

THE REGENTS NETWORK

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Dean Wooding
Planning Department
London Borough of Islington
222 Upper Street
London N1 1YA

20th February 2012

Dear Dean Wooding,

CANALSIDE BUILDINGS
Beside City Road Locks N1 8JY
Planning Application Ref: P112783
Duncan Terrace Conservation Area

I strongly oppose the application for what is loosely referred to as 'change of use' of the lockside brick buildings to a cafe.

With the amount of building work and alteration required, the application needs to be more robust rather than being slipped through the scrutiny system as only a 'change of use' with perhaps one or two ancillary details thrown in. It should not have been validated by LB Islington under those terms.

A weak application

The application is not supported by sufficient information and detail, and the supplied drawings on the LBI web site are inadequate. The artist impressions of the proposed buildings are very misleading, and show a distorted view of the setting, including an exaggerated open space between the buildings and the canal locks.

Also, outside seating is shown in one of the 'impressions', but this does not form part of the application and there is no further information or detail about the seating. If it is thought a good idea to have external seating, then it has to go through the proper application and consultation process rather than being hinted at. Outside tables and seating cannot be added at this stage with the consultation in progress.

Other details are not clear such as the treatment of the roof structures. Apart from the roof on the 'upstream' building being raised in some unknown manner, the roofs on the other buildings are shown on the 'impressions' as completely changed without any further detail or description being given, even though they are in a conservation area and abutting the Grade II Listed structure. If they are not to be altered as shown, then this demonstrates the poor quality of the detail and information in the applicants proposal.

External appearance important

In fact the roofs of all the buildings in the group do need attention, including the one towards the eastern end which is corrugated iron and in poor condition.

These are significant buildings, and although unsympathetically treated over the years, with a certain amount of rebuilding, they are all that is left of a larger collection of canal buildings with a pump house, stables and the like. They are situated in an historic setting beside the 200 year old City Road Locks, and abutting a Grade II Listed wall of the Listed Primary School. They are in a conservation area, and they are the sort of buildings that should be up for consideration for local listing.

It is noted that the importance of the location is not disregarded by LB Islington who include the cautionary comment that “this application may affect the character and appearance of a conservation area and the setting of a listed building” in the application details on the website.

Restoration a priority

The focus of the planning application should be the restoration of the group of buildings, rather than a proposal for a few alterations (unspecified) to achieve a ‘change of use’. The applicant’s approach is very unsympathetic as well as inadequate.

It must be emphasised that these are canal buildings rather than just a location for a cafe, and situated on the renowned Regents Canal that is approaching its Bi-Centenary Celebrations.

It should also be made clear that the focus should be on the appearance of the group of canal buildings as an asset to the historic setting, and their potential to make a positive contribution to the canal and the conservation area, rather than just concentrating on their use.

Incompatible wooden addition

The treatment proposed for the upstream building with superficial wooden cladding is not acceptable, and would constitute an eyesore in this special setting of the Regents Canal and conservation area, etc. Also, this wooden structure would be abutting a grade II Listed brick wall and would be totally out of place as well as conflicting with a number of planning policies which protect our environment and historic locations.

The alien wooden structure would not be a pretty sight, and would look inferior and vulgar. This group of buildings may not be sophisticated and decorative, but they have a certain amount of merit and character, and the mundane wooded cladding which appears to be a cut-price treatment is not acceptable.

The ‘raised roof’ on this end building is not detailed. The height of the building is also raised, and this would conflict with the historic brick wall that the building stands against. A more suitable solution for this building would be the provision of a peaked roof which would be visually acceptable if constructed to historic proportions, and would not require the raising of the external walls. It appears that the next-door building already has (or had) a peaked roof of some sort.

A change to the wrong use

The key problem with this application is that it provides the wrong use for the canal buildings.

British Waterways will become a ‘trust’ in the near future, and above all there is a need for canal premises for all the volunteers who are being actively recruited to work for the charity.

The canal buildings at City Road Locks would make a very suitable community centre for canal volunteers and workers involved in the maintenance and management of the Regents Canal along a stretch of the waterway east of the Islington Tunnel.

There has not even been one suggestion from British Waterways that they will provide premises for volunteers. We cannot be expected to help run the canals (nationally) from our kitchen tables, and it would be a serious constraint on willing and active people attempting to help manage and maintain a worthwhile and secure future for our canals, nationally, if they do not have some sort of canal centre and premises.

This issue is relevant to this application for a cafe, as the consent should not be given for a non-canal use of these canal buildings.

A planning issue

The detail of the use of the canal buildings is a planning matter, and I refer to the London Plan (July 2011) [Policy 7.24 ‘Blue Ribbon Network’](#) which states that land alongside waterways

should be used 'for water related purposes'. In the following Para 7.71 goes on to say 'the starting point for consideration of development and use of the Blue Ribbon Network and the land alongside it must be the water'.

No doubts there that the use of the canal buildings alongside City Road Locks should be prioritised for Regents Canal uses, such as a centre for the canal community and volunteers. In contrast a cafe as proposed in this application would have difficulty in achieving such wide and relevant uses, and this provides grounds for the application to be rejected.

See also London Plan **Policy 7.9 'Heritage-led regeneration'** which will assist in leading to a proper restoration of the important canal buildings at City Road Locks, which would not be accomplished by the current proposal that is focussed on the use of the buildings as a cafe rather than the heritage canal buildings themselves, and this gives another reason for turning the planning application down.

Also in the London Plan there is **Policy 7.4 'Local Character'** which states that buildings and spaces beside the canal 'should be designed to activate the Blue Ribbon Network in a way that is appropriate to its character, infrastructure value and heritage significance'. Activation of the uses and enjoyment of the Regents Canal is something that a community and volunteer centre at City Road Locks would have as a key focus, and something that a facility such as a cafe would not achieve.

Wide ranging uses

Mind you, with this useful group of buildings by the Regents Canal, there is no reason why a cafe should not be included as well as other canal uses for the community and volunteers. In fact there could be a small community-run cafe that provided an amenity for towpath users and visitors as well as generating funds for supporting the charity status of the Regents Canal.

However, this will have to be the subject to further negotiations, and would require a separate planning application in the (not too distant) future if the opportunity arises.

Responsibility and good management

This is something that we have leaned not to expect from British Waterways over the years, and we are very disappointed in general with the manner in which BW have managed the canals and their assets in London.

In the case of the canal buildings at City Road Locks, we consider that British Waterways should never have encouraged this non-canal application for change to a cafe, against consideration and responsibilities they have to the community that they are busy recruiting.

A 'starbucks' type cafe may make a bigger income for BW, but it would provide only a limited service to the canal and community and visitors, and no long term benefits.

When British Waterways becomes a charity (the start date is now delayed), there are going to be (theoretically) large numbers of volunteers. At a 'honey pot' location like City Road Basin it would be necessary to provide some sort of premises, and this provision should be repeated at a number of locations around the canal network in London. To date British Waterways have not supplied any volunteer premises in London, nor have they even mentioned that it is their intention to do so.

With BW being considered over the years as a failed organisation by myself and increasing numbers of the canal and boating community, then I suspect a lot of reliance will have to put on the community and volunteers to keep the canals going and up to a good standard in the future. With British Waterways becoming a charity I think that even more will be expected from the community.

Who will lead?

It would be very welcome for the Council to take some sort of responsibility to ensure that the canals are well managed on their patch, when BW change to 'charity' status. Pressure (or at least some active interest) from the Council to provide adequate premises for volunteers and community workers would make a great difference. A certain amount can be done by Islington through a number of community initiatives, as well as regulating the situation such as the canal buildings at City Road Locks by the planning system.

The lead should come from British Waterways, but they seem to have no idea what they are doing half the time. I hope it does not take them too long to find their way forward.

Local involvement grows

This canal buildings issue has arisen at a time when local involvement and transfer of responsibility on to the community is under way with the recent Localism Act.

In this context I refer to the Quirk Review 'Making Assets Work' (May 2007) which is a government guidance for community management and ownership of public assets.

"There are clear benefits of local groups owning or managing community assets such as village halls, community centres, building preservation trusts and community enterprises" (Secretary of State for Communities and Local Government, QR Foreword). The ownership or management of the canal buildings at City Road Locks could well be added to that list.

This is a Government initiative which they (government) are slow to implement.

National Grid addition

There is a brick building added to the east end of the canal buildings which is not part of the application, with a concentration camp style barbed wire construction on its roof. It was erected by National Grid who did not get planning consent for its construction. They do have certain 'permitted development' powers, but the legislation also requires them to have regard to conservation areas and historic settings. They cannot do whatever they like at this location.

Enforcement action is needed to improve the building and for the ugly fence to be removed from its roof.

Invalid application

I have already mentioned that the application should not have been validated as the details and drawings are not correct, nor adequate. Also the extensive building works and alterations are very much more than expected under the title of 'change of use' which has been very misleading. In addition the historic setting and conservation area details have not been fully appraised in the documentation.

To add to this, there were no site notices displayed at City Road Locks, which invalidates the consultation and planning process.

Attached is a page from the Islington Gazette, and someone spotted by chance that the canal buildings application was listed. A legal requirement was satisfied, but this sort of notification to the public is far from satisfactory and does not say much for the council's accountability.

Yours sincerely,



Del Brenner
Regents Network and
a member of the London Waterways Commission