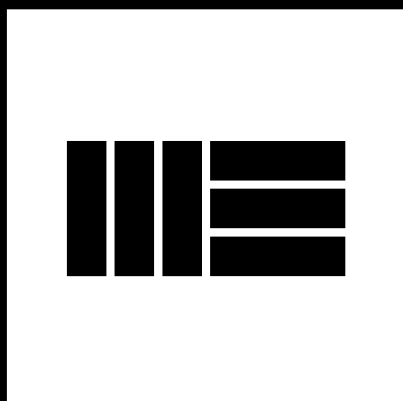


SEARLE HOUSE AND BENJAMIN HOUSE ST EDMUND'S TERRACE, CAMDEN

TOWNSCAPE AND HERITAGE ASSESSMENT

16 JUNE 2023



INTRODUCTION

Montagu Evans has been instructed by Cooper Group Developments (St Edmunds) Ltd (hereby referred to as the 'Applicant') to undertake a townscape assessment of the proposed changes to Searle House and Benjamin House and produce this note to assess proposals at Cecil Grove, St John's Wood (the 'Site').

The Site is located in the London Borough of Camden (the 'Council'); the border with the City of Westminster runs along the middle of St Edmund's Terrace. A description of the proposals (the 'Proposed Development') has been provided in the Design and Access Statement prepared by HUB Architects.

PURPOSE

The purpose of this document is to aid the Planning Inspector in assessing the effect of the Proposed Development according to the requirements set out in The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) Schedule 2, Part 20, Class A – New dwelling houses on detached blocks of flats), Paragraph A.2 (conditions), conditions (1) (e) (The external appearance of the building).

The document does this by:

- Assessing the design quality of the proposals and the manner in which the extensions respond to their host buildings;
- Establishing the baseline of and assessing the sensitivities of the surrounding townscape and heritage assets; and
- Assessing the design quality of the Proposed Development to Searle House and Benjamin House in relation to the surrounding townscape and heritage assets.

CONTENT

This note comprises:

- Introduction;
- Historic development;
- Townscape and heritage analysis of the baseline situation;
- Townscape and design impact assessment of the Proposed Development; and
- Policy compliance

EXECUTIVE SUMMARY

The townscape around the Site is varied and comprises large footprint residential blocks of up to ten storeys. The existing buildings on the Site make a positive contribution to the surroundings.

The proposed additions to the buildings are modest and designed to complement the architectural character of the host buildings. Views of the additional storey on each building from the public domain are likely to be very limited due to the design, layout and orientation of the development. Where they can be seen, they will appear as proportionate and well-designed additions.

Our judgement concludes that the significance of all designated heritage assets in the study area would be preserved in accordance with the relevant policies of the development plan. The only heritage asset within whose setting the Site falls is Primrose Hill Registered Park and Garden, listed at grade II. The Proposed Development is too small to be perceived from

Primrose Hill, and the Proposed Development would cause no harm. As a result, paragraph 202 of the NPPF is not engaged.

In townscape terms, we conclude that the Proposed Development complements the existing buildings and the wider townscape at St Edmund's Terrace.

SITE DESCRIPTION

The buildings under consideration are two buildings within St John's Wood, north of Regent's Park and on the western edge of Primrose Hill, within the London Borough of Camden. The buildings are modern apartment blocks, built between 2012 and 2015. Searle House (Block A) has 6 storeys. However, due to the topography of the wider area, the ground floor is built into the slope, and the east elevation onto Broxwood Way has only 5 storeys. As a result, when seen from the northeast Searle House appears as a 4 storey building with a 1-storey roof pavilion. Benjamin House (Block B) has 4 storeys. The predominant uses in the area are residential, largely in the form of purpose-built flats in multi-storey blocks of up to 10 storeys.

The site is not located within a conservation area, and there are no listed buildings on the Site. Nor does the Site lie within any designated view identified in the adopted development plan. There are Designated Heritage Assets in the surrounding area: No. 25 Avenue Road, listed at grade II, is approximately 115 m to the west. The Elsworth Conservation area lies c.75 m to the northeast, and the grade II Registered Park and Garden at Primrose Hill lies c.200 m to the west. Regent's Park, listed at grade I and designated as a conservation area, lies approximately 170 m to the south. Both Regent's Park and Primrose Hill are Metropolitan Open Land.

The Site lies within 10 minutes walking distance from both Chalk Farm or St. Johns Wood tube stations and 15 minutes from either Camden Town or Swiss Cottage tube stations. From any of these stops it is a 10-minute train journey into central London. Bus route 274 runs along Prince Albert Road, with a stop just south of the Site opposite Ormonde Terrace, and this bus route connects one to either Lancaster Gate in the west or the City of London in the east. By car the Site can be reached via the A41 directly off the North Circular or from the A40 Westway onto Marylebone Road from the southwest. The Site lies within walking distance of Primrose Hill, Regent's Park, St. Johns Wood and Camden Town.

HISTORIC DEVELOPMENT

Up to the 19th century the land to the north of Marylebone Road was in agricultural use. Large plots of land were owned by the Crown, the Eyre Estate and Eton College Estate. The Crown's land was turned into Regent's Park and Primrose Hill.

In 1811 the Prince Regent commissioned architect John Nash to create a masterplan for the area then known as Marylebone Park. Nash originally envisaged a palace for the Prince and a number of grand detached villas for his favourites, but when this was put into action from 1818 onwards, the palace and most of the villas were dropped. Only the terraces around the park were built, such as Park Crescent and Cumberland Terrace. This terrace was designed to stand opposite the Prince's palace within the park and was therefore of particular importance in the scheme. It was named after the King's younger brother, the Duke of Cumberland. The park was first opened to the general public in 1835.

Primrose Hill is an extension to Regent's Park, carrying the character of a *"park for the people"*. The hill lies on the north side of the park, and its name still bears testimony to its rural location, when its sides were covered with brushwood and flowers. The hill was doubtlessly famous for the primroses that grew upon it. The hill was Crown property until 1841 when an Act of Parliament changed it to public open space, and it soon became a favourite place for Londoners to enjoy themselves. A plan to establish a cemetery on Primrose Hill was quickly dropped and in 1847 an open-air gymnasium was built which still remains. The top of Primrose Hill is 63 metres or 206 feet above sea level and the view over London is now protected in planning law (London View Management Framework). Visitors can look down on the zoo in Regent's Park and further afield to landmarks such as Canary Wharf, the Millennium Dome and the Post Office Tower.

The rural character of the area was first disrupted by the railway line from Euston to Birmingham, constructed in the 1830s. Avenue Road and Adelaide Road were laid out by the middle of the 19th century. The presence of the royal parks made the area attractive for the wealthy classes. By World War I, the area had been built up. Avenue Road and the area around Elsworth Road, today's Elsworth Conservation Area (see below) were lined by large detached and semi-detached houses set in generous gardens which created a garden suburb character.

The wider area underwent fundamental change in the decades following World War II. New housing estates, large blocks of flats and low-rise terraces, were built. The Chalcot Estate, comprising the 23 storey Burnham Tower, on Adelaide Road, was completed in 1968. Swiss Cottage Library nearby, designed by Sir Basil Spence, opened in 1964. The buildings on Avenue Close were built on the land to the east of Avenue Road, introducing a new road pattern that did not align with Avenue Road nor St Edmund's Terrace.

HISTORIC DEVELOPMENT OF ST EDMUND'S TERRACE

Avenue Road was built in the mid-19th century, leading from Regent's Park northwards. Large houses lined the main roads. The block between Prince Albert Road, Ormonde Terrace, St Edmund's Terrace and Titchfield Road was developed by the end of the 19th century. Terraced houses overlooked Regent's Park and Primrose Hill. Smaller properties were built around this time to the north of St Edmund's Terrace; Nos. 28 and 28b St Edmund's Terrace still exist. The north-eastern side of St Edmund's Terrace was occupied by the Middlesex Water Works and the Barrow Hill Reservoir. The River Tyburn may have had underground springs near the Site and these are believed to have fed the reservoir. The reservoir was built in 1825. The south of St Edmund's Terrace was developed with Victorian terraces and then later residential properties. The open space of Barrow Hill and to the north was replanted over time but has essentially remained mainly open ground.

Stockleigh House was a free-standing villa, replaced in the 1930s by a large Art Deco mansion block, Stockleigh Hall. The residential blocks off Avenue Close date from the same period. Most of the Victorian terraces on Prince Albert Road were demolished and large, modern residential developments built in their place. Several historic properties survive along the central section of St Edmund's Terrace. The three pavilions at the eastern end of the road, overlooking the park, were built in 2015.



Figure 1: The Site after World War II (Source: London Bomb Damage Map, LCC)

HISTORIC DEVELOPMENT OF THE SITE

Searle House and Benjamin House stand on land which originally belonged to the garden of No. 14 Avenue Road. The plot was developed in the 1960s to provide accommodation for the elderly. Guinness Court comprised bedsits and 1-bedroom flats in two blocks of 2 to 4 storeys.

A planning application (reference number: 2010/4850/P) was approved in 2010 for:

“Erection of two buildings (4-storeys and 6-storeys) with basement to provide 64 (28 private and 36 affordable) residential units (2 x 4-bedroom, 15 x 3-bedroom, 19 x 2-bedroom, and 28 x 1-bedroom) with 29 car parking spaces (19 underground and 10 surface level), 71 cycle parking spaces, and associated landscaping (following demolition of all existing buildings on site).”

Guinness Court was subsequently demolished, and Searle House and Benjamin House built on the Site between 2012 and 2015.

TOWNSCAPE CHARACTER BASELINE

The 2010 officers' report for the redevelopment of Guinness Court summarises the area as *"characterised by large blocks of flats which vary in age, height, bulk, elevational detailing and materials, interspersed by short terraces of Victorian and more contemporary houses"*. Figures 3 and 4 illustrate the building heights and townscape character of the area.

ST EDMUND'S TERRACE

Barrie House, a post-war point block of 8 storeys, is located adjacent to the Site. Saint Christina's School to the south of the Site, is a part 3, part 4 storey post-war building. In 2013, planning permission was granted by Westminster City Council for the rooftop extension of the main building which now extends to 4 storeys. The buildings on St Edmund's Terrace and Tichfield Road range from 4 to 6-storeys in height. Danes Court at the eastern end of St Edmund's Terrace has 10 storeys, Prince Regent Court on the corner of Avenue Road is of similar height. 50 St Edmund's Terrace, overlooking Primrose Hill and completed in 2016, has up to 6 storeys. Apart from the school and adjoining convent, the predominant use in the area is residential.

We note that an objection on behalf of the Avenue Close Tenants Association identifies the site context to comprise 3-4 storeys. This is not borne out by our analysis of the site context – we draw the Inspector's attention in particular to Figure 3 which illustrates building heights in the vicinity. Searle House cannot be described as an 'outlier' in this mixed context,

The use of materials on St Edmund's Terrace is varied, comprising traditional materials such as render and brick and modern interventions such as the grey metal cladding of the school extension and the metal roofing and large glazed wintergardens of the post-modern, 1970-80s houses at the western end of St Edmund's Terrace. Regent Heights is a modern block on St Edmund's Terrace, combining the appearance of traditional mansion blocks with contemporary aesthetics. The symmetrical façade with a plinth and lightweight roof pavilion has fully glazed bays framing the central brick part, reaching from the first floor to the top. Protruding balconies and metal louvres, installed as bris-soleil, give the building a dynamic character. Nos. 7-8 St Edmund's Terrace is a 6 storey building with an expressive stepped roof and boxy dormers. It is entirely clad in fluted concrete panels. 50 St Edmund's Terrace has lightweight roof pavilions, sitting above stone clad blocks with large, glazed openings and fully glazed bay windows linking several storeys.

The images at the end of this section (A-F) show the townscape of St Edmund's Terrace, moving from Avenue Road towards Primrose Hill. The junction of St Edmund's Terrace and Avenue Road is marked by tall blocks of flats of up to 10 storeys (Prince Regent Court, image B). Image C shows the varied streetscape at the western section of St Edmund's Terrace, comprising Prince Regent's Court and the convent and school buildings behind. Image D shows the lower buildings on St Edmund's Terrace set against the tall block of Barrie House. Image E shows Searle House, set back behind Cecil Grove. Image F takes in the view from Wells Rise towards Primrose Hill, taking in the modern 6 storey buildings (50 St Edmund's Terrace). The character areas are summarised at Figure 4.

BROXWOOD WAY AND AVENUE CLOSE

There is a long block of 4-storey post-war maisonettes on Broxwood Way to the east and the 4-5 storey 1930s blocks on Avenue Close to the north. The buildings have different architectural styles, comprising modernist, Art Deco and neo-Georgian features, such as the concrete elements, curved balconies and large roofs with expressive cornices. The shared use of red brick and the repetitive elevational treatment of each block gives this part of the study area a unified character. Thick vegetation separates this area from the buildings on St Edmund's Terrace.

AVENUE ROAD

Avenue Road, located to the west, leads from Regent's Park to Swiss Cottage. The southern section near the park at the junction with St Edmund's Terrace is lined by large, mid-20th century apartment blocks, such as London House and Imperial Court, both 10 storeys tall. To the north are fine, free-standing 3 storey houses and the large scale brick blocks of Avenue Close.

SEARLE HOUSE AND BENJAMIN HOUSE

Searle House (Block A) has 6 storeys (Figure 2). However, due to the topography of the wider area, the ground floor is built into the slope, and the east elevation onto Broxwood Way has only 5 storeys (Figure 3). As a result, when seen from the northeast Searle House appears as a 4 storey building with a 1-storey roof pavilion. Benjamin House (Block B) has 4 storeys. There is a landscaped area between Searle House and Benjamin House. Tall trees and vegetation separate the Site from the properties on Avenue Close. As the Site slopes down from north to south, the only opportunity for level access is from Cecil Grove off St Edmund's Terrace.

The volume of the buildings is broken up by the rooftop setbacks and the varied elevational treatment comprising blocks in London Stock and dark blue engineering bricks, avoiding any overbearing impact on adjoining properties due to scale or size. In fact, the intermediate height of Searle House of 5 storeys helps negotiate between the much taller Barrie House and the 3 storey terrace on St Edmund's Terrace when approaching from Primrose Hill. Punched windows, timber shutters and the two-coloured bricks create a traditional appearance that is contextual and relates to the red brick character area to the northeast. The large glazed elements and the lightweight roof structure take design cues from the eclectic mix of buildings on St Edmund's Terrace.

Overall, visibility of Searle House and Benjamin is limited. Due to its position at the junction of St Edmund's Terrace, Titchfield Road and Broxwood Way, Searle House appears in the views from Titchfield Road. Benjamin House is mostly obscured by Searle House. When approaching the Site from the west, there are incidental glimpses of Benjamin House from St Edmund's Terrace between Nos. 26 and 26C. Visibility of the Site from Primrose Hill is limited to the north-eastern corner of the park, from where glimpses of the rooftop of Searle House are possible, filtered by mature trees and vegetation. Searle House is seen against the backdrop of Prince Regent Court on the corner of St Edmund's Terrace and Avenue Road and Woodmere Court on the opposite side of Avenue Road. Both are much taller buildings of 10 storeys. The viewer's eye will be drawn to the tall buildings at the junction of Edgware Road and the Westway, including the 29 storey tall Westmark Tower.



Figure 2: Searle House seen from St Edmund's Terrace.



Figure 3: Building heights



Figure 4: Character areas

SUMMARY

St Edmund's Terrace has a heterogenous character comprising stuccoed Victorian terraces, 1930s mansion blocks and a range of large-footprint apartment buildings dating from the late 20th and early 21st century. Building heights range from 3-10 storeys; the average height is around 6 storeys.

The buildings on St Edmund's Terrace display a wide range of material and design features, such as concrete elements, fully glazed sections and bay windows, metal louvres and lightweight roof extensions. There is variety in grain, but the predominant character is of large footprint modern blocks. Avenue Close and the northern section of Broxwood Way to the northeast have a more uniform character derived from the use of red brick. Searle House and Benjamin House are part of the St Edmund's Terrace character. Both the massing and elevational treatment of Searle House and Benjamin House relate successfully to the brick blocks of Avenue Close and fit into the wider townscape at St Edmund's Terrace, making a positive contribution to the surroundings.







HERITAGE BASELINE

The Site does not fall within a conservation area, and neither the building on the Site nor adjacent buildings are listed. A heritage asset map is provided at the end of this section (Figure 5).

NO. 25 AVENUE ROAD

No. 25 Avenue Road, approximately 115 m to the west, is the closest heritage asset. Listed in 1987, the villa was built in the first third of the 19th century by the Portland Estate. It is an elegant building of three storeys and basement, 3 windows wide. Sparse architectural detailing, cornices and pilasters emphasise the refined simplicity of the main façade. Set back from Avenue Road, the house stands in a long row of similar, large villas. Motor traffic on Avenue Road is intense and separates the villa from the eastern side of Avenue Road. There is no intervisibility with the Site, and Searle House and Benjamin House do not fall within, nor contribute to the asset's significance by way of setting.

ELSWORTHY CONSERVATION AREA

Originally designated in 1973 and extended in 1985 and 1991, the Appraisal and Management Strategy was adopted in 2009. The conservation area comprises the properties to the north and west of Primrose Hill, set around Waldham Gardens, Elsworthy Road and Harley Road. King Henry's Road is the northern boundary. The conservation area includes the houses on Avenue Road between Avenue Close and Elsworthy Road. The southeast corner of the conservation area lies approximately 75 m away from the Site (Figure 3, next page).

The significance of the conservation area derives from its character as a wealthy garden suburb with spacious leafy streets, generous plot sizes and large, well-designed buildings. There are terraces and semi-detached houses and a number of free-standing villas. Brick is the predominant building material, often used in combination with coloured brick, stone, tile, stucco and timber. The architectural styles are diverse, comprising Italianate buildings and Free Style late Victorian designs. Modern interventions are rare. The area retains much of its original character.

The tall buildings of the Chalcots Estate and modern development are visible from inside the conservation area and from part of its setting as is common in many central London conservation areas. The central part of the conservation area around Waldham Gardens has an introverted and enclosed character. With the exception of Elsworthy Terrace which offers views out across Primrose Hill, most views are inward looking or along the area's edges. The view along Elsworthy Terrace is highlighted in the conservation area appraisal. From Elsworthy Terrace, views through to the park are heavily filtered by the existing mature street trees lining Elsworthy Terrace and the groups of trees within the park. Despite the proximity to the south-eastern corner of the conservation area, the blocks of the Avenue Close development screen the Site entirely from it. As a result, there is no intervisibility with the Site, and Searle House and Benjamin House do not fall within, nor contribute to the asset's significance by way of setting.

PRIMROSE HILL

Primrose Hill was included in the Register of Parks and Gardens of Special Historic Interest in England at grade II in 2001. Plans had been drawn up to develop the land or establish a burial ground in the first decades of the 19th century. The Crown decided to acquire the park to create as an extension to Regent's Park. The new park opened in 1841; it is still owned by the Crown. Prince Albert Road separates Primrose Hill from Regent's Park. The other three sides are now mostly built up, with the exception of the western boundary where the covered Barrow Hill Reservoir is located.

A network of footpaths runs across the park. Primrose Hill Lodge is the main entrance from the south. The park slopes up to the north, before dropping down towards Elsworthy Road. Ornamental trees, hedges and shrubbery create a verdant character. Its character is, in short, municipal parkland in a manner typical of Victorian designs. Primrose Hill is also known as a popular place for public meetings (Figure 4, next page).



Figure 3: Tall development seen from inside the Elsworth CA.



Figure 4: The viewing point within the park.

The Site lies approximately 250 m to the west of Primrose Hill. Due to the undulating topography of the park and large mature trees, bushes and shrubs, Searle House is obscured from view in most parts of Primrose Hill, itself screening Benjamin House.

The viewing point at the top of the sloping land is a popular gathering point, offering spectacular views over London and the skyline from Canary Wharf to the City, Westminster, Vauxhall/Nine Elms and beyond. The significance of the viewpoint has been recognised by the 2012 London View Management Framework which identifies this view as a London Panorama View (LVMF 4A.1/4A.2). The LVMF states that *“the panoramic views available from the summit of the hill allow the perception of considerable detail, including the principal buildings in central London”*. The LVMF description notes that *“There is little order or prevailing character amongst the groups of large commercial buildings and tall residential buildings”*. The Visual Management guidance concentrates on the protection of heritage assets. Hence, the viewing corridors are focused on St Paul’s and the Palace of Westminster, located to the southeast of the park away from the Site. For the viewer standing at the viewpoint, Searle House is to the far right of the panorama beyond the human field of view. Turning westwards, away from the central London sights, the viewer will notice the groups of trees along the western edge of the park which screen Searle House. Benjamin house remains undiscernible.

As discussed above in the townscape character section, there is some visibility of Searle House from the footpaths along the western side of the park leading to Elsworthy Terrace. Heavily filtered by the branches of the existing trees during the winter months and almost entirely hidden from view by foliage during the summer months, the rooftop of Searle House appears behind the Camden housing block on Broxwood Way which frames the park. Searle House is seen against the backdrop of Prince Regent Court on the corner of St Edmund’s Terrace and Avenue Road and Woodmere Court on the opposite side of Avenue Road. Both are much taller buildings of 10 storeys. The viewer’s eye will be drawn to the tall buildings at the junction of Edgware Road and the Westway, including the 29 storey Westmark Tower. Searle House is an incidental element in the setting of Primrose Hill that remains largely unnoticed.

PRIMROSE HILL CONSERVATION AREA

Given the distance, vegetation and topography, Searle House cannot be seen from the Primrose Hill Conservation Area to the east of the park, and the heritage asset will not be affected by the proposed development.

ST JOHN’S WOOD CONSERVATION AREA (WESTMINSTER CITY COUNCIL)

The St John’s Wood Conservation Area comprises the properties to the west of Avenue Road, including No. 25, described above. Motor traffic on Avenue Road is intense and separates the villa from the eastern side of Avenue Road. There is no intervisibility with the Site, and Searle House and Benjamin House do not fall within nor contribute to the asset’s significance by virtue of setting.

REGENT’S PARK AND REGENT’S PARK CONSERVATION AREA (WESTMINSTER CITY COUNCIL)

Regent’s Park is grade I listed; it overlaps with The Regent’s Park Conservation Area, and is located approximately 170 m to the south of the Site. Macclesfield Bridge which leads from Avenue Road into Regent’s Park is listed at grade II; there are several other listed buildings within Regent’s Park. Regent’s Park is also designated Metropolitan Open Land.

Prince Albert Road, the Regent’s Canal and dense vegetation separate the park from the residential area to the north. There is no intervisibility and as a result, none of the heritage assets are affected by the proposals because there is no setting relationship.

SUMMARY

The only heritage asset from where the Site is visible is Primrose Hill. From the north-eastern section of the park, glimpses of the rooftop of Searle House are possible. The rooftop is seen against the backdrop of much taller buildings. Searle House is an incidental element in the setting of Primrose Hill that remains largely unnoticed and neither contributes to nor detracts from the significance of Primrose Hill.

HERITAGE ASSET PLAN

Application Site

Conservation Areas

- A. St John's Wood CA
- B. Elsworthy CA
- C. Regent's Park CA

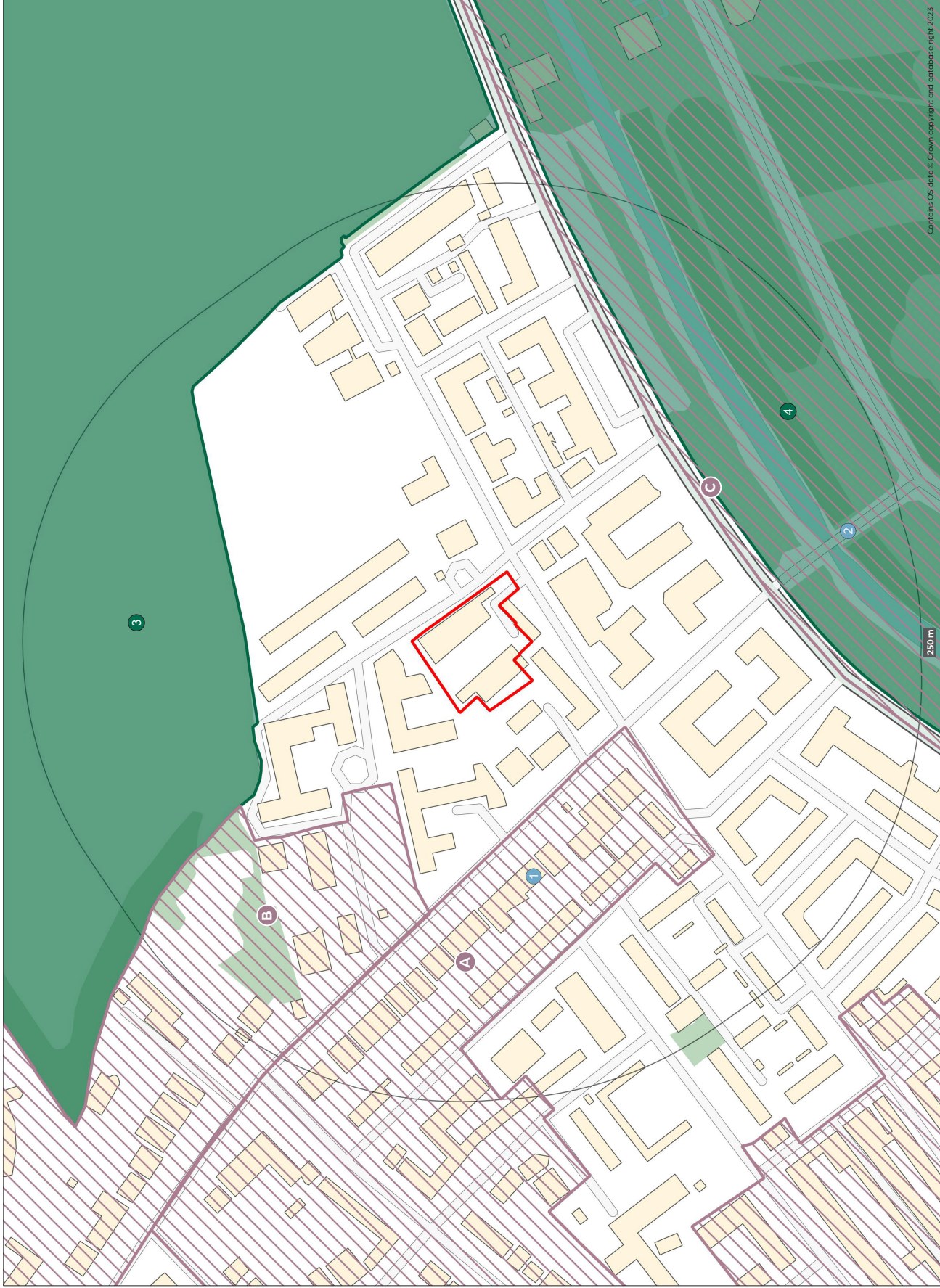
Listed Buildings

Grade II

1. 25 Avenue Road NW8
2. Macclesfield Bridge on Avenue Road Axis including North Gate

Registered Park and Gardens

3. Primrose Hill
4. Regent's Park



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LOCATION: Searle House and Benjamin House, 50 St Edmund's Terrace, NW8 7ED

DATE: May 2023

SCALE: 1 to 2,500m @ A3

FIGURE:

▲ NORTH



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TOWNSCAPE AND DESIGN IMPACT ASSESSMENT

The residential intensification and optimal use of the Site by providing six self-contained flats and high-quality design, appear appropriate in this location. The extensions are small footprints relative to the host buildings and are wholly proportionate additions. The Proposed Development comprises a one storey extension of the lightweight setback rooftop pavilions of Searle House and Benjamin House. The LVMF view (4A.1/4A.2) at Primrose Hill is not affected by the Proposed Development

The Proposed Development comprises lightweight structures that have been aligned with the existing buildings to maintain the overall proportions of Searle House and Benjamin House. The proposed glazed areas of the rooftop extensions complement the solid lower floors, achieving a successful and balanced whole, that is well integrated into the overall composition. The additions are designed in a manner which avoids changing the proportions of Searle House and Benjamin House. The robust brick bases of the buildings will still be their dominant character.

SEARLE HOUSE

The proposed additional storey, increasing the height of Searle House from 5 to 6 storeys measured from Broxwood Way is appropriate for the following reasons. To reduce visibility from and impact on St Edmund's Terrace, the additional level is recessed from the narrow frontage facing the street. The new storey will only be glimpsed from this angle and where it is visible, will appear as an interesting, stepped roof profile. The roof extension of Searle House also steps back along the east elevation on Broxwood Way, limiting visibility from Broxwood Way, maintaining the existing proportions of the building. As a consequence of the position and footprint of the extension, the Proposed Development will not be readily visible from many locations around the Site. The relationship between Searle House and adjacent Barrie House does not change, and Searle House continues to negotiate between the taller neighbour and the lower terraces nearby.

Due to the recessed design and surrounding townscape, the Proposed Development is almost entirely obscured from view. Where visible, it does not change the character of the existing building. When seen from Broxwood Way, Searle House will be understood as a 6 storey building. It will be within the characteristic range of height on St Edmund's Terrace. There are buildings of up to 10 storeys. On average, the prevailing height on St Edmund's Terrace is around 6 storeys. In other words, the modest addition of one storey is entirely appropriate in this context.

BENJAMIN HOUSE

The Proposed Development increases the height of Benjamin House from 4 to 5 storeys at Benjamin House. The building is largely screened from view by existing development, and the additional height does affect not its townscape impact or visibility. From St Edmund's Terrace, visibility is mainly limited to glimpses between the adjoining properties. The extension of Benjamin House steps away both from the neighbouring properties to the south and west, minimising its presence in the streetscape.

With 5 storeys, Benjamin House will be lower than the average height on St Edmund's Terrace and will continue to not be visible from most viewpoints. This modest addition is entirely appropriate in this context.

SUMMARY

The townscape of the area is characterised by large residential blocks of varying height, style and age, set in a verdant streetscape. The Proposed Development does not have any adverse effect on those characteristics. It is largely hidden from view given the location of Searle House and Benjamin House and the local context. Where visible, the Proposed Development is fully in line with the surrounding development, which comprises building of a similar or greater height. The extensions will only be glimpsed from the surrounding streets and will not change the character of Searle House and Benjamin House, nor of the surrounding streetscape. Where they can be seen, this is in the context of large footprint blocks of similar or greater height.

The external appearance of the buildings would be enhanced or at the very least maintained. The material is a lightweight continuation of the existing rooftop. Though recently constructed and purposively designed buildings, the design of Searle House and Benjamin House is a robust one that lends itself to adaptation.

Cumulatively, if both roof extensions were completed, this would not change our judgement.

HERITAGE IMPACT ASSESSMENT

As established above, neither the listed house at No. 25 Avenue Road, any other of the listed buildings in the study area, nor the surrounding conservation areas will be affected by the Proposed Development.

The only heritage asset from where the Proposed Development is visible is Primrose Hill, a grade II registered park and garden. The area from which glimpses of the proposed rooftop extension of Searle House will be possible is limited to the northernmost section of the footpath that leads to Elsworthy Terrace and the westernmost section of the footpath that runs along the gardens of the properties on Elsworthy Road. Mature trees obscure the view out of the park towards the west and the Site and the proposed rooftop extension of Searle House. Where there are no trees, the rooftop will be perceived above the existing block of flats on Broxwood Way as a minute addition which appears to belong to the established roofscape. The Proposed Development will be seen against the taller buildings behind, such as Prince Regent Court and Woodmere Court and the tall buildings at Edgware Road. Even during winter, branches and remaining foliage will provide some filtering. From the LVMF viewpoint at the centre of the park, the Proposed Development will remain unnoticed.



Figure 5: Searle House can be just noticed against the backdrop of taller buildings to the west of Primrose Hill.

The LVMF view (4A.1/4A.2) is not affected by the Proposed Development.

SUMMARY

There is no change to the character of the park and thus no harm to the character or significance of Primrose Hill.

POLICY COMPLIANCE

The statutory duties of the decision-maker when considering applications which affect designated heritage receptors are set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the 1990 Act').

The Site does neither comprise any statutorily listed buildings nor is it located in a conservation area. Primrose Hill is the only statutorily listed asset near the Site from where the Site is visible. However, the Proposed Development is too small to affect the asset's heritage value as a result of change to its setting.

As a result, we consider that the relevant statutory provision at Section 66(1) of the 1990 Act which states that:

"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural and historical interest which it possesses."

is not engaged as there is no prospect of the Proposed Development affecting the asset's special interest by impacting its setting. As there are no harmful effects identified to setting, paragraph 202 of the NPPF does not engage.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 stipulates that where in making any determination under the Planning Acts, regard is to be had to the development plan, and the determination must be made in accordance with that plan unless material considerations indicate otherwise. The statutory development plan includes the following matters which are relevant to the issues discussed in this report..

| Development Plan Policy | Key Provisions |
|--------------------------|---|
| London Plan (2021) | Chapter 1: Planning London's Future – Good Growth <ul style="list-style-type: none"> Policy GG2: Making the best use of Land Chapter 3: Design <ul style="list-style-type: none"> Policy D1: London's form, character and capacity for growth Policy D3: Optimising site capacity through the design-led approach Chapter 7: Heritage and Culture <ul style="list-style-type: none"> Policy HC1: Heritage Conservation and Growth Policy HC3: Strategic and Local Views |
| Camden Local Plan (2017) | Design and Heritage <ul style="list-style-type: none"> Policy D1 Design Policy D2 Heritage |

| National Policy | Key Provisions |
|--|---|
| National Planning Policy Framework (NPPF) 2021 | Chapter 12: Achieving well designed places <ul style="list-style-type: none"> Paragraph 126 Paragraph 130 Paragraph 131 Paragraph 132 Paragraph 133 Paragraph 134 Chapter 16: Conserving and enhancing the historic environment <ul style="list-style-type: none"> Paragraph 194 Paragraph 199 Paragraph 200 Paragraph 201 Paragraph 202 Paragraph 203 Paragraph 206 |

MATERIAL CONSIDERATION

In addition to legislation and policy, the assessment will take into consideration relevant planning guidance and any material considerations, including:

- National Planning Practice Guidance (online);
- National Design Guide (2019);
- Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA) (2013);
- An Approach to Landscape Character Assessment (2014);
- Visual Representation of Development Proposals Technical Guidance Note (2019);
- Historic England, Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015)
- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017);
- Camden Planning Guidance. Design (2021)

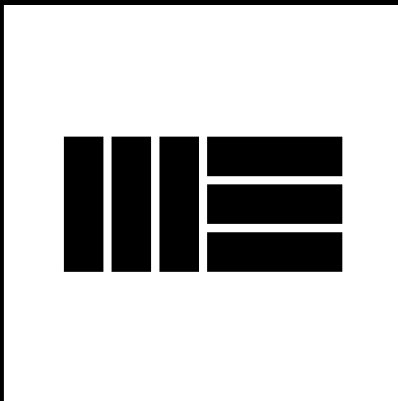
CONCLUSION

Overall, our judgement concludes that the significance of all designated heritage assets in the study area is preserved in accordance with the relevant policies of the development plan. The only heritage asset within whose setting the Site falls is Primrose Hill, listed at grade II. The Proposed Development is too small to be perceived from this asset, and therefore the proposed development causes no harm. As a result, paragraph 202 of the NPPF does not engage.

In townscape terms, the Proposed Development complements the existing buildings and the wider townscape at St Edmund's Terrace. The proposed Development is appropriate by reference to its external appearance, whether judged against the existing buildings on the site or the surrounding built environment.

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.