

Heritage, Townscape and Visual Statement: Addendum Note – Minor Revisions

100 and 100a Chalk Farm Road
London NW1 8EH

May 2024

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1. Introduction

- 1.1 This Note has been prepared on behalf of Regal Chalk Farm Limited ('the Applicant') as an Addendum to the Heritage, Townscape and Visual Statement (HTVS) previously submitted with the planning application (ref: 2024/0479/P) for:

Demolition of existing buildings and redevelopment of the site to provide two new buildings of between 6-12 storeys: one containing affordable homes (Class C3) and one (with three cylindrical volumes) containing purpose-built student accommodation with associated amenity and ancillary space (Sui Generis), a ground floor commercial space (Class E) together with public realm, access, plant installation, and other associated works.

- 1.2 The Addendum Note principally assesses the impact of minor revisions to the application proposals for redevelopment of 100 and 100a Chalk Farm Road ('the Site'). Opportunity is also taken to provide observations on stakeholder comments regarding heritage impacts of the proposals.

- 1.3 The minor revisions to the submitted application proposals (ref: 2024/0479/P) comprise:-

- Extension of the affordable housing building to the eastern site boundary and amendments to the design of the facade.
- Increase in the number of affordable homes from 24 to 30.
- Changes to the ground floor entrance to the affordable housing building.
- Internal reconfiguration of the basement including location of plant.
- Amendments to the façade of the student accommodation building.
- Reconfiguration of units in the student accommodation block to improve aspect.

- 1.4 The Development will now provide 264 student accommodation units, together with c. 1,000 sqm (GIA) of commercial space, 30 affordable residential units, with public realm improvements, new areas of landscaping, amenity and play space, and improved accessibility to the Site ('the Development').

- 1.5 Full details of the minor amendments are set out the supporting revised drawings and addendum to the Design and Access Statement prepared by DSDHA and cover letter prepared by Gerald Eve.

- 1.6 This Addendum Note should be read in close association with the full background information and the heritage, townscape and visual impact assessments set out in the previously submitted HTVS.

- 1.7 As a recap, **Section 2 (Site context and history)** provided a summary of the historic development of the Site and surrounding area; **Section 3 (Heritage assets and their**

significance) identified the relevant heritage assets – the significance of which had the potential to be affected either directly or indirectly by the application proposals.

- 1.8 **Section 4 (Townscape character and visual context)** identified and described the value of defined townscape character areas (TCA) in the study area, informed by published characterisation studies, analysis and professional judgement. The key visual receptors within the wider townscape and associated viewpoints for representative views (RV) were identified (taking account of the setting of the identified heritage assets).
- 1.9 **Section 5 (Description of development)** described the application proposals, including a summary of design development and pre-application consultation and engagement and **Section 6 (Heritage assessment)** described and assessed the impact of the application proposal on the heritage significance of the identified heritage assets taking account of their heritage significance and the relative contribution of setting.
- 1.10 **Section 7 (Townscape and visual assessment)** described and assessed the impact of the proposals on townscape character with reference to visual impacts and **Section 8 (Conclusions)** provided a summary of the conclusions from the assessments.

2. Minor Revisions

Context

- 2.1 A layered approach was adopted for the massing of the application proposals which are of varied heights ranging from 6 to 12 storeys. In summary, the proposals comprise three, interlinked, circular forms (or 'drums') of varying dimensions and heights, ranging from the North Drum of 6 storeys immediately adjacent to Chalk Farm Road and the street front of the Roundhouse, and two larger drums of 9 storeys (East Drum; adjacent to Chalk Farm Road) and 12 storeys (West Drum; adjacent to the railway line and the rear of the Roundhouse within the depth of the Site). The other building is located to the south-east of the Site, adjacent to the former petrol filling station site and set back from Chalk Farm Road behind the associated consented Youth Space and comprised 10 storeys.
- 2.2 The ground floor will be activated through proposed commercial space facing Chalk Farm Road, signalled by large, glazed openings and windows. The main residential access will be recessed between the North and East Drums facing Chalk Farm Road. Student accommodation is provided at the upper levels within the building together with an external roof terrace on the North Drum. The building to the south-east of the Site will provide affordable residential units.

Design Revisions

- 2.3 Full details of the minor revisions are set out in detail in the addendum to the DAS and the revised application drawings and plans prepared by DSDHA. The minor revisions have also been remodelled in the verified views by visualisation consultants AVR London. In summary, and with specific respect to potential effects on heritage and townscape considerations, the revisions comprise:

Affordable housing building – design development of footprint and internal plan form of the building to extend its envelope to the east site boundary. Internal reconfiguration, including relocation of the stair core and a lowering of floor to ceiling heights of ground and first floors, is reflected in changes to the façade.

This now comprises a brick clad end bay or 'book end' to the east of the building and an associated evolution of the bay rhythm/grid of the facades with revised balustrades. Profiled terracotta panels are used at the window heads on the bays in the curved façade to the west.

At the upper level, the previous plant enclosure is replaced by an affordable housing unit with an associated minor lift overrun (to bring the fire-fighting lift to that level). The circumference of the curved element of this building has a 'crown' – a visually lightweight structure – to complement to those on the adjacent student housing building. The entrance to the building is also revised and enlarged, within a stepped brick portal, to be more legible and distinct.

- 2.4 **Student housing building** – within the envelope of the previously submitted massing and form, minor revisions are proposed to the arrangement of the façades. This includes

altered terracotta header panels to the windows, increasing the vertical emphasis of the window bays to each cylinder, and clarity on the variation in tone to the terracotta panelling between each cylinder. The brick plinth/bases to the drums/cylinders are also revised to incorporate corbelled brick head detailing around their perimeter.

- 2.5 In summary, the proposals result from evolution of façade design across both the affordable and student housing buildings and the opportunity taken to increase the number of affordable housing units. Other than a minor increase in height from the lift overrun and associated lightweight 'crown' to the affordable housing building, massing and form remains as previously submitted.

3. Impact Assessment

Context

- 3.1 In the previously submitted Heritage, Townscape and Visual Statement the likely effects of the application proposals on heritage significance, townscape character and associated visual receptors were identified and assessed.
- 3.2 That assessment was informed by desktop and field study, including a review of relevant built heritage and townscape/landscape designations, visual receptors and views; relevant legislation, national and local planning policy; relevant published sources; and baseline assessment of the value and importance of the relevant built heritage, townscape/landscape and visual receptors. That baseline work informed the assessment of the potential impact of the application proposals on the relevant heritage assets, townscape/landscape character areas, visual receptors and representative views.
- 3.3 It was concluded that:
- Insofar that the Site is an element of setting, the overall heritage significance of the Primrose Hill Conservation Area, the Grade II* listed Horse Hospital, the Grade II listed Chalk Farm Road Underground Station, Drinking Fountain and Cattle Trough, and the locally listed buildings Nos. 36—37 Chalk Farm Road and No. 2 and Nos. 45—47 Crogsland Road, will be sustained.
 - There will be no/neutral to beneficial impacts on the townscape character of the identified Townscape Character Area 2 (North of Chalk Farm Road), 3 (Primrose Hill) or 4 (Belsize Park), meeting the objectives of Development Plan policies regarding strategic and local views and good design appropriate to surroundings.
 - The application proposals have been designed to respond positively to the character of the surrounding townscape in terms of disposition of massing, material palette and architectural articulation. The proposals constitute buildings of high-architectural quality to transform the Site, which otherwise detracts from the townscape and this part of the Regent's Canal Conservation Area.
 - Architectural form and materials reflect wider townscape characteristics and facilitate substantial improvements to the public realm and the activation of the street scene, including the setting of the Roundhouse as a major entertainment venue. In these terms, the application proposals will have a substantial beneficial effect on the townscape character of TCA1 (Regent's Canal and Rail Interchange).
 - The application proposals will deliver heritage benefits through removing the existing building and its damaging connection to the Grade II* listed Roundhouse, providing new development composed to better reveal its external form and significance and providing for an activated and engaged street scene to this part of the Regent's Canal Conservation Area.
 - In these terms, the application proposals are consistent with s66(1) and s.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, meet the

objectives of NPPF policy with respect to the historic environment and address Development Plan policies regarding heritage.

- Notwithstanding the heritage, townscape and visual benefits, the application proposals will, through realising positive transformation change to the Site, cause some minor, less than substantial harm to the heritage significance of Regent's Canal Conservation Area and the Grade II* listed Roundhouse.
- The application supporting material demonstrates that opportunities have been taken to minimise that heritage harm through siting, layout and detailed design, whilst maximising the opportunities for enhancement.

3.4 In context of legislation and national and local policy, the resultant limited, less than substantial harm, must be accorded considerable weight and importance in the planning balance, and must be weighed against the public benefits provided by the proposals (NPPF paragraph 208).

3.5 The public benefits delivered by application proposals set out in the application documents are concluded in the Planning Statement prepared by Gerald Eve, to decisively outweigh that harm. Overall, the application proposals constitute a well-conceived scheme for transformational and regenerative change to the Site and its heritage and townscape context.

Revised Proposals – Heritage and Townscape Impacts

3.6 As set out in the previously submitted Planning Statement and DAS, the application proposals provide the opportunity for positive transformational change of the Site, aligned with specific policy objectives for the area. That transformational change will provide a new and changed relationship between the Site and the identified built heritage assets.

3.7 The revised proposals result from feedback from officers and evolution of façade design across both the affordable housing and student housing buildings together with the opportunity taken to increase the number of affordable housing units.

3.8 Other than a minor increase in height from the lift overrun and the crown added to the affordable housing building, massing and form remains as previously submitted.

3.9 The evolution of well-considered design and detailing will further enhance the overall design and visual qualities of the proposals, whilst increasing the number of affordable housing units. Insofar as the proposed revisions affect the external form and appearance of the application proposals, the overall impact on heritage significance and setting and townscape and visual context, will to a degree, be further improved.

3.10 The minor increase in the lift overrun and the new crown to the affordable housing block is largely not apparent in the wider townscape and visual context, confirmed by re-modelling of the application proposals with the minor revisions, by AVR London (ref: Verified Views, Chalk Farm Road, Camden, May 2024). All verified views from the Heritage Townscape and Visual Statement have been remodelled, together with updates to the additional views from the Design and Access Statement.

- 3.11 In the majority of these views, the minor lift overrun and new crown to the top of the affordable housing building is not apparent within the overall massing of the proposals, in context of local townscape character and cumulative proposals. There is no perceptible change to the impact on LVMF View 2A.2.
- 3.12 Closer-to, for example in Views 04 and 05 from Chalk Farm Road (looking southeast), the new crown to the affordable housing building is visible as an additional lightweight structure against the sky, matching the crowns to the cylinders that form the student housing building.
- 3.13 In View 06 from Chalk Farm Road (looking west), the revised design and detailing of the affordable housing building together with the rooftop crown are visible – the latter again appearing as a lightweight structure against the sky, matching the rooftop detailing of the elements that comprise the student housing building. This view will change with the construction of the consented proposals for the adjacent former petrol filling station site.
- 3.14 In the revised views from the DAS (VP1 to VP4) the revised and improved detailing and materiality of both the affordable housing and student buildings is evident.
- 3.15 The revised design, clarification on materials and amended detailing of the buildings further strengthens their relationship one to another and to their wider heritage and townscape contexts, whilst allowing for an important and beneficial increase in the number of affordable housing units provided on the site.

4. Stakeholder Comments

- 4.1 Observations are provided on stakeholder comments received from Historic England (Consultation letter response 4th March 2024), the Greater London Authority in respect of heritage matters (Stage 1 Report, 5th April 2024) and the Primrose Hill Conservation Area Advisory Committee (Primrose Hill CAAC, consultation response 9th January 2024). Comments were also received (20th April 2024) querying the technical accuracy and extent of visualisations submitted with the application proposals.
- 4.2 This response should be read in context of commentary on the extensive pre-application engagement set out in the HTVS and the Statement of Community Engagement submitted with the planning application.

Historic England

- 4.3 We note that Historic England supports the principle of development of this site, noting it can contribute towards a thriving part of Camden Town, celebrating its unique industrial heritage.
- 4.4 Historic England has some concerns about the impact of the proposals on surrounding heritage assets, in townscape views of the most significant historic buildings and in the change to the experience of Chalk Farm Road. Such harm, as in our assessment, is found by Historic England to be low in the range of less than substantial (in the language of the NPPF). This harm falls to then be weighed against the public benefits that will accrue from the transformative regeneration of this site.
- 4.5 Historic England urge that proposed increase in height and bulk, that would cause harm needs to be justified, including exploration of ways to avoid it. As set out in the planning application supporting information and particularly in the DAS, the proposals have been carefully evolved, testing height and mass, to ensure least impact, whilst realising the opportunity that redevelopment of the site will bring.
- 4.6 Reference is made to kinetic studies of impacts in the public realm experience of the Roundhouse and the conservation area. We note that an extensive range of townscape views have been accurately modelled to illustrate the impact of the application proposals together with a range of other views and illustrations in the DAS, sufficient to illustrate the impact of the proposals in the public realm.
- 4.7 Specific reference is made to ‘potentially’ significant views of the Roundhouse from within the nearby Goods Yard development. However, we note that earlier development and then redevelopment of this site has largely severed any functional use relationship with the Roundhouse. Together with emerging proposals for the redevelopment of Juniper Crescent, a wider pattern of change according with the objectives of the planning framework for the area, is further changing this townscape context. Such views, insofar as they are being formed by new development of the Goods Yard site, are not significant in terms of illustrating the heritage significance of the Roundhouse as found today.

GLA

- 4.8 We note that the GLA consider that, aligned with our assessment, the proposed demolition of the existing building causes no harm to the conservation area and that

demolition of the remaining parts of the former Goods Yard wall on this site, causes a very low level of less than substantial harm to the conservation area. The GLA confirm that this harm is justified and that reuse of the bricks is proposed and an indication of its former location in hard landscaping through a line of brickwork in the pavement and this is supported. The GLA also note that demolition of the modern steps between this site and the Roundhouse are a modest enhancement of that listed building.

- 4.9 The GLA also consider that proposed buildings of 6, 9, 10 and 12 storeys, with three of the four buildings in a cylindrical form, with a circular plan, to be a successful response to the challenge of building adjacent to The Roundhouse.

Primrose Hill CAAC

“3...We have taken account of Gerlad Eve’s letter of 9th January 2024 responding to our pre-app response of 27 September 2023, and comment that the harm to heritage assets needs to be assessed cumulatively, across all affected heritage assets, not piecemeal. We advise that the current proposals would cause substantial cumulative harm to a major group of recognized heritage assets in the heart of Camden”

- 4.10 The heritage assets likely to be affected by the application proposals have been scoped, identified and their significance assessed in the submitted Heritage Townscape and Visual Statement. Impact, in terms of potential harm to heritage significance, or to the contribution made by setting to that significance, is assessed in respect of each heritage asset, noting that heritage significance can overlap – for example, the setting of listed buildings within a conservation area. Overall conclusions are drawn and the approach, according with best practice in meeting planning and heritage policy objectives, is evidently not ‘piecemeal’. Whilst ‘substantial harm’ is alleged to be caused by the proposals, such a level of harm is set at a very high bar, rare, and such that the significance of the relevant heritage asset is largely drained away or lost. Clearly, this is not the case here – or indeed anything close to that – instead, any harm that may arise would be minor and within the less than substantial harm spectrum set out by national planning policy.

“5...The circular plan form of the Roundhouse, its scale, massing, and its roof form are, taken together, exceptional, clearly distinctive. This special distinction would be significantly diminished by the application’s proposed circular plan form towers, which crowd the Listed structure and diminish the significance of its massing and of its roof form by towering above it...”

- 4.11 Whilst part of the heritage significance of the Roundhouse is derived from its external form, the greater part of its significance is appreciated internally. Its external form is powerfully robust and existing consented and proposed development has and is changing the building’s wider townscape setting, without undermining its external form. The application proposals form a further element in the backdrop of the evolving townscape context of the building, with a design that celebrates the Roundhouse’s plan form.

“6. The proposed development also very substantially harms the setting of the Roundhouse...the loss of the line of the wall marking the boundary of the Goods Yard....and its replacement by ‘left over’ spaces between the rear of the footway to Chalk

Farm Road (with its own Listed feature) and the proposed towers, substantially destroys the townscape meaning of the wall...

- 4.12 Whilst it is acknowledged that some limited, less than substantial harm, is likely to be caused by the loss of the altered remains of this short section of the wall, its removal allows for a significant improvement to the public realm setting of the Roundhouse to the benefit of its now pre-eminent use as a cultural entertainment venue. Landscaping proposals seek to retain the memory of the wall, whilst creating new, accessible public realm, that will enhance the setting of the Roundhouse and the appearance of this part of the conservation area.

Paragraphs 7 to 11 and impact in views

- 4.13 Assessment of the impact of the application proposals in key views, including View 2 from the LVME, is undertaken in the Heritage Townscape and Visual Statement with reference to a series of accurate visual representations (AVRs). In each view the impact of the proposals on townscape character and heritage setting is assessed, both individually and in context of other cumulative impacts, and no adverse impacts identified. As such the impact of the proposals on 'local sensitivities' has been robustly tested. Specific reference is made to the view from Fitzroy Road (within the Primrose Hill Conservation Area) which is included from two viewpoint locations in the Heritage Townscape and Visual Statement. In these views the application site is distant from the conservation area, beyond extensive sidings and railway lines and the application proposals, where visible, do not harm the character and appearance of the actual conservation area itself.

Comments dated 20th April 2024

- 4.14 Substantial harm to the setting of listed buildings and the Regents Canal Conservation Area is perceived due to the height of the application proposals. We refer to comments above regarding the harm spectrum set out in national planning policy and the assessment of impacts on heritage significance in the Heritage Townscape and Visual Statement. Notable also, are the comparable assessments of harm to significance by Historic England and the GLA, quantified at the 'low end' of the less than substantial part of the harm spectrum in the NPPF.
- 4.15 The 'visualisations' are also perceived as being 'selective' and 'mis-leading'. However, each of the 16 viewpoints selected for accurate visual representation was chosen in context of prevailing guidance on best practice, site and field survey, and then agreed with officers during the extensive pre-application process. The technical methodology used in the production of those accurate visual representations (AVRs) is set out by the visualisation consultant in the appendix to the HTVS.

Conclusion

- 4.16 In conclusion, the findings of the Heritage Townscape and Visual Statement are sound and based upon robust technical methodology and professional judgement.

5. Summary and Conclusions

- 5.1 This Addendum Note to the Heritage, Townscape and Visual Statement (HTVS) is prepared on behalf of Regal Chalk Farm Limited ('the Applicant') and assesses the likely impact of minor revisions to the application for full planning permission for the redevelopment of 100 and 100a Chalk Farm Road ('the Site').
- 5.2 The revisions to the submitted application proposals comprise:-
- Extension of the affordable housing building to the western site boundary and amendments to the design of the facade.
 - Increase in the number of affordable homes from 24 to 30.
 - Changes to the ground floor entrance to the affordable housing building.
 - Internal reconfiguration of the basement including location of plant.
 - Amendments to the facade of the student accommodation building.
 - Reconfiguration of units in the student accommodation block to improve aspect.
- 5.3 The Development will now provide 264 student accommodation units, together with c. 1,000 sqm (GIA) of commercial space, 30 affordable residential units, with public realm improvements, new areas of landscaping, amenity and play space, and improved accessibility to the Site ('the Development').
- 5.4 The evolution of design and detailing will further enhance the design and visual qualities of the proposals, whilst increasing the number of affordable housing units. Insofar as the proposed revisions affect the external form and appearance of the application proposals, the overall impact on heritage significance and setting and townscape and visual context, will, to a degree, be improved. The minor increase in the lift overrun and rooftop crown to the affordable housing block is largely not apparent or legible in wider townscape and visual context. Where visible, in closer-to views, the crown appears as a lightweight structure, matching those of the elements that comprise the student housing building.
- 5.5 The previous overall finding of limited, less than substantial harm, in context of legislation and national and local policy, remains valid and must be accorded considerable weight and importance in the planning balance, and must be weighed against the public benefits provided by the proposals (NPPF paragraph 208). This now also includes the provision of a greater number of affordable housing units.
- 5.6 Overall, the application proposals, as revised, constitute a well-conceived scheme for transformational and regenerative change to the Site and its heritage and townscape context.

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