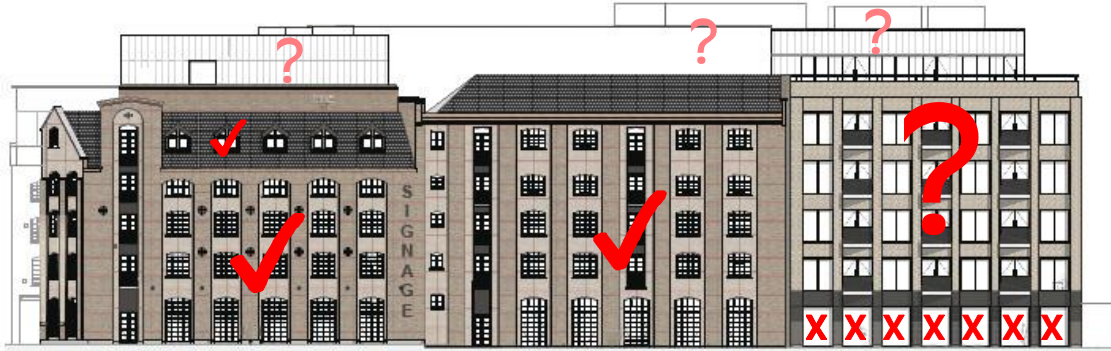


THE REGENTS NETWORK

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A WATERWAYS RESPONSE TO THE REVISED DEVELOPMENT OF REGENTS WHARF



· · THE REGENTS CANAL · ·

Bi-Centenary 1st August 2020



LB Islington Planning Application P2019/3481/FUL

The revised plans for this site have been thought through and redrafted with more care and sensitivity since the rejection of the previous unacceptable application – at least as far as the impact on the Regent's Canal is concerned, and the heritage details of the existing nineteenth century buildings. The main exception to this positive outcome is the canal elevation of the newly designed Thorley House.

✓ The elevations of the heritage buildings along the Regent's Canal are much more satisfactory, except for the rather prominent Juliet balconies sited on to the elevation where the loading bays were on each floor with their rope and block hoists. The two small balconies are very unfortunately prominent and far too small to be of great use. The window opening could be floor to ceiling with a guard rail across the lower section for safety – but not as an out-of-place protuberance on the heritage elevation.

Although not retaining the original details and appearance, the addition of the windows in particular has been carried out very successfully, and it still demonstrates its commercial character. Also the pitched tiled roof in the central section is appropriate.

Relatively few old buildings survive along the canal, and even though the façade of this one has been remodelled, it is still an important 'flagship' heritage building. It is so significant that it demonstrates the historic presence of manufacturing industry that gathered along the canals which were the major transport routes through two centuries.

It is also important that canal transport is celebrated for its heritage importance and is still in good working order, although unaccountably sidelined and not taken advantage of. The 100 miles of canals in London could take a huge amount of traffic off the roads, while reducing air pollution. The heritage buildings of Bartlett's Cattle Food Supplies are a timely reminder of the role and importance of canals.

✓ The dormer windows have been retained rather than clumsily remodelled as in the failed Appeal Scheme. It was a very strange design and idea, and looked most ugly and out of place, and the resultant internal arrangements were not very suitable as it transpired. No reason (or apology) has been forthcoming for the complete misfit, and the incompetent decision to impose a totally out of character, and tasteless disfiguring of a perfectly sound heritage elevation. Heritage prevails.

? The Thorley House canal elevation is very out of place, and does not belong to the special location beside the Regent's Canal. The building is unfortunately a gross solid block sited right up to the edge of the heritage canal. Also the building is a number of metres higher than the existing building, although this is not prominently mentioned – nor justified. This inflicts additional overshadowing of the conservation area and should not be permitted. With a bit of good will and impartiality, the applicant could have considered reducing the impact on the canal, perhaps by setting the top level(s) back, or setting the whole building back which need not have a significant negative effect on the internal space.

The contrast of the Thorley House hard façade with the elevations of the neighbouring heritage buildings along the canal is far from acceptable. It is plainly unnecessarily unsuitable, when with a bit of skill and ingenuity a more fitting elevation could have been designed – not a copy of the heritage but sympathetic to it rather than a complete clash.

The balcony blight x 12 of them

Balconies everywhere around London are becoming a serious blot on the local surroundings and views, and a scourge to the environment. They have become obsessive, and too often not appropriate. Most of them stand empty anyway, just as these small protruding balconies will not be used. They seem to be a promotional contrivance rather than a facility.

The balconies on each floor of this development are certainly not appropriate. For ventilation in the absence of air conditioning, the windows could be top opening, or full height with a guard railing rather than a redundant balcony.

As it can be seen, the balconies are threatening the boundary of an important conservation area, and are aggressively encroaching into the treasured open space of the Regent's Canal. This is definitely well out of order.

The applicant seems insensitive and uncaring of the significance and need for the protection of the canal's open space character, which is much appreciated and should be given more attention. In the legislation, London's waterways (and water spaces) are designated and safeguarded just as a park. The question to ask is, would this development with its overbearing balconies be acceptable on the boundary of a park? The answer is definitely No!

Also according to policy and the building regulations, it is worth pointing out that balconies cannot be considered as an 'amenity' in planning terms.

The design of the façade seems to have a leaning towards residential use, and is it the intention of the applicant at some time to have a change of use to residential (by permitted development) with the greatly increased profits that would result? Otherwise, this elevation with bulging balconies seems to be misplaced.

These misfit bolted-on balconies are north facing! For whatever use is intended for the building, the balconies are impractical, and most unwelcome. Are the balconies just for effect and as a sales promotion?

Looking glass

The Thorley House elevation to the canal needs quite a lot of care and attention. For a start there is too much glass and not enough brick. There is need for good daylight into a building, but not necessarily such a close connection with the outside world with large expanses of glass. Instead of the elevation being mostly glass with a bit of structure in between, it would be more appropriate for there to be a brick façade with windows inserted, even generous windows. But floor to ceiling glass panels are most unsatisfactory, and perhaps an overworked architectural cliché.

Along with the all-too common bland and boxy look, glass has a very hard appearance even though it is transparent, and large areas of glass are solid and unrelenting, whereas brick on the other hand is more gentle and animate, and certainly more suitable in this conservation and heritage setting.

Also, but not readily admitted, too much glass area is not necessarily very comfortable from the inside, and certainly not a requirement in an office situation. The function of the windows is to provide light, and provide comfort with a connection to the outside. In this application the 'north light' is quite appropriate



although very much overdone. Where business is to be done it is a serious drawback to attempt to make it seem like the room is outside, and especially when it seems to be encroaching into a canal environment.

XX The ground floor windows in the Thorley House canal elevation are far from satisfactory and the proportions are uncomfortable with unsuitable floor to ceiling glass. At the very least the windows need a base, with a low sill at a comfortable level from the floor.



No business or commercial office can thrive in a goldfish bowl, especially with such an expanse of glass. It may be fine for a sitting room with a nice garden view, but unsuitable for an office environment which needs an inward and businesslike focus that is not distracting. It might not be long before the occupants think about rearranging the furniture and hanging net curtains to provide some priority rights and privacy.



Why have so much glass when it is much more expensive than brick, and is more vulnerable, and definitely requires much more maintenance and cleaning – for ever.

Glass seems to have become a staple of architecture and much copied, apparently for no fundamental reason, and it is hoped that it will be a passing phase as by now it may have transcended originality and no longer a great progressive step forward. It is certainly not a necessity for it to be one of the primary features of a development, although glass may be seen as a sound way to impress clients that something profound is being produced, and for others to then follow the false trail.

Also the glass production is a high energy-consuming process, with the resultant air pollution contributing to global warming, which may not sit too comfortably beside an extensive Conservation Area and a Site of Metropolitan Importance for Nature Conservation, but that may not touch any developer's sensitivities.

Focussing back on the heritage elevations of the original buildings rising from the Regents Canal, it is interesting that the repetitive elements in these elevations look well proportioned, whereas repetition in the Thorley House elevation is very mundane. It is difficult to define the elements in architectural terms, but suffice it to say that the relationship of the heritage elevations is well balanced and there is a sense of harmony, in contrast to the expanse of the Thorley House canal elevation which is fragmented and boxy. Also the heritage elevations successfully convey a commercial appearance which is appropriate to the Regent's Canal heritage character over the past two centuries.

Incidentally, the west elevation of Thorley House by the garden is much more straightforward and less harsh, whereas the canal elevation looks like it has been designed by a computer – rather than with the aid of a computer. There is no 'design' key on the computer keyboard. Bring back architecture.

?? The bulky roof additions to the buildings are still a matter of contention, and for good reason. The extensions are less prominent, but still are not very appropriate and sensitively sited. The local residents will have their say about the continued shading and light blocking, even though the bulk of the extension is reduced, and they may not be any happier with still having the blot on their skyline.

The scale problem could be solved by using more space in the upper floors of the buildings for plant and equipment. In principle there is no justification in planning terms to add extra floors for accommodation or offices, so why should it be expected (almost as a given) that they can add floors so long as it is 'plant'? There will be an agreed height for a building, and that is it.

There are too many development blocks on London's skyline with large boxes piled on top, without admitting that extra stories have been added. Heating technology, and especially air conditioning, have made great strides forward and are a major improvement that is welcome. But this cannot be carried out at the expense of our environment and neighbourhoods – and skyline. Nor, in this case at the expense of the local residents and their comfortable living. A lot of revisions have been made, but more revisions are needed, please.

✓✓ Of course, in 2020 the Regent's Canal Bicentenary must not be neglected, and could be celebrated by bringing the canal back to life – legitimately, not contrived – by being used for what it was built for, a revolution in transport. Transport on London's canals would not exactly be an upheaval, but certainly a bold and essential redevelopment of the 100 miles of unused canals in London – 100 miles!

CANAL or ROAD TRANSPORT?

No contest in construction of this canalside application

The applicants may not be very positive about using the canals for the construction of the All Saints Street development. But the site is more generally known as Regents Wharf, which gives a clue with its name.

It seems all too plain that the reluctance by the contractors to recognise the ease and benefits of canal transport during construction derives from a lack of general knowledge and experience of water transport, which is fully understandable as road transport has become so dominant. In the 1960s huge amounts of money were poured into roads at the expense of rail transport (still suffering from lack of investment), and canal transport with its finances reduced to near zero.

Of course it is the potential of rail and canal transport that remains the same, and they are viable and necessary modes of transport, and it is high time that the potential of the canals to become active and productive was realised. The Regents Wharf development is an opportunity not to be missed.

Be reassured that the framework and basis of canal transport is well and active, although at a low ebb. But it is viable and ready to go. At least the ridiculous comments in the previous application are not repeated that the canal is too shallow to permit transport! However, it seems still to be the case that the applicants will try anything to dismiss the use of the canal and favour the road transport companies to which they may have a regular relationship.

Kings Place relied on the canal

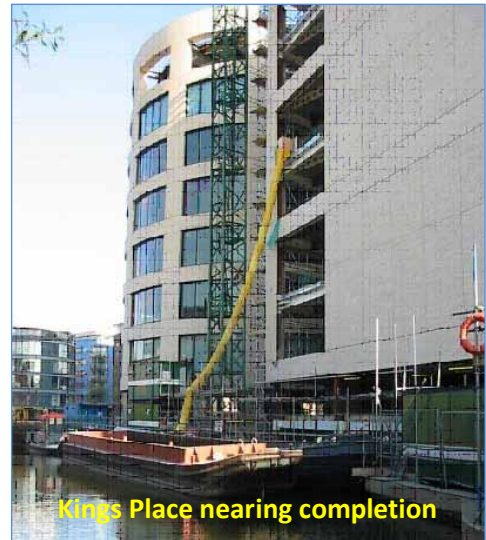
The practical use of the Regent's Canal is all too evident in the construction of the renowned Kings Place development just a short distance along the canal from Regents Wharf. This is mentioned in the applicant's reports, but not followed through, which is surprising as the contractors will not be able to deal with the heritage elevations of the site, let alone the new construction of Thorley House, without a barge platform along the canal front.

These barges may be static, but the contractors urgently need an extension to the very confined site. Why is this not dealt with, or even prominently mentioned? But the applicant and contractors seem to be in denial about anything to do with the canal.

Road transport high costs

The applicants are also in denial about costs of road transport, with support of biased and selective comments including that 'use of the canal is not viable' (DP9 report, para 3) which exaggerate canal transport costs without even mentioning significant road transport costs. For instance there is no mention that canal transport has 20% lower emissions than lorries, so the cost to the environment is far less. Yes, emissions have costs which have to be accounted for, and a responsible developer and the contractor have an obligation to deal openly with this. Some of the issues, and hidden consequences of road transport that would incur costs include:

- air pollution - emissions and dust etc
- disturbance and noise,
- contractors use diesel transport (the worst offenders)
- lorry disruption through miles of London streets
- parking and pedestrian restrictions in local streets
- narrow local streets obstructed
- safety of public and residents not fully appreciated and considered
- negative effect on quality of life of residents – locals, borough, London
- cost of pollution control and remediation
- cost of work days lost to air pollution illness
- known cost of people's lives and early death
- health and social costs estimated at over £42m in 2018
- considerable disorder – compared with canal transport (smooth, gentle and quiet).



All these above items are now relevant and directly attributable (note!), and the developer and contractors are accountable. So is the Borough of Islington which must see that its residents are respected and cared for.

Liability

The building and development contractors may still get away with not directly covering the environmental costs at present, but their liability is the same as for everyone else, and they are accountable. They may not be handing over money for their environmental and public shortcomings, but they are now obliged to recognise the situation and acknowledge their inadequate performance of the above issues – and more – and react responsibly.

The higher costs of using water transport can be justified, if it is considered a requirement these days for not contributing to the pending climate change. The borough should see that this is taken into account, and make it a Condition to the planning consent that water transport is used rather than lorries where possible. Anyway, the additional costs may not be high, and perhaps that is one reason why the applicants have redacted essential information in the development reports.

It would be nice if one could rely upon the probity of reports from consultants, who in general seem to say what the developer pays them to say. It would be nice to sometimes have an honest and trustworthy report from a professional company! A more reasonable example in this application is the report from PBA who gave a fairly sound report on canal transport rather than making-up problems.

Clutching at straws

The ‘problem’ of the floating birds nests on the canal beside the Regents Wharf site was raised by the applicants, claiming that if water transport was used it could delay the development of the project by months if barges were prevented from operating during the nesting season (1st March to 31st July).

The implied drawback was to no avail, and it was agreed that the nests could readily be removed during the construction period, and happily reinstated afterwards (PBA, Para 2.4.6). So that meant there was one less negative comment about water freight.

What programme delays?

There were a number of strange comments that several (?) contractors said that canal transport would cause ‘potential’ delays without any reasons and details given. The consultant DP9 chipped in with ‘significant’ without explanation, just as they exaggerated canal costs as ‘extensive’ with no reason or proof, but with too much attitude. It is only a matter of planning and rescheduling for use of barges rather than lorries.

Waste away – quietly

It is not always sunny, but water is always a very practical and financially sound means of bulk transport.



Building waste from the refurbishment of the tv am building coming through the lock at Camden Town and then towed quietly by tug to the Powerday depot in West London. The tv am Regent’s Canalside site is in a busy market area with narrow road access, but by using tugs and barges the huge amounts of building waste were readily transported with no disturbance and fuss. This situation is very similar to the Regents Wharf development which is only a short distance along the Regent’s Canal below Camden Town. All doubts of canal transport should be removed.

The developer of Regents Wharf cannot continue to be in denial about using canal transport rather than the disruptive lorries. The regular use of barges and tugs may take a bit of getting used to, but there are many experienced people around who can assist and advise, and also many authorities, legislators and officials who will give encouragement. Interestingly there are lorry operators who are interested in managing their own water transport businesses (including on the Thames of course) as they admit that they are the transport experts who can use their knowledge and experience (and logistics) to good effect.

Feasibility

There is a canalside wharf in a wide opening between the buildings on the application site that is ready and waiting to be used by canal barges. This could provide the contractor's transport requirements.



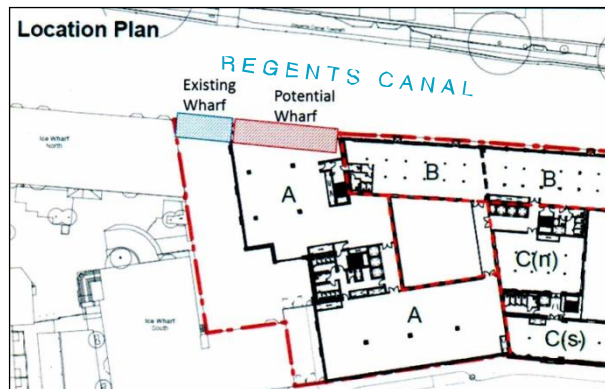
An extract (*below right*) from one of the applicant's documents clearly shows an available existing wharf at the site, which can be put to good use from the outset. At an early stage Thorley House can be demolished and the rubble dropped directly into barges through rubble chutes, and as the demolition proceeds then a larger wharf area could become available.

The applicant's documents state that "the handling of bulk materials on to a barge are no different from that of loading a tipper truck". (PBA, Para 4.6.1). The main difference is that a barge can transport at least 60 to 80 tonnes at a time, and that is a lot of lorries. So why the denial about using barges instead of lorries?

It is only a matter of rescheduling, as the logistics and management are very similar, and not complex.

Barges moored along the canal bank beside the site can provide a solid working platform which effectively increases the site working area, and also can provide a good base for scaffolding, for instance. See the example for the mega construction operation at Kings Place along the canal.

It is hoped that common sense will prevail, and that the applicant and contractors will revisit their works schedules and take particular note of the advantageous location beside one of London's great canals, sitting there quietly waiting to be appreciated and used, and brought back to life.



Vital information withheld

In this planning application there are concerns that the applicant and consultants have provided incomplete documentation for the application, particularly over the issues connected to the use of water transport. The applicants clearly say that canal navigational conditions are acceptable, and that using barges is similar to using lorries. It is then said that it is the water transport costs that will decide the matter, without providing full details of lorry costs, including environmental costs (see above), so the comparison cannot be made.

But it is unbelievable that the supposed high costs which are given, the key to resolving this important matter, are not available as they have been redacted! How confusing is that?

Redacting not valid

Redacting of important details is not a valid action in a standard planning application such as this. The financial information is not 'sensitive' as it is not personal, nor does it have any security implications. Sensitive information that could be used to commit fraud, or expose private information should be redacted. However, the selective disclosure of information in a document in the public domain while keeping other parts of the document secret is not legally sound.

This restriction applies to a matter of public record, such as a planning process, as the information is provided to engage in and inform a public operation. If it is presented by the applicant to inform and influence the decision, then it is clearly in the public domain.

In effect any redacted matter cannot be used or referred to by the planning department. The abuse of redacting planning reports is all too common and is generally mistrusted and strongly disapproved of. The redacted financial details of this application must be revealed before it can proceed.

Summary and comments

This revised application is an improvement on the failed previous application that was roundly objected to and thrown out at a Planning Inquiry. At least the heritage elevation to the Regent’s Canal has now been dealt with more sympathetically. However, although the roof extensions have been reduced, they are still not acceptable and it is questionable whether the ventilation and plant should be contained within the existing building without the doubtful addition of extra floors.

A serious blot on the Regent’s Canal environment is the ‘redesigned’ Thorley House with its mundane repetitive front elevation and the excessive use of large areas of glass, which is also very impractical for that location and its business function. The computer visual representation of staff beside the picture windows casually engaging with the scenery is misleading and not credible, rather than showing rows of desks and computer screens. The addition of very unsightly balconies (12 of them) also raises the question of whether the real intention of the applicant is to provide residential use. The balconies are also a serious intrusion into the canal’s open space.

The use of tug and barge transport on the Regent’s Canal rather than the polluting road transport is a major consideration in the construction schedules, and the hidden costs of use of lorries against the illicit redacting of the barge costs has raised issues of the applicant acting irresponsibly. Any hope for 1,000 fewer lorries?

The applicant gains great advantage from developing beside such an iconic and calm feature as the Regent’s Canal, but it seems that no concession or respect is readily given to the Regent’s Canal in return. They take from the canal but give nothing back, not even consideration and care.

DEL BRENNER

Regents Network and

associate of London Forum and Just Space

and member of the Mayors former London Waterways Commission Freight Group

May 2020

APPENDIX

The illustrative canal map shows the potential of the use of tugs and barges in London or more likely, self-propelled electric barges with hydraulic loading gear

