery and Servicing Management Plan, prepared by Arup;

- Construction Management Plan, prepared by Arup;
- Pre Demolition Audit, prepared by Arup;
- Accessibility Statement, prepared by Arup;
- Noise Impact Assessment, prepared by GDMP;
- Air Quality Assessment, prepared by Waterman;
- Ground Investigation and Geotechnical Interpretative Report, prepared by CGL;
- Structural Report, prepared by Walsh;
- Preliminary Ecological Appraisal, prepared by Waterman;
- Fire Statement, prepared by Jenson Hughes; and
- Daylight and Sunlight Report, prepared by GIA.

2.14 The proposals would deliver important design, heritage and land use benefits. It is considered that the Proposed Development is in accordance with the objectives of planning policy and guidance.

3 Site and Surroundings

3.1 The Site, known as Camden Lock Market measures 0.43 hectares 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.

3.2 The existing market represents Camden's first arts and craft market which opened in 1972. The Site includes industrial and commercial buildings of varying sizes and ages. Generally, the market can be grouped into five distinct character areas:

Camden Lock Place: is located on the northern boundary of the site, bordered by the Gilgamesh building. This was once a historic towpath which circumnavigated the old wharves. Today, it is a pedestrianised market street providing multiple access points into Camden Lock Market and Stables Market.

Market Hall: This building was built in the 1990's in a mock Victorian style. The internal layouts are compromised by the varying levels making it a challenging environment for trading, accessibility and wayfinding.

Middle Yard: this area was originally used as the Dingwalls timber yard and the site's built form and open spaces reflect its industrial past. Today, this space is predominantly used for craft products. The original Dingwalls building comprises a multitude of poor quality extensions, stalls and light weight buildings to the west of the building. To the east of the Dingwalls building lies the market hall building.

West Yard: this space predominantly houses food stalls. This area was formerly known as Purfleet Wharf which used the canal basin to receive and transport goods.

East Vaults: situated beneath the Grade II listed 1900s 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.

3.3 The market contains a mix of permanent units and stalls uses which fall within Use Class E and sui generis.

3.4 In terms of its role and function within this part of the Borough, the Site forms an integral part of the wider Camden Market, being one of five popular markets including the Stables Market, Hawley Wharf, Inverness Street and Buck Street Market. The Applicant owns four of these markets.

Planning Designations

3.5 With regards to the Site's planning policy designations, it is located within Camden Town Centre, the Regent's Canal Conservation Area, Sub Area One (Camden Lock) and is designated as an Archaeological Priority Area. The Interchange Building which contains the East Vaults Dead Dog Basin is Grade II Listed. 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.

3.6 The site is located within the Camden Goods Yard section of the Draft Site Allocations Local Plan, 2020 which envisages:

- a) an area that celebrates its rich heritage with exemplary urban design and architecture;
- b) a place what is well connected and accessible to all, promotes health and wellbeing and is environmentally sustainable and responsible; and
- c) an environment that feels safe and welcoming by day and night.

3.7 Policy CGY8 of the Draft Site Allocations Local Plan 2020 seeks to support the intensification of the Site where uses are compatible with the creative and cultural strengths and character of Camden Town; responds to the industrial heritage; enhances the setting and public realm of the Interchange Building and helps to deliver a new connection between the Morrisons supermarket site (Camden Goods Yard) and Camden Lock Place.

3.8 The Site is well served by public transport services and has a Public Transport Accessibility Level (PTAL) of 6b given its proximity to Camden Town Underground station which is located 350 metres to the south of the site; Camden Road Overground station located 450

metres to the east of the Site. In addition, there are numerous bus routes which stop outside the Site. Further information on the Site's accessibility is contained within the Transport Assessment, prepared by Arup and submitted with the planning application.

4 Planning History

- 4.1 A thorough review of the online planning records held by Camden Council has been undertaken. The site has an extensive planning history, the key permissions are set out below.
- 4.2 Planning Permission was granted on 26 May 1999 under reference PE9900147 for the **'Erection of glazed roof and replacement balustrade railing to existing open balcony area at first floor level to the West Yard'**.
- 4.3 Planning permission was granted on 23 March 2000 under reference PE9900875 for **"The erection of a three storey building for use within Class A3 on the ground floor, as an Internet cafe (sui generis use) on the 1st floor and for studio/workshop use within Class B1 on the 2nd floor"** within Camden Lock Place.
- 4.4 Within the West Yard, planning permission was granted on 2 August 2001 under reference PEX0000395 for the **'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'**.
- 4.5 Planning permission was granted on 13 November 2001 under reference PEX0100733 for the **'Alterations to existing timber decking over canal basin to enable the mooring of three narrow boats'**.
- 4.6 Planning permission was granted under planning application reference 2005/3087/P for the **"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"**.

- 4.7 Conservation Area Consent was granted under 2005/3089/C for the **“Demolition of one and two storey timber structures on the east and west side of middle yard for replacement by two and three storey buildings”**.
- 4.8 Listed Building Consent was granted under 2011/3792/L for the **“Installation of new rubber lock protector to canal lock island”**.
- 4.9 Planning Permission and Listed Building Consent were approved in 2016 under reference 2015/4774/P and 2015/4812/L for the **“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; 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”**.
- 4.10 Planning permission was granted in 2017 under reference 2017/2378/P for the **“Temporary installation of 34 temporary market stalls (A5 Use) in the West Yard of Camden Lock Market”**. Condition 3 of the planning permission states **“The market stalls hereby permitted are for a temporary period only. The temporary structures shall be removed completely on, or before the 12 June 2022”**.
- 4.11 A further planning permission was granted on 20 May 2022 under reference 2022/1244/P for the **“Temporary installation of 30 market stalls (sui generis use) for a period of 18 months”**.
- 4.12 A planning application for the **“Removal of temporary flat roof and reconstruction of the Market Hall Building roof to match original roof”** was granted 27 April 2021 under reference 2021/1040/P.
- 4.13 In respect of the Middle Yard, planning permission was granted 24 February 2022 under reference 2021/5328/P for the **“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”.

4.14 Full planning history for the Site can be found in Appendix A of this Statement.

5 Development Proposals

5.1 Planning permission is sought for the:

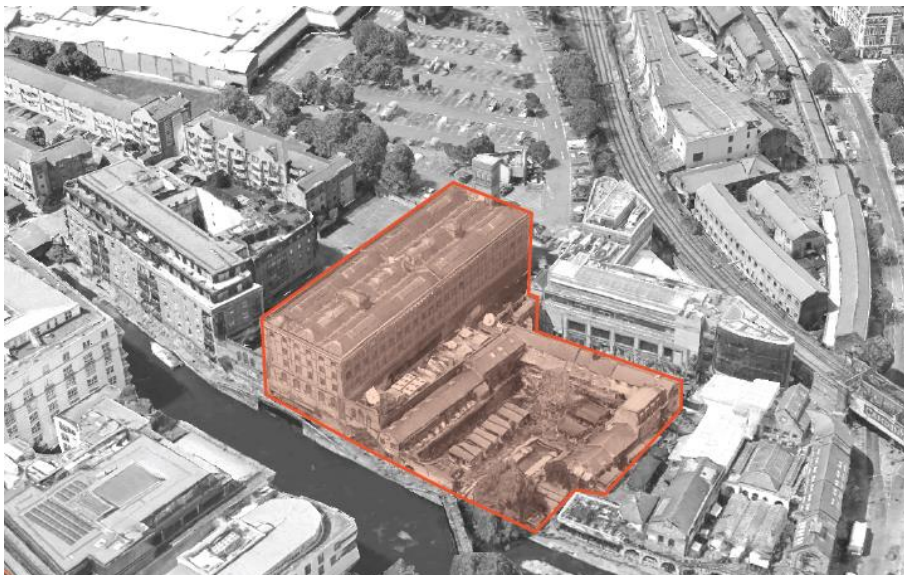
“Introduction of new exhibition space, flexible events and market uses through a change of use of the existing East Vaults, installation of new retail shopfronts within West Yard; creation of a new jetty within Dead Dog Basin and erection of a temporary observation wheel together with ancillary works and alterations to existing structures, surfaces and other public realm improvements and associated works.”

5.2 Listed Building Consent is sought for the:

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

5.3 The Proposed Development is described in detail in the Design and Access Statement. This Statement should be read in conjunction with the suite of the other technical reports and drawings supporting this planning and listed building consent application.

5.4 The existing site has been split into three development phases shown below. This Proposal seeks permission for Phase 1 only.



- 5.5 Phases 2 relates 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.
- 5.6 Phase 3 relates to the development of the 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.
- 5.7 Phases 2 and 3 are likely to come forward at a later date.
- 5.8 For some time, even before the impact of COVID-19 pandemic and the uncertainties of Brexit, Camden Town has been facing a number of growing challenges. Following a CACI marketing report in 2018, the Applicant's vision is to continue to create unique experiences across Camden Markets, combining leisure, food, drink and retail. The Applicant's aim is to support the market tenants, create a platform for growth, and to improve the accessibility of the market for the consumer.
- 5.9 The Applicant's strategy to enhance the markets is as follows:
- a) Move the traditional markets away from being predominantly a tourist attraction and engage a local audience;
 - b) Grow the leisure and family entertainment offer;
 - c) Develop a greater connection with the local community through a strong, all year events and educational/ cultural programme, including social and community initiatives; and
 - d) Increase job opportunities for existing and new businesses, as well as the wider community.
- 5.10 Progressing forward over the next five years, the Applicant aims to trigger a Camden renaissance, moving away from the current local perception that Camden has faded from its former glory by updating and improving the offer for all. As part of this, and in line with the postponed Regent's Canal Bicentenary celebration, the Applicant is planning to open up the Dead Dog Basin and East Vaults to the public for the first time for community activities, exhibitions and learning. In addition, the proposed installation of the temporary

Observation Wheel for five years is intended to become both a popular leisure attraction and a centre piece for Camden Town.

- 5.11 The Applicant would work with various local educational institutions and charities to provide tickets for local families to learn more about the integral history of the Regent's Canal, which revolutionised trade in London in the 19th Century in the opening exhibition. The Applicant is committed to providing discounts to local schools and families to use the proposed temporary wheel in order that children and families can see Camden from a bird's eye perspective. These commitments would be set out in a S106 agreement.
- 5.12 The Proposed Development seeks to upgrade the existing market units within the West Yard in a contemporary industrial design to complement the rest of the market. A new pavilion building is proposed to the southern perimeter of West Yard which would replace the existing storage and kitchen block. The existing West Yard tenants would be relocated into the 'triangle building' at Stables Market.
- 5.13 Dead Dog basin would be dredged and opened up to the public for the first time to allow families, Londoners and tourists to explore the Grade II listed building. The proposed exhibition space within the East Vaults would be light, airy and bright. The main entrance to the exhibition space and Dead Dog Basin would be from the existing arched entrance along Camden Lock Place. A secondary route would be available via West Yard.
- 5.14 The Proposed Development includes a number of new openings between the East Vaults and Dead Dog Basin. The London Waterbus company would be relocated from the existing West Yard basin into Dead Dog basin and the canal trips will start and end from this historic location, via a new canal boat jetty.
- 5.15 The East Vaults would be sensitively refurbished to provide an exhibition space which would in the first instance celebrate the history of the Regents Canal in partnership with the Canal and Rivers Trust. It is envisaged that local schools would be able to visit this space to learn about local history.

- 5.16 A separate flexible exhibition/events/sui generis market space would also be provided within the East Vaults which would be linked to the observation wheel and in the longer term would provide flexible space for events and future market tenants.
- 5.17 A dedicated ticket office for the wheel and events space is proposed in a vacant retail unit at the top of Camden Lock Place adjacent to the entrance into East Vaults. This office would be wheelchair accessible.
- 5.18 A dedicated waste store for all the markets is also proposed within the East Vaults. The Applicant has engaged with iRecycle, a sustainable waste management firm which would manage the waste generated by the markets which the Applicant owns. The waste would be stored within the East Vaults and collected by barge and then recycled.
- 5.19 A 40m tall temporary observation wheel is proposed within the heart of the West Yard. The proposed observation wheel would allow for an unbridled view of the Regent's Canal and the landscape of London. It would provide an additional reason for customers to visit the Market which in turn would extend dwell time and expenditure for businesses.
- 5.20 The structure of the wheel has been designed to minimise the impact on the cobble sets and basin. The wheel is proposed to be in situ for five years to attract footfall and dwell time within the market and Camden Town. The wheel would be re-sold in its entirety after five years and Phase 2 of the market would be redeveloped to create new market space in accordance with the previous permission. A Reinstatement Strategy has been prepared in support of the planning application and is explained in detail in Chapter 10 of this Statement.
- 5.21 The Proposed Development includes 26 short stay cycle spaces which would be located at the foot of the wheel. Ancillary works including the planting of a new tree and a UKPN substation are also proposed.

Land Use Summary

- 5.22 Table 1 sets out the overall areas across the Phase 1 proposals. The East Vaults currently measure 873 sqm GIA and used for back of house market uses (storage and waste).

Therefore, whilst Table 1 below shows a loss of 439 sqm of sui generis market, it does not equate to the loss of any jobs or market stalls.

Table 1 Existing and Proposed Floor areas by Use Class

Use Class	Existing GIA sqm	Proposed GIA sqm	Difference in GIA sqm
Sui generis market	2,160	1,721	-439
Flexible F1/E	0	377	+377
F1 educational exhibition space	0	116	+116
Total	2,160	2,214	+54

Flexible Market Uses

- 5.23 The Proposed Development includes upgraded shopfronts in the West Yard. These units would be used for food and beverage and market retail. The shopfronts have been designed to complement the shopfronts approved earlier this year in the Middle Yard.
- 5.24 The flexible exhibition space would, in the first instance, be linked to the temporary wheel. In the longer term, this space could be used for market uses or event space.

Public Realm

- 5.25 The public realm strategy has been designed to improve accessibility around the West Yard. A temporary pedestrian bridge measuring (approximately) 7.5m in length and 2.8m in width is proposed across the existing basin in West Yard to improve accessibility. The bridge has been designed to be as open as possible to allow the basin to be appreciated. Raised decking is also proposed to provide a gradual level change to enable step free ramped access to the level entrance of the observation wheel gondolas. The bridge would be removed at the same time as the temporary wheel.

- 5.26 Temporary seating, a new tree (*Robinia pseudacacia*) and planting would also be provided. Further details are contained within the Design and Access Statement prepared by Piercy and Company.
- 5.27 The Proposed Development also includes eight toilets, one wheelchair accessible toilet and baby changing facilities.
- 5.28 The Applicant has instructed Studio Fractal to prepare a lighting strategy to upgrade the lighting within the West Yard, East Vaults and Dead Dog Basin. The proposals seek to install flexible lighting solutions with minimal impact on the existing fabric, via the use of clips onto the existing beams and surface fixed conduits to minimise drilling through the existing fabric as much as possible. Further details are contained within the Design and Access Statement prepared by Piercy and Company.

6 Pre-Application Engagement and Consultation

- 6.1 The Localism Act 2011 emphasises the need for effective and meaningful pre-application consultation.
- 6.2 Paragraphs 39-46 of the National Planning Policy Framework (NPPF) highlights the important of pre-application engagement and front loading; early engagement has significant potential to improve the efficiency and effectiveness of the planning system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improves outcomes for the community.
- 6.3 Local Planning Authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage and the more issues that can be resolved at pre-application stage, the greater the benefit.

Community Consultation

- 6.4 A public consultation exercise was carried out by the London Communications Agency in Summer 2021 whereby market tenants, local residents, ward councillors, amenity societies, businesses, local schools and the Canal and River Trust were informed of the proposals and a website was provided to describe the proposals in more detail. Boat tours were arranged with key stakeholders to explore the Dead Dog Basin.
- 6.5 In February and March 2022, the engagement strategy was relaunched and a series of meetings were held with ward councillors, community groups, local schools, residents and youth groups. A webinar was arranged in March 2022, alongside a public exhibition.
- 6.6 A number of comments were providing with many supporting the scheme. Concerns were raised in relation to accessibility and overcrowding and attracting a tourist market rather than a market for families and children. Others questioned the temporary nature of the observation wheel, the impact on key views and anti social behaviour. Further details are provided within the Statement of Community Involvement prepared by London Communications Agency and submitted with the planning application.

London Borough of Camden

- 6.7 A number of pre application meetings were undertaken in 2021 and 2022 to discuss the proposals in greater depth. The design of observation wheel was amended between 2021 and 2022.

Design Review Panel

- 6.8 A meeting was held in June 2021 where the proposals were discussed. It should be noted that an alternative wheel design was presented in this meeting. Overall, the scheme was seen as an exciting development of the area. Members of the panel raised concerns over the covering of the West Yard Basin and sought clarification on the pedestrian flow strategy around the proposed wheel. Clarification was also requested on the recycling options for the wheel.

Historic England

- 6.9 The Applicant team met Historic England in January 2022. Officers welcomed the proposed works to the Interchange Warehouse, Dead Dog Basin and the buildings around the West Yard and considered the proposals to bring heritage benefits through the revealing of previously inaccessible historic areas of the site to the public, as well as securing the refurbishment and repair of the historic buildings, many of which were noted as being in need of repair and regeneration.
- 6.10 Officers considered that a lightweight metal bridge which retains views through to the canal inlet would cause less harm than a solid structure that restricts views. Officers also considered that *“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 and would need to be justified in terms of public benefits”*. Officers also stated that *“We acknowledge that these proposals are temporary in nature but will still need to be considered in light of planning policies”*.

Canal and River Trust

- 6.11 The trust welcomed the revisions to the wheel which sought to keep the West Yard basin open. Further details relating to the structure of the wheel were requested.

Greater London Authority

- 6.12 The Greater London Authority (GLA) supported 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. The proposal for opening up the East Vaults/Dead Dog Basin to the public using the cultural exhibition space to promote the history of the market and the canal was fully supported. GLA officers advised that subject to the provision of a Heritage Impact Assessment and further detail design comments, officers would be supportive of the temporary observation wheel in principle.
- 6.13 On the basis of the feedback, the design has continued to further evolve. Further information is contained within the Statement of Community Involvement, prepared by London Communications Agency and the Design and Access Statement, prepared by Piercy and Company.

7 Planning Policy Context

- 7.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 7.2 Planning policy operates at national, regional and local levels. At a national level, Central Government adopted the National Planning Policy Framework (NPPF) in March 2012. The latest amendments to the NPPF were published in July 2021.
- 7.3 The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises:
- The London Plan (2021); and
 - LBC's Development Plan which consists of the Local Plan (2017), Policies Map, Site Allocations Document (2013) and various Area Plans.
- 7.4 Both the London Plan and LBC's Development Plan are supported by various adopted Supplementary Planning Guidance documents which are also material considerations.
- 7.5 In terms of emerging policy, Paragraph 48 of the NPPF states that local planning policies may give weight to relevant emerging policies, taking into account the stage of preparation of the emerging plan, the extent to which there are unresolved objections to emerging policies, and the degree of consistency those emerging policies have with regard to the wider development framework. The Draft Site Allocations Local Plan (2020) has been considered in the context of this proposal.

Statutory Tests

- 7.6 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that Local Planning Authorities should pay special regard to the desirability of preserving a listed building or its setting or any features of historic or architectural interest which it possesses when considering applications.

- 7.7 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

National Planning Policy and Guidance

The National Planning Policy Framework 2021

- 7.8 The Ministry of Housing, Communities and Local Government (now Department for Levelling Up, Housing and Communities) published the revised NPPF in 2021. This follows the 2019 revision of the NPPF originally published in 2012.
- 7.9 The NPPF sets out the Government's economic, environmental and social planning policies for England. It summarises, in a single document, all previous national planning policy advice (contained within PPG and PPS). Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 7.10 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. The NPPF explains that the policies of the Framework, taken as a whole, constitute what the Government considers sustainable development to mean in practice.
- 7.11 The presumption in favour of sustainable development in the new policy guidance is designed to ensure that the planning system as a whole focuses on opportunities. The presumption, in practice, means that significant weight should be placed on the need to support economic growth and housing delivery through the planning system and Local Planning Authorities should plan positively for new development and approve all individual proposals wherever possible. However, development should not be allowed if it would undermine the key principles of sustainability in the NPPF.

7.12 The NPPF makes clear that the policies should apply unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits (paragraph 49). Specifically, paragraph 19 states that the planning system should do all that it can to promote sustainable economic growth in order to create jobs and homes to meet the challenges of global competition alongside a low carbon future. The NPPF states that significant weight should be placed on the need to support economic growth and housing delivery through the planning system.

Planning Practice Guidance 2014 (as amended)

7.13 National Planning Practice Guidance (NPPG) is an online resource which is maintained by the Department for Levelling Up, Housing and Communities and is regularly updated. It provides guidance relating to a number of planning matters, the Conserving and Enhancing the Historic Environment PPG is considered relevant to the Proposed Development.

7.14 The NPPG was published in March 2014 and has been varied and supplemented on a number of occasions since.

The London Plan 2021

7.15 The London Plan (published 2 March 2021) is the overall strategic plan for Greater London, defined to include the 32 Boroughs and the City of London. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas and forms part of the Statutory Development Plan.

7.16 The London Plan is centred around ‘Good Growth’, with a focus on building strong and inclusive communities, making the best use of land, creating a healthy city, growing a good economy and increasing efficiency and resilience. The Plan recognises the key role of Central London as a driver for London and the wider UK economy with the City of London and the wider CAZ being critical in supporting growth.

Local Planning Policy

Camden Local Plan 2017

- 7.17 At a local level, LBC's Local Plan (2017) was adopted by Council on 3 July 2017 and replaced the Core Strategy and LBC's Development Policies document as the basis of planning decisions and future development in the borough. This, coupled with LBC's Proposals Map and Site Allocations Plan (2013) forms the local tier of the Development Plan and is therefore central to planning decisions and the control of future developments in the borough.

Other Material Considerations

- 7.18 Other relevant LBC Supplementary and Design Guidance Documents of relevance to this application are as follows:

Camden Planning Guidance Documents

- 7.19 The following Camden Planning Guidance Documents are relevant to the proposed development:

- Access for All (March 2019);
- Air Quality (January 2021);
- Amenity (January 2021);
- Biodiversity (March 2018);
- Design (January 2021);
- Developer Contributions (March 2019);
- Energy Efficiency and Adaptation (January 2021);
- Planning for Health and Wellbeing (January 2021);

- Town Centres and Retail (January 2021);
- Transport (January 2021); and
- Water and Flooding (March 2019).

Emerging Planning Policy

Site Allocations Local Plan Update

- 7.20 LBC first consulted on its draft Site Allocations Local Plan (SALP) between 13 February and 27 March 2020. A second round of consultation was undertaken between 30 November 2021 and 24 January 2022 to reflect national, regional and neighbourhood level planning changes. A publication draft would then be consulted upon before the SALP is submitted to the Secretary of State for an Examination in Public (EIP). Adoption is not anticipated until 2023/2024. The emerging SALP builds on the Council’s existing adopted policies and sets out how the Council expects key development areas and sites in the borough to be developed.
- 7.21 Within the consultation draft SALP, the Site falls within the Camden Goods Yard Area as Camden Lock Market and the Interchange (CGY8). The draft Site Allocation identifies that *“Camden Lock Market is allocated for additional market and appropriate employment uses which help to sustain its role and function”*.
- 7.22 Policy CGY8 goes on to state that intensification of the Site will be *“supported where this delivers uses compatible with the creative and cultural strengths and character of Camden Town, sensitively responds to the industrial heritage of the Regent’s Canal Conservation Area by retaining, respecting and enhancing buildings/structures which positively contribute to the Area’s character and identity and retain historic street furniture and surfaces, and trees of significant value, and ensure that changes in the way the Market is operated are acceptable in terms of local environmental conditions”*.
- 7.23 Whilst this draft Plan is still at an early stage, and currently limited weight can therefore be given to it, the aspirations of the draft SALP have been taken into account in the assessment of the Proposed Development.

Site Specific Designations

7.24 Within the LBC Local Development Framework, the Site has the following designations:

- Camden Town Centre;
- Regent's Canal Conservation Area;
- Archaeological Priority Area;
- Grade II Listed – The Interchange Building;
- London View Management Framework – 2B.1; and
- Draft Site Allocation – Camden Lock Market and the Interchange (Policy CGY8).

Key Planning Considerations

7.25 The development proposals have been assessed against the following principal planning matters:

- Land Use;
- Design, Bulk and Massing;
- Heritage, Townscape and Views;
- Energy and Sustainability;
- Transport, Servicing and Waste; and
- Other Technical Considerations.

7.26 The following section of this Statement addresses the Proposed Development against National, Regional and Local policies.

8 Land Use

8.1 The land use section of this Statement is structured as follows:

1. Principle of Development;
2. Town Centre Uses; and
 - a) Retail
 - b) Visitor Economy and Culture
3. Mixed use.

1. Principle of Development

8.2 Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to-date Local Plan should be approved. For the reasons set out within this chapter, the Proposed Development is considered to be in accordance with the key policies contained in the development plan and represents sustainable development.

8.3 Chapter 1 of the London Plan sets out how growth should be managed in the Capital to build strong and inclusive communities, making the best use of land, creating a healthy city, delivering the homes Londoners need, growing a good economy and increasing efficiency and resilience.

8.4 London Plan Policy GG1 encourages development to seek to ensure changes to the physical environment achieve an overall positive contribution to London.

8.5 London Plan Policy GG2(C) sets out that development should proactively explore the potential to intensify the use of land to support additional workspaces, promoting higher density development, particularly in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. London Plan Policy GG2(D) highlights that proposals should use a design-led approach to determine the optimum development capacity of sites.

8.6 London Plan Policy D3 requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites.

8.7 Policy G1 of the Local Plan sets out how the Council will create conditions for growth to deliver homes, jobs and infrastructure by supporting development that makes the best use of the site, providing a mix of uses in accessible parts of the Borough (including self-contained housing) to deliver 16,800 new homes, 695,000 sqm of new office floorspace and 30,000 sqm of new retail floorspace by 2031. The Council anticipate the most significant growth to be delivered across the Borough, with Central London playing a key role in facilitating that growth.

Assessment

8.8 The Proposed Development seeks to enhance the market by upgrading the existing West Yard market stalls and utilising the East Vaults, which have previously been used as back of house storage for the market, to educational and cultural events and market uses. The new retail shopfronts have been designed to complement the industrial nature of the area.

8.9 The introduction of a temporary observation wheel for a period of five years makes the best use of the site by generating additional footfall into the markets and Camden Town Centre. 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.

8.10 It is therefore considered that the Proposed Development accords with National, Regional and Local policy given the enhancements to Camden Town Centre.

2. Town Centre Uses

8.11 Paragraph 86 of the NPPF states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. It goes on to state that main town centre uses should be located in town centres but also states that planning policies should

recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

- 8.12 Policy SD7 of the London Plan states that “when considering development proposals, boroughs should take a town centres first approach”. The sequential test should be applied for main town centre uses, requiring them to be located in town centres.
- 8.13 Policy SD8 of the London Plan sets out that “the changing roles of town centres should be proactively managed in relation to the town centre network as a whole”. It goes on to read that this process should “support sustainable economic growth across the Greater London boundary to enhance the vitality and viability of London’s centres and complement those in the Wider South East”.
- 8.14 Policy TC2 of Camden’s Local Plan states that the Council will “promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors. We will:
- a) seek to protect and enhance the role and unique character of each of Camden’s centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located
 - b) provide for and maintain a range of shops including independent shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy, and choice
 - c) make sure that food, drink, entertainment, and other town centre uses do not have a harmful impact on residents and the local area...
 - e) pursue the individual planning objectives for each centre, as set out in supplementary planning document CPG on town centres and retail, and through the delivery of environmental, design, transport and public safety measures”.
- 8.15 Policy TC4 of Camden’s Local Plan states that “the Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the

amenity of neighbours”. To manage any potential harm to amenity or the local area, the Council would use planning conditions and obligations.

Assessment

8.16 The paragraphs below provide a summary and assessment of the relevant planning policies for each proposed Town Centre use.

a) Retail

8.17 At a national level, chapter 7 of the NPPF sets out the framework to protect the vitality of town centres.

8.18 Paragraph 86 seeks to define a network of town centres, seek to retain and enhance existing markets and allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed and the anticipated needs for retail, leisure, office and other main town centre uses over a ten year period.

8.19 At a regional level, London Plan Policy E9 states that “a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported” in line with the wider objectives of the Plan, particularly for town centres. Policy E9 goes on to state that “Development Plans and development proposal should support London’s markets in their full variety, including street markets, covered markets, specialist and farmers’ markets, complementing other measures to improve their management, enhance their offer and contribute to local identity and the vitality of town centres and the Central Activities Zone”.

8.20 Policy E9 of the London Plan also states that clusters of retail and associated uses will be managed “having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including:

- a) Town centre vitality, viability and diversity
- b) Sustainability and accessibility

- c) Place-making or local identity
- d) Community safety or security
- e) Mental and physical health and wellbeing”.

8.21 Furthermore, Policy E9 also states that “development proposals involving the redevelopment of surplus retail space should support other planning objectives and include alternative town centre uses on the ground floor where viable...and residential development”.

8.22 At a local level, Policy TC1 states that “the Council will focus new shopping and related uses in Camden’s designated growth areas and existing centres, having regard to the level of capacity available in these locations.” In terms of distribution of retail across Camden, this will be within Growth Areas, Town Centres, Central London Frontages and Neighbourhood Centres, specialist shopping areas, and small shops outside of centres. It states that “retail floorspace is expected to be supported by a range of other town centre uses, including food, drink and entertainment uses”.

8.23 Policy TC6 of the Local Plan states that “the Council will promote and protect markets in Camden”. It goes on to set out that the Council will:

- a) Resist the permanent loss of market uses unless comparable replacement provision is made or there is no demand for continued market use;
- b) Take into account the character of the existing market when assessing proposals for the refurbishment and redevelopment of markets; and
- c) Support markets that will not cause individual or cumulative harm to the local area.

Assessment

- 8.24 A CACI research report commissioned by the Applicant in 2018 identified three ACORN¹ groups that are under-represented in the market compared to competitors. The report also identified an opportunity to bring more local people into the market.
- 8.25 A further CACI survey carried out in spring 2022 investigated the type of messaging and offers which would encourage the ACORN to visit more regularly. The Proposed Development, which is located within Camden Town Centre builds on the report findings and seeks to upgrade the existing market and encourage footfall and dwell time, thereby increasing opportunities for market tenants. As part of this objective, the Applicant is committed to improving the facilities and working environment where retail concepts can be clearly identified, reduce cluttering, and enhance the market experience as a whole.
- 8.26 The Applicant has chosen to phase the 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.
- 8.27 The Applicant expects new start-up businesses to blossom in the coming months and is prepared to respond to an increased demand for reduced size units. A range of flexible retail unit sizes within the upgraded West Yard is therefore proposed in Phase 1. The flexible space within the East Vaults is also proposed to be used by market tenants.
- 8.28 The temporary observation wheel is proposed to attract families, school children and visitors to the site which in turn would encourage expenditure elsewhere within Camden Town Centre. A permanent educational/cultural space is also proposed which would enhance the town centre.
- 8.29 Further information is contained within the Retail Statement prepared by the Applicant and submitted with the planning application.

¹ Acorn is CACI's consumer segmentation model. Acorn combines geography with a wide range of demographics and lifestyle data sources to group the entire population into 5 Categories, 17 Groups and 62 Types. Acorn will be used in order to provide a true understanding of the role that demographics plays in impacting the performance of a location.

8.30 The proposals therefore accord with National, Regional and Local policies.

b) Visitor Economy and Culture

8.31 As set out in the town centre section of this chapter, the NPPF sets out guidance in relation to enhancing the vitality of town centres. Appendix 2 of the NPPF defines town centre uses as ‘Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)’.

8.32 Policy E10 of the London Plan sets out that “London’s visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure”.

8.33 Policy E10 goes on to state that “the special characteristics of major clusters of visitor attractions and heritage assets and the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted”.

8.34 London Plan Policy HC5 seek the “continued growth and evolution of London’s diverse cultural facilities and creative industries is supported”. Policy HC5 goes on to set out that development proposals should “protect existing cultural venues, facilities and uses where appropriate and support the development of new cultural venues in town centres and places with good public transport connectivity”. In order to support this, Policy HC5 explains that “Boroughs are encouraged to develop an understanding of the existing cultural offer in their areas, evaluate what is unique or important to residents, workers and visitors”.

8.35 Policy HC5 of the London Plan also outlines that development proposals should “identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, venues

and related uses defined as Cultural Quarters, especially where they can provide an anchor for local regeneration and town centre renewal”.

- 8.36 Furthermore, Policy HC5 sets out that development proposals should “consider the use of vacant properties and land for pop-ups or meanwhile uses for cultural and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in town centres, Cultural Quarters and other areas”.
- 8.37 Policy HC6 of the London Plan states that “boroughs should develop a vision for the night-time economy, supporting its growth and diversification”.
- 8.38 In addition, Policy HC6 sets out that in development plans, town centre strategies and planning decisions, boroughs should:
- 1) Promote the night-time economy, where appropriate, particularly in the Central Activities Zone, strategic areas of night-time activity, and town centres where public transport such as the Night Tube and Night Buses are available
 - 2) Improve access, inclusion and safety, and make the public realm welcoming for all night-time economy users and workers
 - 3) Diversify the range of night-time activities, including extending the opening hours of existing daytime facilities such as shops, cafes, libraries, galleries and museums
 - 4) Address the cumulative impact of high concentrations of licensed premises on anti-social behaviour, noise pollution, health and wellbeing and other issues for residents and nearby uses, and seek ways to diversify and manage these uses
 - 5) Ensure night-time economy venues are well-served with safe and convenient night-time transport
 - 6) Protect and support evening and night-time cultural venues such as pubs, night clubs, theatres, cinemas, music and other arts venues.
- 8.39 Camden Local Plan Policy C3 states that the Council will seek “opportunities for new cultural and leisure facilities in major, mixed-use developments and support the temporary use of vacant buildings for cultural and leisure activities”.

- 8.40 In addition, Policy C3 outlines that “large-scale facilities should be located whereas many people as possible can enjoy their benefits and make use of public transport to get there. Central London and town centres, will, therefore, be the most appropriate locations”.
- 8.41 Camden has published a document called ‘We Make Camden’ which builds on Camden’s 2025 Vision. The ambition for Camden is to:
- a) be a borough where every child has the best start in life;
 - b) create a strong, sustainable and inclusive local economy;
 - c) tackle injustice and inequality, creating safe, strong and open communities;
 - d) have a place they call home; and
 - e) be green, clean, vibrant, accessible and sustainable.

Assessment

- 8.42 The Applicant aims to trigger a Camden Market revival, moving away from the current local perception that the Market has faded from its former glory by updating and improving the offer for the modern customer and the local Camden community. As part of this, and in line with the postponed Regent’s Canal Bicentenary celebration, the Applicant is seeking to sensitively refurbish and open the East Vaults and Dead Dog Basin to provide a public exhibition on the history of the Regent’s Canal, interpreting its impact on the development of Camden and showcasing a diverse cultural programme. It would include an information Centre, flexible exhibition space and a permanent cultural exhibition space and learning activities for community groups and key stakeholders.
- 8.43 The Dead Dog Basin is proposed to stand as a permanent mooring location for canal boats with a new jetty, servicing the Water bus with public access from Camden Lock Place.
- 8.44 The Applicant recognises that exhibition spaces are an important way to bring communities and local artists closer together. The Applicant would promote the exhibition spaces through the Camden Market website and social media, regular mailshots to Camden Learning, Camden STEAM, Camden’s Cultural Education Partnership (SPARK), Cultural

Camden, KQ partners, community partners, Camden Summer University, Integrated Youth Services and the Love Camden website.

- 8.45 The exhibition space contained within the East Vaults would be light, airy and bright, highlighting and accentuating the proposed sensitive renovation. Toilets and waste facilities would also be provided within this space.
- 8.46 Following pre application discussions with a number of key stakeholders, including local schools, the Applicant would ensure an allocation of time/tickets for each exhibition is offered to local schools, youth and community organisations free of charge on a limited basis including discounted tickets.
- 8.47 The Applicant intends to link the flexible space to the temporary observation wheel in the first instance and will work with key educational and heritage partners to curate the space for the flexible exhibition space including an information centre and temporary interpretation displays for the temporary observation wheel.
- 8.48 A temporary observation wheel is proposed to encourage families and the wider community into the market. These proposals seek to re-establish Camden Town as a leading destination for culture, leisure and heritage learning in London, with new entertainment spaces and cultural events throughout the year that are suited to all ages.
- 8.49 The proposed temporary observation wheel will allow for an unbridled view of the Regent's Canal and the landscape of London, from Paddington in the West to Limehouse in the East. The Applicant has met with a number of local schools to discuss the proposals and ways in which schools could benefit from the proposal in terms of enhancing their educational experience of the local area.
- 8.50 Through the Cultural Plan, the Applicant would work in partnership with Camden's schools and youth organisations to support the implementation of the Talent Pledge offering workplace visits, mentoring and work experiences where possible to the new heritage and exhibition spaces and wheel.

- 8.51 The proposal aligns with Camden’s ‘We Made Camden’ pledge and the Camden 2025 vision by committing to:
- a) working with local schools to provide learning opportunities, focussing on the history of the canal as part of a permanent exhibition within the East Vaults and the local geography which can be appreciated at the top of the temporary observation wheel;
 - b) developing the exhibition spaces and temporary observation wheel to promote both the international make up of Camden’s diverse communities as well as look to promote international creative connectivity through music performances and visual arts;
 - c) developing actions to promote the new heritage initiatives to disadvantage communities through work with community groups and the Knowledge Quarter; and
 - d) upgrading the existing unused heritage spaces and installing the temporary observation wheel to attract a wider more diverse audience from Greater London and beyond which in turn would contribute to the local economy by providing increased footfall and spending within Camden High Street and the Borough.
- 8.52 With respect to visitor experience, the Observation Wheel would operate a fully timed ticketing system, based on flights every 20 minutes. Visitors would be able to purchase tickets in advance of their visit date on site, by phone, via third party companies, on the attraction’s own website or within the dedicated Ticket Office located in Camden Lock Place.
- 8.53 The Ticket Office would be located in Unit 527 on the ground floor of Camden Lock Place. This location has been appropriately chosen to prevent queuing within the West Yard and is wheelchair accessible.
- 8.54 Security for the Proposed Development, in particular the Observation Wheel, would be integrated into the site wide security for Camden Market with additional measures put in place to manage the additional tasks that are specific to the Observation Wheel.
- 8.55 The existing site benefits from extensive CCTV coverage that feeds into the large CCTV control room which is permanently staffed and has direct communication with the

emergency services. This CCTV coverage will be maintained throughout the duration of the temporary Observation Wheel installation.

- 8.56 It is proposed that the Observation Wheel would have a designated supervisor, who would be in close contact with the LabTech security representatives and would provide a service for visitors requiring assistance whilst answering general queries, being vigilant, using their training and responding to any threats appropriately.
- 8.57 An Operational Management Plan has been prepared and submitted as part of the planning application by LabTech and will be the subject of informal reviews with the LBC from the commencement of operations.
- 8.58 The proposals seek to upgrade the existing West Yard retail units and bring forward unused market floorspace to create a new retail and leisure destination in the heart of Camden Town. Accordingly, the proposal accords with National, Regional and Local policies.

Mixed Use

- 8.59 Promoting mixed-use development is one of the core principles of the NPPF and it suggests at paragraph 120 that mixed use developments can promote healthy communities.
- 8.60 At a local level, housing is Camden's key priority land use. Policy H2 contained within the Camden Local Plan considers that in all parts of the Borough, the Council will encourage the inclusion of self-contained homes. In the Central London Area and the town centres of Camden Town, Finchley Road/Swiss Cottage and Kilburn High Road where a proposal will increase the total gross floorspace by more than 200 sqm, the Council will expect a contribution to the supply of housing. Where appropriate, the Council will negotiate up to 50% of additional gross floorspace (GIA) as housing, including a proportion of affordable housing.
- 8.61 The Council will require any secondary uses to be provided on site, particularly where 1,000 sqm (gross) of additional floorspace or more is proposed. Where inclusion of a secondary use is triggered by policy but cannot practically be achieved on the site, the Council may

accept a contribution to the mix of uses elsewhere in the area, or exceptionally, a payment in lieu.

8.62 Using policy H2, Table 2 provides information on the proposed land uses:

Table 2: Existing and Proposed Land uses

Land Use	Existing floorspace sq.m	Proposed floorspace sqm	Difference + sqm
Non residential	2,160	2,214	+54 sqm

8.63 Policy H2 does not apply to the Proposed Development as the permanent floorspace is 54 sqm and does not trigger the 200sqm threshold.

9 Design, Bulk and Massing

- 9.1 The Section considers the Proposed Development against relevant National, Regional and Local design policy and guidance. This Section should be read alongside the Design and Access Statement, prepared by Piercy and Company and submitted with the planning application.
- 9.2 The Government attaches great importance to the design of the built environment in the NPPF.
- 9.3 Paragraph 126 of the NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 9.4 Paragraph 130 of the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, which will function well over the lifetime of the development, are visually attractive, sympathetic to local character, establish a strong sense of place, optimise the potential of the site, and create places that are safe.
- 9.5 The National Design Guide, and the National Model Design Code and Guidance Notes for Design Codes illustrate how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.
- Context – enhances the surroundings;
 - Identity – attractive and distinctive;
 - Built Form – a coherent pattern of development;
 - Movement – accessible and easy to move around;

- Nature – enhanced and optimised;
- Public Spaces – safe, social and inclusive;
- Uses – mixed and integrated;
- Homes and Buildings – functional, healthy and sustainable;
- Resources – efficient and resilient; and
- Lifespan – made to last.

9.6 London Plan policy D2 states that the density of development should be proportionate to the Site’s connectivity and access to public transport.

9.7 Policy D3 sets out that all development must make the best use of land and use a design led approach to optimise the capacity of sites. Part B of Policy D3 states that development proposals should have regard to form and layout, experience and respond to the quality and character of the surroundings.

9.8 Policy D4 states that the design of development proposals should be thoroughly scrutinised. The scrutiny of a proposed development’s design should cover its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping. The design and access statement should explain the approach taken to these design issue

9.9 Policy D5 requires development proposals to achieve the highest standards of accessible and inclusive design.

9.10 At a local level, Camden Local Plan Policy D1 seeks to secure high quality design in development and to ensure that new developments are attractive, safe and easy to use as well as inclusive and accessible for all.

9.11 Local Plan Policy D2 states that the Council will preserve and where appropriate enhance Camden's heritage assets and their settings. This includes a general presumption in favour

of retaining buildings that make a positive contribution to the character and appearance of the conservation area.

9.12 Camden Local Plan Policy C6 seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. The Council will expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all. The Council will seek to ensure that development meets the principles of lifetime neighbourhoods.

9.13 Camden has also published a Design Camden Planning Guidance document which highlights LBCs commitment to excellence in design and what schemes should consider:

- The context of a development and its surrounding area;
- The design of the building itself;
- The use and function of buildings;
- Using good quality sustainable materials;
- Creating well connected public spaces and good quality public realm;
- Opportunities for promoting health and well-being; and
- Opportunities for improving the character and quality of an area.

9.14 The Access for All Camden Planning Guidance documents sets out LBC's expectation that all development of buildings and places, including changes of use and alterations or refurbishment of existing buildings, to be inclusively designed and useable by all the promote equality of opportunity.

Assessment

West Yard

9.15 The Proposed Development includes new industrial style shopfronts within West Yard and a new retail pavilion building which would be located on the site of the old storage/kitchen

block. These have been designed to complement the industrial heritage of the area and are proposed to be black in colour with bi- folding doors and black painted frames.

- 9.16 The design of the observation wheel, which has an industrial appearance, has evolved following pre application advice. The proposal seeks to keep the existing canal basin open and the base of the observation wheel now provides less intrusive foundations and provides for clearer pedestrian circulation around the base.
- 9.17 The observation wheel is proposed on the western side of the basin and four spokes would support the wheel at ground level. One spoke would be located on the other side of the basin to provide stability. Raised decking is proposed around the base of the wheel to provide a gradual level change which would enable step free ramped access.
- 9.18 The observation wheel includes 15 enclosed gondolas which could each accommodate 12 people. The gondolas would be enclosed and are envisaged to include a unique audio experience featuring the soundscape of famous musicians. This audio experience would not be heard externally.
- 9.19 Following the removal of the temporary observation wheel after five years of operation, the area will be reinstated to provide hard landscaped surfaces, this will result in level access across the West Yard.
- 9.20 The existing West Yard area is difficult to navigate as there is no level access. The proposal seeks to provide new decking and a temporary bridge across the basin to allow for improved circulation around the West Yard. All entrances and connections into the East Vaults would be via ramped access and level gradients to maximise level access.
- 9.21 The temporary bridge, measuring approximately 7.5m in length and 2.8m in width, has been designed in accordance with pre application advice to complement the Conservation Area. The black metalwork and void below the bridge structure will allow visitors to appreciate the canal basin. The temporary bridge would be fixed to the existing jetty structure which would ensure that the existing granite setts would not be damaged around the perimeter of the basin. The bridge would be removed at the same time as the

temporary observation wheel. The Reinstatement Strategy provides further details on how the granite setts would be protected.

East Vaults and Dead Dog Basin

9.22 The enhancements to the East Vaults and Dead Dog Basin have been sensitively designed to preserve the designated heritage assets. The proposal includes a new East Vaults entrance from Camden Lock Place into the educational/cultural and exhibition space.

9.23 The proposal seeks to remove the white paint from the internal wells to expose the masonry; retain and refurbish the existing steel structure and paint the steel in a black fire retardant paint; clean the historic fire doors and mechanical hoists and retain the high level timber decks within Dead Dog basin.

9.24 In respect of Dead Dog Basin, a new jetty is proposed comprising a steel cantilever structure with beams placed centrally between the new access openings from East Vaults. This jetty would allow the public to enter Dead Dog Basin and use the Water bus.

9.25 The proposal includes ten new openings between East Vaults and Dead Dog basin to provide access into the basin, fresh air ventilation and a new waste access area for the iRecycle barges.

9.26 The proposals meet National, Regional and Local policies in terms of making best use of land; providing a design response which enhances the heritage assets and providing an increased permeability and accessibility across the site.

10 Heritage, Archaeology, Townscape and Views

- 10.1 This section considers the Proposed Development against relevant National, Regional and Local heritage planning policy and guidance relating to designated heritage assets, archaeology and townscape.
- 10.2 This section also considers the Proposed Development in respect of townscape views and impact heritage assets, notably the setting of one the Grade II Listed Interchange Building, the Grade II Listed roving bridge and a number of Grade II Listed Buildings immediately surrounding the site as well as a number of Conservation Areas, Listed Buildings and Locally Listed Buildings within 500m of the Site.
- 10.3 A full analysis of the impact of the proposed development on designated heritage assets is included within the Built Heritage Statement and Townscape Visual Impact Assessment (TVIA) prepared by Turley Heritage and submitted as part of the planning application. These supporting documents should be read alongside the following section of this Statement.
- 10.4 Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall 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.
- 10.5 Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of Conservation Areas.
- 10.6 The Government has attached great importance to conserving and enhancing the historic environment at Chapter 16 of the NPPF.
- 10.7 Paragraph 194 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be

proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

- 10.8 As a minimum, the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 10.9 Paragraph 197 of the NPPF states that in determining planning applications, local planning authorities should take account of:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.
- 10.10 Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 10.11 Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 10.12 The NPPG on Conserving and Enhancing the Historic Environment provides further guidance in assessing the impact of development proposals which effect heritage assets. It sets out that “significance” derives not only from a heritage asset’s physical presence, but also from its setting. It sets out that “Public Benefits” may follow from many

developments and could be anything that delivers economic, social or environmental objectives as described at paragraph 8 of the NPPF.

- 10.13 London Plan Policy HC1 states that development should identify, understand, conserve, and enhance the historic environment and heritage assets, and improve access to, and interpretation of, the heritage assets, landscapes and archaeology within their area. Development which affects heritage assets should conserve their significance by being sympathetic to their form, scale, materials and architectural detail. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

- 10.14 London Plan Policy HC4 refers to the London View Management Framework 2012 and states that development proposals in the background of a view should give context to landmarks and should not harm the composition of the view as a whole.

- 10.15 Camden Local Plan Policy D1 seeks to secure high quality design in development.

- 10.16 Policy D2 of the Local Plan states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings. In respect of designated heritage assets, the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage assets unless the public benefits of the proposal convincingly outweigh that harm.

- 10.17 In respect of archaeology, Local Plan Policy states that the Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

Assessment

- 10.18 In terms of significance, the Site is located within the Regents Canal Conservation Area and comprises a range of 19th and 20th Century buildings. The Interchange Building is a well-preserved example of a late Victorian commercial warehouse. It includes remnants

of machinery dating back to its original use. The Roving Bridge over the Regents Canal is Grade II Listed, was constructed in the early 19th Century and is elegant in form.

- 10.19 The Proposed Development would facilitate public access to these parts of the listed building for the first time and, as such, better reveal the heritage significance of the listed building. A new access point from the West Yard to the East Vaults would increase permeability and facilitate greater pedestrian circulation. A refreshed gateway and entrance into the Interchange Building at the end of Camden Lock Place also provides a high-quality improvement to the existing service entrance and will have a positive effect on the appearance of the Regent’s Canal Conservation Area.
- 10.20 The Proposed Development facilitates access to Dead Dog Basin, with access for public onto canal boats and via the canal on the London Waterbus. The Proposed Development includes a new opening to facilitate access from the East Vaults to the basin. These would be small and simple detailed, maintaining an appreciation of the spatial qualities and volume of the enclosed basin; the legibility of the wall plane; and distinction between basin and the vaults
- 10.21 The inventions have been designed to be sympathetic in nature and are a public benefit as the Proposed Development would help to secure a new use which enables the conservation and improvement of this unused space.
- 10.22 In respect of the observation wheel, it would be temporary in nature for five years. The wheel would be removed in its entirety and a Reinstatement Strategy has been submitted in support of this planning application. The wheel would be seen from a number of key local views. However, this would be temporary, and the Proposed Development would provide a range of public benefits including a free educational exhibition space, the opening up of the East Vaults and Dead Dog Basin for the first time to the general public, new job and training opportunities and flexible market and events space which would cater for locals, families, Londoners and tourists. It is therefore considered that the observation wheel would cause less than substantial harm for the duration of its operation.

- 10.23 A temporary bridge is proposed to span the opening from the basin to the Regent's Canal during the operation of the observation wheel to maintain pedestrian movement around this part of Camden Market. This temporary bridge would form part of a wider area of replacement decking that maintains the existing decking footprint. Following pre-application advice from Historic England, the bridge has been redesigned to be lightweight in nature to allow the basin opening to remain legible.
- 10.24 The archaeology report prepared by MOLA and submitted with the planning application, advises that the Grade II Listed Interchange Building and basin has high potential for buried foundations of earlier 19th century buildings in this location (wharf-side buildings and earlier interchange buildings) and 19th century industrial infrastructure such as railway tracks (or the beds on which they were laid), the base of hoists etc. Buried fabric of the listed structures within the Interchange complex is likely to be of high significance. Other remains would be of low or medium significance depending on their nature, state of survival and extent.
- 10.25 The West Yard has high potential for buried remains of the mid 19th century extension to the middle dock (now infilled), 19th century industrial infrastructure such as railway track (or the beds on which they were laid) and the foundation remains of earlier 19th century buildings shown on historic maps. Surviving buried elements of the middle docks are likely to be of medium significance, depending on their state of survival and extent. Other remains are likely to be of low or medium significance depending on their nature, state of survival and extent.
- 10.26 The report advises that the proposed piled foundations for the observation wheel and the foundations of the Jetty will remove all surviving archaeological remains (i.e. 19th century foundations) within their footprint. The report recommends that archaeological evaluation pits are undertaken to determine the presence, nature and significance of any archaeological remains in the areas of proposed impact.
- 10.27 Following pre-application discussions with key stakeholders, the detailed design has identified measures to minimise and mitigate perceived heritage impacts, including:

- a) Use of a high-quality design, which refers to the industrial heritage of the area including exposed structural elements;
 - b) Limited material and colour pallet, taking cues from the local character;
 - c) Maintaining visibility of the canal basin as an open, water-filled feature and historic surfacing surrounding the Site;
 - d) Minimising the prominence and visibility of any service structures, services, and associated structures;
 - e) Retention of historic fabric that contributes positively to the significance of the relevant built heritage assets; and
 - f) Retention of the Weeping Willow in the south eastern corner of the Yard.
- 10.28 The Built Heritage Statement prepared by Turley Heritage advises that the temporary nature of the observation wheel means that the impacts on heritage significance would be for a limited duration and is reversible. The dense urban townscape in this location means visibility of the observation wheel will be contained locally, with partial longer-range views being less susceptible to change in relative terms.
- 10.29 The design takes into consideration the prevailing aesthetic of historic industrial buildings, celebrating the structure and engineering of the observation wheel in a manner consistent with heroic Victorian engineering associated with canals and railways. This considered design will help to visually integrate the observation wheel within the existing West Yard.
- 10.30 The Built Heritage Statement identifies that the observation wheel would cause temporary harm to the character and/or 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 listed buildings. That said, the harm caused to the significance of those identified designated heritage assets by the temporary

observation wheel would be less than substantial for the purposes of the NPPF; ranging from the middle to the lower end of the 'spectrum of harm' envisaged by the NPPF.

- 10.31 As set out in paragraph 201 of the NPPF, any such harm should be weighed against the "public benefits" of the proposals. The observation wheel is an integral element of the Proposed Development (and wider phased development of Camden Market), which includes a package of extensive, permanent, and enduring public benefits. The temporary less than substantial harm that has been identified must be given great weight and importance, to be considered against those public benefits in the overall planning balance.
- 10.32 The Proposed Development delivers significant heritage benefits associated with a viable use and public access to the listed building, allowing new appreciation and understanding of the building's particular significance, including its function; structure and historic connections to the canal.
- 10.33 A Townscape and Visual Impact Assessment (TVIA), prepared by Turley Townscape, identifies that the Site contains features characteristic of Camden Market including fine examples of industrial brickwork, granite setts, York slabs and structural steelwork, but does not optimise the use of site with high accessibility.
- 10.34 The TVIA impacts concluded that the Proposed Development would result in a combination of adverse, beneficial, and neutral effects on townscape character due to the design of the temporary observation wheel and sensitive design approach to the East Vaults and Dead Dog Basin.
- 10.35 The assessment of visual effects identified that there would be 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 visually permeability.

- 10.36 The TVIA concludes that the use and appearance of the Proposed Development is appropriate for the Site and its local context and the high-quality design, including the reinstatement strategy for the West Yard, would result in long term, small to medium scale and tangible interventions within the Site and local townscape character. In particular, the design and black metal finish of the observation wheel would be in keeping with other metalwork present in views and would help to recede into the varied roofscape.
- 10.37 In addition, the TVIA concluded that the Proposed Development, specifically the observation wheel, would also have short term and reversible effect on key views from the surrounding area.
- 10.38 The Applicant is committed to continuing the heritage assets' recovery of the markets. The restoration works to the listed East Vaults for its opening to the public for the first time is detailed within the Listed Building Consent Schedule of Works, submitted with the planning application.
- 10.39 A Reinstatement Strategy has been prepared to explain the strategy for upgrading the West Yard space following the removal of the temporary observation wheel, bridge and temporary decking.
- 10.40 The temporary observation wheel would form part of a revamped West Yard for five years from its opening. As part of the Applicant's heritage recovery strategy, the Applicant's pledge is to restore the historic edges of the West Yard basin once the wheel has been removed after the temporary period.
- 10.41 The existing flooring covering the granite borders would be removed, exposing the original finish and the surface beyond levelled down to reveal the historic dock. The Applicant proposes a more pedestrian friendly circulation around West Yard by mitigating large level changes, material changes and making good the existing ground conditions to minimise level differences within the existing ground level finishes.
- 10.42 The result would be a fully cobbled hard landscaped area around the yard. The large historic basin perimeter cobbled stones would be retained. The non-historic pavers would

be removed and replaced with cobbled stones. The existing basin/canal wall would be repaired in collaboration with the Canal and River Trust. A new handrail around the basin and willow tree would be provided to accord with building regulations. The decking would be refurbished and any foundations arising from the wheel would be sensitively removed.

10.43 The removal of the observation wheel would include the dismantling of the wheel in the reverse process to its installation. The Middle Yard area would be required to be closed for approximately two weeks to enable this process. In addition, the access footbridge over Middle Yard would be removed and reinstated after the works.

10.44 In summary, the works to the East Vaults and Dead Dog Basin would secure permanent enhancements to the heritage assets and those works to the West Yard, including the installation of the observation wheel, would be reinstated to ensure maintenance and enhancements to these areas will be achieved. The observation wheel is an integral part of the development proposals as it would drive footfall into the area in a post pandemic world and the development would deliver a package of public benefits.

10.45 It is therefore considered that the proposal meets National, Regional and Local policies.

11 Energy and Sustainability

- 11.1 This section considers the Proposed Development against relevant planning policy regarding sustainability. A Sustainability Statement has been prepared by Arup and submitted as part of the planning application.
- 11.2 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- 11.3 The NPPF contains the Government's policy on climate change. Paragraph 20 of the NPPF encourages strategic polices to consider the conservation of the natural, built and historic environment including landscapes, green infrastructure and planning measures to address climate change mitigation and adaptation.
- 11.4 Paragraph 119 of the NPPF encourages development that makes as much use as possible of previously developed or 'brownfield' land.
- 11.5 NPPF Paragraph 152 sets out that planning policy should consider a low carbon future in a changing climate. Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.
- 11.6 Paragraph 149 states that local planning authorities are required to adopt proactive strategies to mitigate and adapt to climate change. Paragraph 150, states that to support the move to a low carbon future, local planning authorities should plan for new development in locations and ways that reduce greenhouse gas emissions; such as through suitable adaptation methods, location, orientation and design.
- 11.7 The London Plan sets out the Mayor's vision to ensure that London becomes a World leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, development a low carbon economy, consuming fewer resources and using them more effectively.

- 11.8 London Plan Policy GG6 considers how London can become a more efficient and resilient city. The policy highlights the needs for developments to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050, as well a need for developments to ensure buildings and infrastructure are designed to adapt to a changing climate.
- 11.9 London Plan Policy D3 states that developments should aim for high sustainability standards and take into account the principles of the circular economy.
- 11.10 As identified in London Plan Policy SI 2, major development should be net-zero carbon. This means reducing greenhouse gas emissions in operation and minimising energy demand in accordance with the following hierarchy:
- Be lean: use less energy and manage demand during operation
 - Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
 - Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
 - Be seen: monitor, verify and report on energy performance.
- 11.11 Part C of the London Plan Policy SI 2 sets out that a minimum on site reduction of 35% is required for major development, 10% of which should be achieved through energy efficiency measures for residential development and 15% for non-residential development. A carbon offsetting contribution will be sought for the remainder to make up the shortfall to net zero at a rate of £95 per tonne for 30 years.
- 11.12 London Plan Policy SI 4 states that development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- 11.13 Policy SI 7 of the London Plan focuses on reducing waste and supporting the circular economy. The Mayor seeks to achieve resource conservation, waste reduction, increases in material re-use and recycling and reductions in waste going for disposal.

- 11.14 At a local level, Local Plan Policy CC1 requires all development to minimise the effects of climate change and encourages developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Moreover, all development is required to reduce carbon dioxide emissions in line with the targets set out within the London Plan. The policy requires all proposals for substantial demolition to demonstrate that it is not possible to retain the existing building.
- 11.15 Policy CC2 of the Local Plan requires all development to be resilient to climate change through the adoption of appropriate climate change adaptation measures. Local Plan Policy C2 also promotes the incorporation of sustainable design and construction measures within development. Developments involving conversions of over 500sqm should achieve BREEAM “Excellent” for domestic and non-domestic buildings.
- 11.16 In January 2021, LBC published the Energy Efficiency and Adaptation CPG. The CPG has been prepared to support the policies of the London Plan (2021) and the Camden Local Plan (2017).
- 11.17 In 2020, LB Camden published the Camden Climate Action Plan (2020-2025) which sets out the Council’s ambition for a zero carbon Camden by 2030.

Energy

- 11.18 The Proposed Development seeks to refurbish the East Vaults as a publicly accessible exhibition space and open Dead Dog Basin to the public, refurbish the sui generis market and existing paving surrounding the West Yard and install a temporary observation wheel in the West Yard. The overall floorspace uplift of the Proposed Development would be 54 sqm (GIA).
- 11.19 An Energy Statement, prepared by GDM Partnership and submitted with the planning application, confirms that the Proposed Development will achieve a 57% improvement in the reduction of carbon emissions over the baseline model. This exceeds the Mayor’s target of more than 35% improvement in accordance with London Plan Policy SI 2 and Local Plan Policy S.2.

11.20 A summary of the individual carbon savings for the Be Lean, Be Clean, Be Green and Be Seen stages of the energy hierarchy are set out below.

Be Lean

11.21 The development will first and foremost seek to reduce its energy demand in line with five basic principles:

1. Continuous thermal insulation
2. Airtightness
3. Thermal bridge free
4. High-performance windows
5. Mechanical ventilation with heat recovery

11.22 These principles focus on achieving a continuous, well insulated envelope which is both airtight and thermal-bridge free.

11.23 Due to the Grade II Listed Interchange building within the site, the energy demand cannot be reduced by achieving a well-insulated envelope or a reduced airtightness and a thermal bridge free design. However, high performance glazing provides a positive energy balance whilst improving thermal comfort. Mechanical ventilation with heat recovery ensures a continual supply of fresh air with minimal heat loss.

11.24 The Proposed Development has been designed to minimise its use of energy intensive cooling systems through passive and energy efficient measures. To reduce the need for cooling and reduce the risk of overheating, the following measures have been taken in accordance with the GLA's Cooling Hierarchy:

- Minimising internal heat generation - Light Emitting Diode (LED) lighting will be used throughout the development to minimize internal heat gains;

- Reducing the amount of heat entering the building - The façade elements have been specified with a low solar transmission (g-value);
- Mixed Mode Cooling - Low energy mechanical ventilation, air conditioning; and
- Mechanical ventilation and active cooling systems - All fresh air will be delivered by AHUs in the gallery areas and have been sensitively designed in the listed building. Cooling will be provided by air source heat pumps.

11.25 The energy efficiency measures proposed for the redevelopment include:

- High performance glazing;
- High-performance LED lighting; and
- Highly efficient cooling and heat recovery ventilation systems.

A 9% carbon emissions reduction is achieved through energy efficiency measures ('Be Lean') for the development using the new SAP 10 emissions factors.

Be Clean

11.26 In relation to Be Clean, the options explored for Heating Infrastructure throughout the development were deemed to be unfeasible. The options explored are set out below.

11.27 The potential to include a Combined Heat and Power (CHP) was considered. For a CHP to be practical for a development there should be a steady demand for hot water and electricity. In addition to this, it is widely recognised that CHP is now more CO₂ intensive than electricity because of the rapid decarbonisation of the electricity grid. Therefore, CHP is not considered to be an appropriate technology for the Proposed Development. Furthermore, flue gases from the gas-fired CHP can lead to a reduction in local air quality.

11.28 Connecting to an existing district network has been investigated for the Site in accordance with Policy SI 3 of the London Plan. An analysis of the London Heat Map indicates that there are no existing or proposed district heating networks within 500m of the site, therefore connection to an existing network is not feasible.

11.29 The result of the findings is there is no carbon reduction proposed at the Be Clean stage of the energy hierarchy. However, it is noted that there is no policy requirement for a specific reduction at this stage.

Be Green

11.30 The following range of renewable energy systems have been fully explored, including Air Source Heat Pumps (ASHPs), Photovoltaics, Solar Water Heating, Wind Power and Biomass heating.

11.31 ASHPs are a viable option for the Proposed Development. The reasons for excluding other technologies have been set out in greater detail in the accompanying Energy Statement. These heat pump systems will enable significant emissions savings over a conventional gas boiler heating system, particularly when factoring in the decarbonisation of the electrical grid. The use of ASHPs is consistent with the principles of Policy SI 1.

11.32 With the inclusion of air source heat pumps a carbon reduction of 57% on regulated emissions has been calculated.

11.33 Camden Local Plan Policy CC1 requires for non-residential development a reduction of at least 20% from on-site renewable energy technologies beyond 2013 Buildings Regulations Part L standards. The development achieves a 48% emissions reduction, therefore, complies with the LBC's planning policy requirements.

Be Seen

11.34 The energy performance of the development will be monitored, verified and reported in line with the 'Be Seen' policy and relevant guidance document.

11.35 In summary, a 9% carbon emissions reduction is achieved through energy efficiency measures ('Be Lean') and the use of ASHPs for heating and cooling could reduce CO₂ emissions by 48% for the development over a conventional HVAC configuration ('Be Green'). Furthermore, the results indicate that the refurbishment is achieving a 57% improvement over the baseline model.

11.36 In addition, a preliminary-design stage Energy Performance Certificate (EPC) was generated for the development. The results predict that the design could achieve an asset rating of 44, which equates to a band 'B' EPC.

11.37 The Proposed Development therefore meets the London Plan target of minimum 35% reduction in CO2 emissions and is in accordance with the GLA's Energy Assessments Guidance October 2018 and complies with the Camden Local Plan Policy CC1 requirements.

Sustainability

11.38 A Sustainability Statement, which includes an overview of the BREEAM Strategy for the Proposed Development, and a Circular Economy Report have also been prepared Arup and address the relevant sustainability policies outlined in the London Plan (2021) and the Camden Local Plan (2017). The Sustainability Statement has been submitted as part of the planning application.

11.39 The Sustainability Statement has been developed around the following key themes which are outlined in the context of the Proposed Development below.

Environmental Assessment (BREEAM)

11.40 A BREEAM pre-assessment has been undertaken and a target rating of Excellent (70%) is deemed to be achievable with a target score of 71.15%. The Camden Local Plan (2017) requires a minimum percentage of credits to be achieved in the Energy, Materials and Water categories. The Sustainability Statement sets out that whilst Materials and Water categories are in excess of the LBC requirement however, the Energy category is slightly below. The full pre-assessment demonstrates that all energy credits are targeted in full except for Energy Performance (Ene 01), and Passive Design/Free Cooling (Ene 04). This demonstrates how the Proposed Development has considered Energy and acted in accordance with the energy hierarchy. Opportunities to deliver good energy performance in line with the energy hierarchy have been maximised. The Proposed Development does not include any major fabric renovations therefore, the achievable score for Energy

Performance (Ene 01) and the potential to achieve passive design/free cooling (Ene 04) are limited.

Design and Heritage

- 11.41 The Proposed Development seeks to provide an opportunity to open up the East Vaults and Dead Dog Basin to the general public and reveal the heritage of these structures to all. This aligns closely to the 6 key principles set out in Historic England’s Conservation Principles, Policies and Guidance. The Applicant is committed to preserving the heritage of the Site, promoting and creating awareness of it. The design process for the proposals has taken into consideration the access and inclusivity and safety and security for the Site, a number of documents have been submitted which support and detail how these considerations have been progressed and comply with policy.

Health and Wellbeing

- 11.42 The Proposed Development has been designed to continue to provide indoor and outdoor space for local residents and visitors which in turn, will maintain and enhance mental and physical wellbeing. Due to the small scale of the Proposed Development, a Health Impact Assessment has not been undertaken.

Biodiversity

- 11.43 The Proposed Development provides additional areas of landscaping, such as trees and herbaceous planting, including native species or species of benefit to wildlife, set at ground level or within raised planters. In addition, the intention as part of the Proposed Development is to select and plant a suitable replacement to the dead T1 False acacia which is currently on-site. Due to the scale of the Proposed Development, Urban Greening Factor calculations have not been undertaken.

Energy and Climate Change

- 11.44 In accordance with London Plan Policy SI 2, the proposals are minor development and as such, the ‘Energy Hierarchy’ has been followed as good practice. The design measures

proposed will provide regulated carbon savings of approximately 57% for the development when compared against the baseline model. Further information on energy and emission is provided at the beginning of this chapter. With respect to climate change mitigation and heat risk, consideration of the layout, orientation and external materials for the Proposed Development is not applicable due to the scope of refurbishment however, the impacts of overheating and climate change has been considered in the design of the space The proposed development has been designed to minimise its use of energy intensive cooling systems through passive and energy efficient measures. Two Life-Cycle Carbon Assessments have been prepared by Arup for the Proposed Development and submitted as part of the planning application. The assessment of refurbishment works concluded that:

- The embodied carbon emissions to practical completion to practical completion is approximately 377,070 kg CO₂e (175 kg CO₂e/m² GIA). This is significantly lower than any new build benchmarks; and
- The embodied carbon over the 660 years life cycle is approximately 783,455 CO₂e (360 kg CO₂e/m² GIA). This is significantly lower than any new build benchmarks.

11.45 The carbon values show that the refurbishment works are a low carbon alternative to new build. The existing building is being retained to preserve its current structure and enhance the services to make it suitable to extend the use and life cycle of the building. The assessment of the observation wheel concluded that:

- The embodied carbon footprint of the wheel at Practical Completion is approximately 470 tCO₂e. This is largely associated with the steel frame;
- The embodied carbon over its Life Cycle is approximately 695 tCO₂e. The uplift from Practical Completion is mostly associated with the painting of the steel frame during its service life; and
- The wheel is to be in service for 5 years in Camden Lock Market and would then be leased or sold to a new owner in its entirety.

Water and Flooding

11.46 The site is located within Flood Zone 1 according to the Environment Agency Flood Map for Planning. As such, a Flood Risk Assessment has not been undertaken.

Waste, Materials and Circular Economy

11.47 The operations of the development will target a minimum of 75% municipal waste recycling and target no biodegradable or recyclable waste sent to landfill. Furthermore, it is proposed that waste removal from the Site will take place via barge, through the operator iRecycle, to make use of the water connection. As part of the detailed design stage, a pre-demolition audit has been prepared and submitted as part of the planning application by Arup. This identifies the measures that will be taken to minimise demolition waste and promote reuse and recycling in accordance with the waste hierarchy.

11.48 A Detailed Circular Economy Statement has been submitted in support of the application in accordance with London Plan Policy SI 7. This demonstrates how circular economy principles have been considered from the project outset. The following Circular Economy targets and commitments have been formulated:

- To specify a total of 20% recycled content by value for new materials;
- 95% diversion of waste from landfill (Construction);
- 95% diversion of waste from landfill (Demolition and Excavation);
- 75% diversion of waste from landfill (Operational) with no biodegradable waste sent to landfill; and
- <3.5t/100m² GIA non-hazardous construction waste.

11.49 Further details on Waste and Circular Economy can be found in the Delivery and Servicing Management Plan and the Detailed Circular Economy Statement prepared by Arup and submitted in support of the planning application.

Transport

- 11.50 The existing site is car free with no provision of car parking and the Proposed Development will maintain this approach with no additional parking proposed as part of the works and solely the provision of 26 new short stay spaces.
- 11.51 The Proposed Development seeks to improve the accessibility in the West Yard and for users of the Canal towpath through the provision of a new temporary footbridge across Dingwall Dock seeks to improve east/west connections.
- 11.52 Two new access routes are proposed from West Yard into the East Vaults. The first is the southern entrance which will provide a secondary fire escape, and access to WC's and back-of-house facilities such as the plant rooms and refuse/recycling facilities. The second will be the northern entrance which will act as the primary entrance point into the exhibition space and provides permeability across the Site from West Yard, through to the East Vaults and Dead Dog Basin.
- 11.53 Further details on transport matters can be found in the Transport Assessment and appended Interim Travel Plan and in the Delivery and Servicing Management Plan prepared by Arup.
- 11.54 Furthermore, during the construction phase of development, inclusive and safe access for people walking or cycling will be prioritised. The Construction Management Plan, prepared by Arup, should be read as an evolving document which would be updated as and when further information is provided on pre-construction stages and on the timetable for works.

12 Transport, Servicing and Waste

- 12.1 Chapter 9 of the NPPF sets out the Government’s policies with regards to transport. The overall aims are to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion and will contribute to wider sustainability and health objectives. The NPPF outlines aims for a transport system balanced in favour of sustainable transport modes, in order to give people a real choice about how they travel. It also encourages solutions which support reductions in greenhouse gas emissions and reduce congestion. Paragraph 110 of the NPPF states it should be ensured that:
- i. appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - ii. safe and suitable access to the site can be achieved for all users;
 - iii. the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
 - iv. any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 12.2 Paragraph 105 of the NPPF states that the planning system should actively manage patterns of growth in support of sustainable transport objectives.
- 12.3 Paragraph 111 of the NPPF is clear that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 12.4 At a regional level, one of the strategic objectives of the London Plan is to improve accessibility, making London an easier city to move around and making public transport and the pedestrian environment accessible to everyone. The Mayor’s Transport Strategy sets out policies and proposals to achieve the goals set out in the Plan.

- 12.5 London Plan Policy T1 ‘Strategic approach to transport’ examines the integration of transport and development, outlines that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated.
- 12.6 London Plan Policy T1 also states that developments should facilitate the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.
- 12.7 London Plan Policy T2 advises that development proposals should promote and demonstrate the application of the Mayor’s Healthy Streets Approach to: improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities.
- 12.8 London Plan Policy T3 states that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.
- 12.9 London Plan Policy T4 sets out that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.
- 12.10 Policy T4 Part A of the London Plan sets out that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. Part F of Policy T4 states that development proposals should not increase road danger.
- 12.11 Policy T5 and Table 10.2 of the London Plan sets out minimum cycle parking standards for new developments.
- 12.12 Policy T5 of the London Plan states that cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards.

- 12.13 Camden Local Plan Policy T1 seeks to promote sustainable transport by prioritising walking, cycling and public transport in Camden by supporting public realm improvements and the pedestrian environment, promoting cycling and providing high quality parking and end of trip facilities in developments.
- 12.14 Camden Local Plan Policy T1 outlines that in order to safeguard and promote the provision of public transport in the borough, the Council will seek to ensure that development contributes towards improvements to bus network infrastructure. Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major developments where appropriate.
- 12.15 Camden Local Plan Policy T1 sets out that where appropriate, development will also be required to provide for interchanging between different modes of transport including facilities to make interchange easy and convenient for all users and maintain passenger comfort.
- 12.16 Camden Local Plan Policy T1 seeks to promote walking in the borough and improve the pedestrian environment. The Council will ensure that developments:
- a. Improve the pedestrian environment by supporting high quality public realm improvement works;
 - b. Make improvement works to the pedestrian environment including the provision of high quality safe road crossings where needed, seating, signage and landscaping;
 - c. Are easy and safe to walk through ('permeable');
 - d. Are adequately lit;
 - e. Provide high quality footpaths and pavements that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users where appropriate; and
 - f. Contribute towards bridges and water crossings where appropriate.

- 12.17 The Council promotes cycling in the borough and wishes to ensure a safe and accessible environment for cyclists. Camden Local Plan Policy T1 sets out that the Council will seek to ensure that development:
- a. Provides for and makes contributions towards connected, high quality, convenient and safe cycle routes, in line or exceeding London Cycle Design Standards, including the implementation of the Central London Grid, Quietways Network, Cycle Super Highways and;
 - b. Provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan and design requirements outlined within the Council's CPG on transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development;
 - c. Makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers;
 - d. Is easy and safe to cycle through ('permeable'); and
 - e. Contribute towards bridges and water crossings suitable for cycle use where appropriate.
- 12.18 Policy T2 of the Local Plan states that the Council will require new developments in the borough to be car free and will not issue on-street or on-site parking permits in connection with new development. In addition, on-site parking will be limited to spaces designated for disabled people and/or essential operational or servicing needs.
- 12.19 Policy T3 of the Camden Local Plan seeks to ensure improvements are made to transport infrastructure in the borough, the Council will not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure improvements projects and protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport, from removal or severance.
- 12.20 When required, in accordance with national or local guidance, Camden Local Plan Policy T4 states that transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network at the local,

network-wide and strategic level, are fully assessed. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.

- 12.21 Camden's Transport CPG, published March 2019, provides information on the application of Camden's transport policies, including all types of detailed transport issues including assessing transport impact, travel plans, delivery and servicing plans and cycling facilities.
- 12.22 The Transport CPG sets out a key message that all developments must have due regard to the safety, ease of movement and the quality of pedestrian and cycle facilities for people moving to and within a site.
- 12.23 The Transport CPG states that the Council will seek high quality cycle parking facilities for development, including redevelopments and in applications that change travel patterns and the travel profile or increase the numbers of people travelling to a site. Applicants must provide, as a minimum, the quantity of cycle parking set out in the London Plan and applicants will provide cycling facilities that are fully inclusive and accessible by step free access.
- 12.24 The Camden Transport Strategy 2019-2041 states the visions and objectives for transport in the Borough, in order to help people to travel more sustainably and live healthier lives, whilst reducing pollution and improving air quality.

Assessment

- 12.25 A Transport Assessment (TA) has been prepared by Arup and is submitted in support of the planning application. Arup has also produced a Framework Travel Plan (FTP) which is appended to the TA and a Construction Management Plan which has also been submitted alongside the planning application.
- 12.26 The Site currently benefits from a range of public transport nodes nearby and has a PTAL of 6a, indicating public transport accessibility and the second highest possible scoring on the PTAL grading.

- 12.27 The Proposed Development includes a floorspace uplift of 54 sqm. The scheme proposes a user-centric approach which primarily responds to the needs of prospective employees and visitors to the Site in accordance with TfL's Healthy Streets approach. The proposals promote and enhance active travel modes by creating a new layout which improves permeability and connectivity of the Site.
- 12.28 The Site is proposed to remain car-free, with no general vehicular access afforded with the exception of emergency vehicles.
- 12.29 With regards to travel demand associated with Proposed Development, the trip forecast methodology has been agreed with TfL during the pre-application discussions.
- 12.30 The trip generation exercise set out within the TA follows a first principles net change approach for forecast additional activity attracted by the proposals. The additional activity is forecast only for the observation wheel and visitors to the gallery. The other uses on-site do not change significantly from existing and therefore activity is expected to remain comparable also.
- 12.31 Baseline surveys were collected in 2015 as part of a previous planning application for the Site and included mode share information. The 2015 TA established a principle in which 20% proportion of the total number of additional trips generated would be new trips, while the remaining 80% are linked trips by visitors to the existing market and surrounding facilities. This assumption is maintained for this TA also.
- 12.32 Trip rates have not been used to calculate the people flow for the Proposed Development due to the nature of the observation wheel and the absolute numbers – limited by capacity – the wheel can accommodate. This is informed by the People Movement Strategy which is appended to the TA.
- 12.33 The increase in public transport usage is negligible, with only 115 new trips in the peak hour associated with the development using the Tube, only 32 using the bus network, and only 16 on the train network, for both weekdays and weekends. Due to the differences in the distribution of people coming to the area, on weekdays the total number of the tube

network is 461, on buses – 129, and on the train network – 64; whereas on the weekends it is 948, 265 and 133 passengers respectively.

- 12.34 The net number of trips will also generate walking trips to and from public transport connections. In summary, it can be seen that the development attracts an additional 200 walking trips to the Site during the weekday lunchtime peak hour, of which 37 are walking only, and the remainder linked to public transport. On the weekend, the market is busier, however, the peak hour new trips are limited by the capacity of the observation wheel. Therefore, the observation wheel would still only attract an additional 200 walking trips, of which 37 are walking only and the rest associated with public transport links.
- 12.35 In line with the above net change, the development is proposed to be car-free. Disabled parking bays would be accessible via a step-free route in proximity to the Site.
- 12.36 Furthermore, the Proposed Development will provide a total of 26 short stay spaces in the form of London stands which would be situated at the base of the observation wheel. Long stay spaces are not proposed due to the minor uplift in floor area.
- 12.37 In parallel to the TA, People Movement studies have been undertaken to ascertain the impact of the proposed observation wheel into the West Yard. It is proposed that the space within West Yard will support both circulation and dwelling, with queuing for the Observation Wheel also included.
- 12.38 The current layout of the West Yard creates indirect circulation routes and limits opportunities for dwelling without impacting circulation. As part of the Proposed Development, the space in West Yard will be rationalised with the removal of market stalls in circulation areas. It is anticipated that the West Yard will support the following activities following the introduction of the observation wheel:
- Circulation and access to units surrounding West Yard;
 - Circulation between different parts of the market, including access between the ticket office and Observation Wheel;
 - Access/queuing for temporary Observation Wheel;
 - Dwelling/ eating and drinking; and

- Through pedestrian movements travelling along the canal path.

- 12.39 The observation wheel occupies a similar amount of space to the total space allocated to the market stalls in the current layout, but as this is consolidated to one area, there are increased opportunities for dwelling without obstructing circulation routes.
- 12.40 The People Movement studies demonstrate that the Proposed Development has a higher capacity potential when compared to the current layout with the space providing up to 900 people when compared to 420 in the current layout.
- 12.41 The studies also demonstrate that when the density in the dwelling area increases, it is likely that people will spread out and move into the circulation routes creating obstructions. The dwelling population that can be supported without causing obstruction to circulation flows is higher in the proposed layout as a result of the unobstructed spaces provided.
- 12.42 Further to the above, the Proposed Development also includes a new temporary footbridge across the southern extent of Dingwall's Dock, which measures approximately 7.5m in length and 2.8m wide and seeks to provide better connectivity through the area.
- 12.43 A FTP is provided in the appendix of the TA and has been prepared in accordance with TfL's latest Travel Plan Guidance. The FTP is a continuously evolving document that will be regularly monitored and reviewed to ensure support for targets and objectives set out allow the Travel Plan to be refined and adapted.

Delivery, Servicing and Waste

- 12.44 London Plan Policy SI 7 seeks to achieve resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal.
- 12.45 Policy SI 7 clarifies that referable applications should promote circular economy outcomes and aim to be net zero-waste. As such, a Circular Economy Statement should be submitted.

- 12.46 London Plan Policy T7 sets out that “development proposals should facilitate sustainable freight movement by rail, waterways and road. Development proposals should facilitate safe, clean and efficient deliveries and servicing. The provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible”.
- 12.47 As required in London Plan Policy T7, Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.
- 12.48 Camden Local Plan Policy CC5 seeks to make Camden a low waste borough. The Council will ensure that developments include facilities for the storage and collection of waste and recycling.
- 12.49 Camden Local Plan Policy T4 sets out that the Council will “promote the sustainable movement of goods and materials and seek to minimise the movement of goods and materials by road and will encourage the movement of goods and materials by canal, rail and bicycle where possible”.

Assessment

- 12.50 A Delivery and Servicing Management Plan (DSMP) has been prepared by Arup and submitted with the planning application. The DSMP includes the Waste Management Plan (WMP) for the Proposed Development.
- 12.51 The DSMP sets out the objectives and explains that an on-going monitoring and review of the document will be required to ensure that the objectives are achieved. If necessary, the DSMP will be reviewed and adapted to reflect continuous improvement of the delivery and servicing process.
- 12.52 Most delivery and servicing trips to the market are currently made by Light Goods Vehicles (small vans and transit vans), with the remainder of the deliveries by Medium Goods

Vehicles and Heavy Goods Vehicles. Some deliveries and collections are made by cycle and motorcycle couriers.

12.53 The DSMP outlines the estimated daily delivery and servicing trips to the site. These have been calculated using an Arup in-house vehicle generation tool developed to utilise Arup research and other survey information from similar developments in the United Kingdom. The following assumptions have been made:

- Trip rate for retail market stalls and ticket office is 0.77 vehicles/100m² GIA/day
- Trip rate for the exhibition space and flexible space is 0.20 vehicles/100m² GIA/day
- Plant, storage, refuse, WC's and circulation do not generate trips

12.54 The Proposed Development is an adjustment to the existing use of the space. It is therefore anticipated that the delivery and servicing trips for the Proposed Development will be closely comparable to the delivery and servicing trips for the existing market and will not vastly differ from the current delivery operations.

12.55 Delivery vehicles will continue to use Camden Lock Place until 9:30am each day. Between 9:30am and 6pm all remaining deliveries take place using two on-street loading bays located south of the development on Camden High Street and north of the development on Chalk Farm Road. During the day, delivery vehicles will use the on-street loading bays located on Camden High Street. This aligns with the current strategy for delivery and servicing vehicles.

12.56 Survey data from Camden Lock Place indicates that between 5am and 9.30am there are 12 delivery vehicle arrivals, which is approximately 3 per hour. The adjustment in the use of space is assumed to generate no additional deliveries to the current. These deliveries can be accommodated in the three existing loading areas.

12.57 In relation to waste, retailers and market tenants move their own waste into the centralised waste store throughout the day and evening. The waste quantities currently generated through the waste operation is set out in the WMP.

12.58 The proposed changes to the market through the redevelopment are likely to create an increase in the amount of waste generated. Following discussions with the iRecycle team

it is estimated that the waste quantities could increase by up to 30%. iRecycle was conceived in 2018 using barges to transfer large quantities of commercial waste along the Regents & Grand Union canal before it is treated for recycling & waste to energy.

- 12.59 Sustainability is at the heart of the Applicant's agenda, and they have worked alongside the Design Team with the market's long-term provider iRecycle to enable the new facilities to service waste from the markets efficiently, including Stables Market and Buck Street Market. Road collection can be difficult to manage due to space constraints and congestion. Barges reduce this pressure and allows the Site to make use of the water connection. Waste from any refuse bins located around the market will be collected by the Facilities Management team and transferred to the waste store. The proposed waste streams, amounts, storage and processing methods and collection frequencies are set out in detail in the WMP included within the DSMP.
- 12.60 The design of the Proposed Development has allowed for a suitable storage space for waste segregation. The operations of the development will target a minimum of 75% municipal waste recycling and target no biodegradable or recycle waste sent to landfill.
- 12.61 Construction, demolition and excavation waste targets have been set in accordance with BREEAM. These include the waste minimum of 95% diversion from landfill and a construction waste generation of <3.5t/100m² GIA.
- 12.62 The Proposed Development therefore accords with London Plan Policy SI 7, London Plan Policy T7 and Local Plan Policy CC5 and T4.

13 Other Technical Considerations

Noise

- 13.1 The NPPF contains guidance on noise management in planning decisions. Paragraph 180 states that decisions should aim to avoid noise giving rise to significant impacts on quality of life as a result of development and mitigate noise impacts.
- 13.2 Paragraph 185 of the NPPF states that decisions should aim to avoid noise giving rise to significant impacts on quality of life as a result of development and mitigate noise impacts. This paragraph contains recognition that development will often create some noise.
- 13.3 London Plan Policy D13 states the “Agent of Change” principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development.
- 13.4 London Plan Policy D14 states that development proposals should manage noise by:
- avoiding significant adverse noise impacts on health and life;
 - reflecting Agent of Change principle;
 - mitigating and minimising the existing and potential adverse impacts of noise without placing unreasonable restrictions on existing noise-generating uses;
 - improving and enhancing the acoustic environment and promoting appropriate soundscapes; and
 - promoting new technologies and improved practices to reduce noise at source.
- 13.5 At a local level, Local Plan Policy A1 seeks to manage the impact of development. The policy states that the Council will:
- a) Seek to ensure that the amenity of communities, occupiers and neighbours is protected
 - b) Seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities

- c) Resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and
- d) Require mitigation measures where necessary.

13.6 Camden Local Plan Policy A4 seeks to ensure that noise and vibration from development is controlled and managed. Planning permission will only be granted for noise generating development where it can be operated without causing harm to amenity. Camden also seeks to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development through this policy.

13.7 Camden Local Plan Policy A4 seeks to ensure that noise and vibration from development is controlled and managed. Planning permission will only be granted for noise generating development where it can be operated without causing harm to amenity. Camden also seeks to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development through this policy.

Assessment

13.8 A Noise Impact Assessment has been prepared GDM (on behalf of KP Acoustics) and submitted with the planning application.

13.9 The Site comprises a number of industrial and commercial buildings of varying sizes and ages. The market contains a mix of permanent units and stalls uses flexibly within Use Class E and sui generis. The site is bounded by office buildings and a car park to the north, office building to the west, ancillary buildings to the south, and Camden Lock Market to the west.

13.10 The Proposed Development will include the installation of one plant unit. The proposed installation location for the unit will be on a platform above a newly built entrance. The highest Noise Emission Level of the proposed plant installation unit would be 64 dBA.

13.11 The Manufacturers noise data of the proposed plant unit has been used to obtain specific and rated noise level at the nearest sensitive receiver. The rating level was compared with

the representative background noise level to assess the likelihood of impact considering the environmental noise context of the area.

- 13.12 It should be noted that the proposal does not include amplified music. The music within the observation wheel gondolas would be contained within the sealed pod.
- 13.13 The closest noise sensitive receiver to the proposed installation location has been identified as being an office window of the neighbouring Associated Press building owned by the Applicant. This is located approximately 10m from the proposed plant installation location.
- 13.14 It is concluded within the Noise Impact Assessment that noise emission from the proposed plant unit would not have an adverse impact on the nearest office use without the requirement for any further noise control strategy.
- 13.15 As such, the Proposed Development accords with London Plan Policy D13 and D14 and Local Plan Policy A1 and A4.

Air Quality

- 13.16 At a national level, NPPF paragraph 185 advises that planning decisions should ensure that development is located appropriately. Development proposals should consider the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from development. In pursuance of this development proposals should mitigate and reduce to minimum potential adverse impacts in amenity.
- 13.17 Paragraph 174 of the NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution
- 13.18 London Plan Policy SI 2 Minimising greenhouse gas emissions requires major developments are net zero-carbon, through reducing greenhouse gas emissions during

operation through being lean, clean and green. Major proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met.

- 13.19 At a local level, Local Plan Policy CC4 requires development to provide air quality assessments where the proposed scheme is likely to expose residents to high levels of air pollution.
- 13.20 The Air Quality CPG was published by LBC in January 2021 and states that Camden is a designated Air Quality Management Area due to the high concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀). As such, all developments are to limit their impact on local air quality. An Air Quality Assessment is required to support any scheme which proposes uses susceptible to poor air quality, such as housing.
- 13.21 The Air Quality CPG prepared by LBC outlines that the Council's overarching aim is for new development to be 'air quality neutral', not lead to further deterioration of existing poor air quality and, where possible, to improve local air quality ('air quality positive'). The demolition and construction phases of development on air quality must be taken into account as part of planning applications. Mitigation and offsetting measures to deal with any negative air quality impacts associated with development must be implemented.

Assessment

- 13.22 An Air Quality Assessment has been prepared by Waterman Infrastructure & Environment Limited which seeks to assess the potential effect of the Proposed Development on local air quality during construction and to qualitatively consider the potential air quality concentrations future users of the Proposed Development would be exposed too. The Air Quality Assessment has been submitted with the planning application.
- 13.23 The Site is in an Air Quality Management Area (AQMA) for exceedances of the 1-hour and 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).

- 13.24 Dust effects during the construction phase has been carried out using the IAQM guidance. The implementation of a range of appropriate site management practices to control dust emissions would significantly reduce the potential for adverse nuisance dust effects associated with the various stages of the works. It is considered that likely residual effects due to fugitive emissions would be not significant. Additionally, the effect of construction vehicles entering and egressing the Site during the construction phase would be not significant.
- 13.25 The TA submitted alongside this planning application confirms the trips generated by the Proposed Development would not result in a change of more than 100 LDVs or 25 HDVs and would therefore be below the EPUK and IAQM guidance criteria for when an air quality assessment is required. Additionally, the Proposed Development would not include a centralised combustion plant and would therefore, not give rise to any significant adverse air quality impacts.
- 13.26 Based on the low trip generation and the absence of a centralised combustion plant, according to the EPUK/IAQM guidance, the Development is not expected to give rise to air quality impacts. As such the likely effect of the operational development on local air quality would be not significant.
- 13.27 Lastly, a review of the LBC monitoring data and DEFRA background maps, indicates the future concentrations for users of the Development would be not significant.
- 13.28 Overall, the air quality effects of the Proposed Development are judged to be not significant with suitable mitigation. Accordingly, the Proposed Development therefore complies with the relevant planning policies.

Daylight and Sunlight

- 13.29 Paragraph 130 of the NPPF refers to securing a good standard of amenity for all existing and future occupants of land and buildings.
- 13.30 London Plan Policy D6 sets out that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context,

whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

Assessment

- 13.31 A Daylight and Sunlight Report has been prepared by GIA and submitted with the planning application. The Daylight and Sunlight Report sets out that all the relevant surrounding properties for the Proposed Development are commercial in use.
- 13.32 The Daylight and Sunlight Report prepared by GIA concludes that the effects caused by the Proposed Development on nearby residential properties will be entirely compliant with BRE criteria.

Ecology and biodiversity

- 13.33 London Plan Policy G6 sets out the expectation that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. It is stated that this should be informed by the best available ecological information and addressed from the start of the development process.
- 13.34 Policy A3 of the Camden Local Plan outlines that the Council will protect and enhance sites of nature conservation and biodiversity. The Council will grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species.
- 13.35 Additionally, Local Plan Policy A3 states the Council will assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed.
- 13.36 LBC published a Biodiversity CPG in March 2018 which sets out that development proposals must demonstrate how biodiversity considerations have been incorporated

into the development, how the five-point mitigation hierarchy has been addressed and what positive measures for enhancing biodiversity are planned.

Assessment

- 13.37 A Preliminary Ecological Appraisal (PEA) has been prepared by Waterman Infrastructure & Environment Limited which provides an evaluation of the importance of ecological features present within the Zone of Influence (Zoi) and assesses the potential effects that the proposed Development may have on any such features identified. The PEA is submitted as part of the planning application.
- 13.38 The Site is largely dominated by buildings and hardstanding with several scattered trees also present. A canal basin (known as Dead Dog Basin) is present wholly beneath Building B8 within the west of the Site which connects to Regent's Canal to the south, with a second open canal basin, which again connects to Regent's Canal to the south, present within the south of West Yard.
- 13.39 Regent's Canal is present adjacent to the south of the Site, with the remainder of the Site surrounded by buildings and hardstanding to the north and east and Camden High Street to the west. The Site is primarily used as a Sui Generis marketplace. Temporary market stalls are based in West, Middle and East Yards which are surrounded by buildings and used for food and beverage as well as retail.
- 13.40 As a result of the PEA and previous surveys undertaken at the Site and based on the Proposed Development, three IEFs were identified which have the conceivable potential to be affected both during the preparation and construction phase as well as the operational phase of the proposed Development through secondary effects arising from pollution incidents. These Important Ecological Features (IEFs) comprise the non-statutory designated London's Canals SMI (in the form of Regents Canal); open water (a CBAP Priority Habitat - in the form of Regents Canal), and fish.
- 13.41 The PEA recommends that standard environmental protection measures will be required to be adhered to during the preparation and construction phase of the proposed

Development to avoid and reduce the likelihood of a pollution incident and therefore the likelihood of secondary effects on these IEFs.

- 13.42 It concludes that following scheme fix and confirmation of the ecological protection and enhancement measures recommended in the PEA, the Proposed Development would be in line with National, Regional and Local policy.

Ground condition and land contamination

- 13.43 Policy A1 of the Camden Local Plan stipulates that the Council will seek to protect the quality of life of occupiers and neighbours. The factors the Council will consider include [inter alia] contaminated land.

Assessment

- 13.44 A Ground Contamination and Geotechnical Interpretative Report has been prepared by CGL and submitted with the planning application. The Report provides a summary of the ground investigation.
- 13.45 The proposed observation wheel is located primarily within the West Yard of the market, with one supporting leg extending towards the Middle Yard. The Middle Yard was originally used as the Dingwalls timber yard and the Site's built form and open spaces reflect its industrial past. Today, this space is predominantly used for craft products. The original Dingwalls building comprises a multitude of poor-quality extensions, stalls and light weight buildings to the west of the building. To the east of the Dingwalls building lies the market hall building.
- 13.46 The West Yard predominantly houses food stalls. This area was formerly known as Purfleet Wharf which used the canal basin to receive and transport goods.
- 13.47 The ground investigation was undertaken in May 2022 to allow logging the subgrade soils and recovering samples for laboratory testing. A summary of the geotechnical test results can be found within the Ground Contamination and Geotechnical Interpretative Report.

13.48 A preliminary waste characterisation assessment was undertaken on the four samples of Made Ground collected. The results of the assessment indicate that each of the soil samples would be characterised as “non-hazardous”. Further assessment identified elevated levels of PAH and Antimony in one of the samples which would be considered “hazardous” and therefore, disposal at a Hazardous Waste facility would be required. All other samples would be acceptable for disposal to a licensed inert waste facility or to a licensed non-hazardous waste facility.

13.49 It is therefore considered that the Proposed Development would accord with Local Plan Policy A1 and be acceptable in respect to any contaminated land concerns.

Fire Safety

13.50 Policy D12 of the London Plan requires that developments proposals must achieve the highest standards of fire safety. Part B of Policy D12, states that all major development proposals should be submitted with a Fire Statement produced by a third party suitable qualified assessor.

Assessment

13.51 A Fire Statement has been prepared by Jensen Hughes to assess the proposals. This has been submitted with the planning application.

13.52 The enhancements to the East Vaults include the painting of steel structures in fire retardant paint and a new wall separating the East Vaults from the market space which would be fire resistant for 60 minutes. The East Vaults proposal includes new evacuation zones in the event of a fire with the evacuation meeting point provided at Camden Lock Place

13.53 Additional emergency lighting and fire alarms are also proposed. The proposal therefore accords with policy D12 of the London Plan.

Flooding, Drainage and Sustainable Drainage Systems

- 13.54 The NPPF identifies that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.
- 13.55 At a local level, Camden Local Plan Policy CC2 advises that all development should adopt appropriate climate change adaption measures, including not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.
- 13.56 Camden Local Plan Policy CC3 seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible.
- 13.57 The Water and Flooding CPG (2019) states that the Council expects all developments, whether new or existing buildings, to be designed to be water efficient by minimising water use and maximising the re-use of water.

Assessment

- 13.58 The Site is located within Flood Zone 1, according to the Environment Agency Flood Map for Planning. As such, a Flood Risk Assessment has not been undertaken.

14 Planning Obligations and the Community Infrastructure Levy

- 14.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, Local Planning Authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land.
- 14.2 In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, the law states that a planning obligation may only constitute a reason to grant planning permission where it meets all of the following tests. The legal position is reinforced by paragraph 204 of the NPPF, which says that a planning obligation should only be sought where it is:
- A) Necessary to make the proposed development acceptable in planning terms;
 - B) Directly related to the proposed development; and
 - C) Fairly and reasonably related in scale and kind to the development.
- 14.3 Paragraph 54 of the NPPF states that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 14.4 Paragraph 55 of the NPPF sets out that planning obligations should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. It goes on to state that agreeing conditions is beneficial to all parties involved in the process and can speed up decision making. Conditions that are required to be discharged before development commences should be avoided, unless there is clear justification.
- 14.5 Policy DF1 of the London Plan ‘Delivering of the Plan and Planning Obligations’ states that when setting planning obligations in Local Development Plan Documents, and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should first apply priority to affordable housing and necessary public transport improvements, and

following this health and infrastructure, affordable workspace, culture and leisure facilities, in delivering good growth.

14.6 The use of planning obligations is specifically required through Local Plan Policy DM1 ‘Delivering and Monitoring’ although a range of individual development policies may be used to justify an obligation.

14.7 Local Plan Policy DM1 states that the Council will use planning obligations, and other suitable mechanisms, where appropriate; to support sustainable development; secure any necessary and related infrastructure, facilities and services to meet the needs generated by development; and to mitigate the impact of development.

Community Infrastructure Levy

14.8 On 6 April 2010 the Community Infrastructure Levy (CIL) Regulations 2010 (as amended) came into force.

Mayoral Community Infrastructure Levy 2 (MCIL 2)

14.1 Since 2012, all developments in London which result in the addition of over 100sqm GIA floorspace (with some exceptions including affordable housing) have been eligible to pay Mayoral CIL. In February 2019, the Mayor adopted a new charging schedule (MCIL2). MCIL2 came into effect on 1 April 2019 and supersedes MCIL1 and the associated Crossrail Funding Supplementary Planning Guidance.

14.2 Camden Community Infrastructure Levy

14.3 LBC adopted its revised CIL charging schedule on 1 October 2020. This levy replaced Section 106 Planning Obligations as the main source of developer-funded contributions towards community infrastructure. Affordable housing, local training, skills and job brokerage and site-specific mitigation continue to be delivered through planning obligations.

- 14.4 The Proposed Development would be exempt from CIL as the floorspace increase equates to 54sqm and therefore falls below the 100sqm threshold.

Developer Contributions Camden Planning Guidance (March 2019)

- 14.5 The Developer Contributions Camden Planning Guidance (CPG) sets out how LBC will use Section 106 Contributions and CIL to fund infrastructure in the Borough. It states that financial contributions will be sought in respect of affordable housing, open space, infrastructure to address the site specific and related impacts of development which may include financial, and non-financial contributions. Detailed guidance for calculating specific financial obligations is set out within the relevant CPGs.

- 14.6 At this stage, it is anticipated that the following s106 contributions and obligations involved with this development could include:

- 1) Operational Management Plan;
- 2) Cultural Plan;
- 3) Travel Plan monitoring;
- 4) Employment and Training initiatives;
- 5) Delivery and Servicing Management Plan;
- 6) Energy and Sustainability Plans;
- 7) Construction Management Plan and CMP implementation support; and
- 8) Processing and monitoring charges.

15 Summary and Conclusions

- 15.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise. This Statement has assessed the Proposed Development against the development plan and other relevant planning policy and guidance at national, regional and local policy level.
- 15.2 The Proposed Development aligns with Camden's 'We Made Camden' pledge and the Camden 2025 vision by committing to:
- a) working with local schools to provide learning opportunities, focussing on the history of the canal as part of a permanent exhibition within the East Vaults and the local geography which can be appreciated at the top of the temporary observation wheel;
 - b) developing the exhibition spaces and temporary observation wheel to promote both the international make up of Camden's diverse communities as well as look to promote international creative connectivity through music performances and visual arts;
 - c) developing actions to promote the new heritage initiatives to disadvantage communities through work with community groups and the Knowledge Quarter; and
 - d) upgrading the existing unused heritage spaces and installing the temporary observation wheel to attract a wider more diverse audience from Greater London and beyond which in turn would contribute to the local economy by providing increased footfall and spending within Camden High Street and the Borough.
- 15.3 The Proposed Development delivers significant heritage benefits associated with a viable use and public access to the listed building, allowing for a new appreciation and understanding of the building's particular significance, including its function; structure; and historic connections to the canal.
- 15.4 The Proposed Development seeks to celebrate the rich heritage of the area by allowing public access into the East Vaults and Dead Dog Basin. The proposed observation wheel would also provide opportunities for visitors to enjoy elevated views of the market complex, the Regent's Canal, and local heritage/townscape context. It would provide opportunities for visitors to gain

different appreciation of the history of this part of Camden and the significance of nearby heritage assets, including the former historic and functional connections between canal and railway, including the legible spatial relationships and connections. Those new experiences and appreciation of heritage significance are a public benefit, albeit temporary, to be considered in the overall planning balance.

- 15.5 The introduction of educational, cultural and leisure land uses promote wellbeing and would enhance Camden Town Centre. The temporary observation wheel would be resold in its entirety after five years.
- 15.6 The introduction of a comprehensive waste storage facility which would be managed by the Applicant and iRecycle to cater for the markets owned by the Applicant is environmentally sound. The Applicant is therefore environmentally sustainable and responsible. The Applicant will endeavour to continue to minimise anti social behaviour in the area and would create an environment which feels safe during the day and evening.
- 15.7 As set out in this Statement, the Application complies with the relevant statutory tests, policies within the NPPF, the London Plan, the Camden Local Plan, relevant emerging planning policy and the principles of the presumption in favour of sustainable development. From this Statement, it is concluded that there are no material considerations of sufficient weight to determine that these applications are other than in accordance with the Development Plan. On this basis, planning permission should be granted accordingly.

Appendix A

Address	Application Ref.	Proposal	Decision
West Yard Camden Lock Market	2022/1244/P	Temporary installation of 30 market stalls (sui generis use) for a period of 18 months.	Granted 20 May 2022
Middle Yard Building Camden Lock Market	2021/5328/P	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 February 2022
The Stables Market, Chalk Farm Road and Camden Lock Market, Camden Lock Place	2021/5315/P	Temporary installation of dining pods across the Stables Market and Camden Lock Market for a period of 1 year (retrospective).	Granted 25 January 2022
Market Hall Camden Lock Place	2021/1040/P	Removal of temporary flat roof and reconstruction of the Market Hall Building roof to match original roof.	Granted 27 April 2021
The Stables Market Chalk Farm Road and Camden Lock Market Camden Lock Place	2020/5050/P	Temporary installation of 18 dining pods across the Stables Market and Camden Lock Market until April 2021.	Granted 6 January 2021

<p>The Stables Market and Camden Lock Market Chalk Farm Road</p>	<p>2020/0267/P</p>	<p>Installation of freestanding parasols within the Stables Market and Camden Lock Market</p>	<p>Granted 25 February 2020</p>
<p>West Yard Camden Lock Market</p>	<p>2017/2378/P</p>	<p>Installation of 34 temporary market stalls (A5 Use) in the West Yard of Camden Lock Market</p>	<p>Granted 12 April 2017</p>
<p>Camden Lock Market Site Chalk Farm Road</p>	<p>2015/4774/P & 2015/4812/L</p>	<p>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.</p>	<p>Granted 18 August 2016</p>

Camden Lock Place	2007/2116/P	Installation of two freestanding retractable canopies in the centre of Camden Lock Place.	Granted 28 June 2007
Camden Lock Market Middle/West Yard Camden Lock Place	2005/3087/P & 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 November 2005
West Yard Camden Lock Market	PEX0200417	Alterations to the flank elevation fronting the canal comprising the installation of an additional window opening at first floor level and together with a circular 'bulls eye' window opening on the gable end at second floor level.	Granted 16 July 2002
West Yard Camden Lock Market	PEX0100733	Alterations to existing timber decking over canal basin to enable the mooring of three narrow boats.	Granted 13 November 2001
West Yard Camden Lock Market	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	Granted 2 August 2001

		ground floor of the building fronting the canal.	
Building K, Camden Lock Place	PE9900875	The erection of a three storey building for use within Class A3 on the ground floor, as an Internet cafe (sui generis use) on the 1st floor and for studio/workshop use within Class B1 on the 2nd floor.	Granted 23 March 2000
West Yard Camden Lock Market	PE9900147	Erection of glazed roof and replacement balustrade railing to existing open balcony area at first floor level to the West Yard	Granted 26 May 1999
West Yard Camden Lock Market	9201356	The erection of a new decked structure over the canal basin at the land known as West Yard Camden Lock	Refused 2 April 1993
West Yard Camden Lock Market	9100253	Re-arrangement of the existing restaurant and retail workshop accommodation and alterations to the permitted first floor walkway including a new access to the towpath	Granted 28 November 1991
Stanley Sidings Chalk Farm Road/Camden Lock Place	8903570	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	Granted 23 November 1989



		public toilet together with car parking servicing and access arrangements.	
--	--	--	--