

Application No:	Consultees Name:	Received:	Comment:	Response:
2024/0479/P	Richard Simpson for Primrose Hill CAAC	30/06/2024 18:30:53	OBJ	<p>PRIMROSE HILL CONSERVATION AREA ADVISORY COMMITTEE 12A Manley Street London NW1 8LT</p> <p>19 June 2024</p> <p>100 + 100A Chalk Farm Road, adjacent to Roundhouse: 2024/0479/P REVISED SCHEME</p> <p>1. The Primrose Hill Conservation Area Advisory Committee reviewed the revised scheme at its meeting on 19 June 2024. The review included Turley Heritage's Heritage, Townscape and Visual Statement: Addendum Note – Minor Revisions, dated May 2024, and the two relevant letters of advice from Camden's Design Review Panel. We noted with regret that Historic England's advice, which Turley's Note discusses at 4.3-4.7, appears not to have been made available to the public including interested parties and stakeholders in the local community. This is a prejudicial lack of transparency.</p> <p>2. Turley's Note (at 1.3) identifies the revisions to the application scheme as 'minor', and we largely agree. They do not address our criticisms, and our strong objections dated 3 April 2024 stand.</p> <p>3. Turley's Note (at section 4) discusses the assessment of the degree of harm to the heritage assets, especially the Roundhouse and its setting which would be caused by its proposals. The applicant accepts that its proposals will cause less than substantial harm to the surrounding heritage assets (Turley's Note 4.3, 4.8). They then seek to show that the public benefits of their scheme outweigh the less than substantial harm to heritage assets.</p> <p>4. The PHCAAC rejects this assessment of the level of harm and, further, also rejects the assessment of the weight to be given to counterbalancing public benefits.</p> <p>5. For the sake of brevity we do not repeat our 3 April 2024 advice, but comment on the issues raised by the revised scheme and supplementary documentation. We append our 3 April 2024 advice for convenience.</p> <p>Heritage issues: the Roundhouse itself – assessing its significance</p> <p>6. The circular plan form of the Roundhouse, its scale, massing, and its roof form are, taken together, exceptional, clearly distinctive. These architectural forms are significant as representing the major importance of railway engineering in nineteenth-century Britain. Early nineteenth-century British railway engineering had been compared by contemporaries to the wonders of the ancient world. By its scale and mass alone the Roundhouse also expressed the dominance of such buildings in comparison to its context of predominantly 3-4-storey domestic buildings. The dominance of these railway buildings expressed the economic power of the railways but also the innovation on which their growth depended.</p> <p>7. The exceptional and distinctive dominant scale and form of the Roundhouse, and its significance, would undoubtedly be diminished by the application proposals which would crowd it and tower over it. The Roundhouse would lose its dominant scale and form in the street, and what that dominant scale and form signifies would be diminished. Its historic and architectural significance would be drained away. This is substantial harm.</p>

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8. This loss can be identified in the street – Chalk Farm Road – but can also be found in broader views: this further reinforces the significance of the mass and form of the Roundhouse in its larger context. This is the basis of the significance of the views from the end of Fitzroy Road in the Primrose Hill conservation area.

9. In this view the mass and forms of the Roundhouse appear above the enclosure of the Goods Yard as a historic reminder of one of the developments in urban space in the mid-nineteenth century. Parallel to the industrialization, of which the railways were a part, the concern for public health also stimulated attempts to improve access to fresh air and open space. One of these public parks was Primrose Hill (opened 1841).

10. Views of the Roundhouse as seen from the end of Fitzroy Road contrast with the views of the Hill itself, also as seen from Fitzroy Road, the green space of the Hill compared to the industrial townscape of the railway yards which define the north-eastern boundary of the Primrose Hill conservation area. These views are key elements in defining the character of the conservation area, demonstrating the historical origins which help define our townscape today.

11. Turley, in their Note 4.13, suggest that the railway lines and extensive sidings diminish the importance of the views of the Roundhouse from the end of Fitzroy Road, but this is a misunderstanding, the historic railway and its Yard and the contrast with the green space were part of the historic development of the Primrose Hill area.

12. We note the recognition of the importance of these views in Camden's 'Building heights study, Final report' (dated January 2024) which we reference at our April advice at 8-10.

13. The application proposals would diminish the significance of this view of the Roundhouse, its historic and architectural significance would be further drained away, reinforcing the substantial harm identified at our 6-7 above.

14. We argued in April (at 6) that the proposed development would also very substantially harm the setting of the Roundhouse, and the associated and related surviving elements of the Goods Yard, in particular the line of the wall marking the boundary of the Goods Yard.

15. The wall provided an important separation of the working Yard from the street. This separation was a key element in defining the Camden Goods Yard in the surrounding townscape. It is of special importance in Chalk Farm Road from Stables Market to the junction of Chalk Farm Road and Regent's Park Road. While sections of wall have been lost sufficient elements of it survive to convey the line of enclosure along the Chalk Farm Road.

16. The present proposals, including the landscape proposals for the space arbitrarily left over by the over-crowded and rigid geometry of the proposed towers would substantially diminish the townscape meaning of the wall and the special environment within the historic enclosure – the significance of the asset drained away.

The assessment of public benefit

17. In our advice of April 2024 we argued that the public benefits from this application were inadequate to

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outweigh the harm to heritage assets. This clearly remains true of the revised scheme. We summarize briefly here.

18. Affordable housing – the addition of 6 units to the original 24 is a meagre response. We note that we argued (at our April advice 14) that:

Camden's emerging Local Plan 2024 Site Allocation C9 (CGY4), gives an indicative capacity for this site of 100 additional homes, suggesting a minimum of 50 additional affordable homes. The affordable housing proposed by the application marks a lost opportunity and constitutes a public loss rather than a benefit.

19. Public open space – in addition to the harm caused by an inappropriate landscape design, we noted (at our April advice 15-16) that the open space proposed is insignificant in quantity, liable to abuse, poorly naturally lit, and badly affected by wind microclimate. Again, the application marks a lost opportunity and constitutes a public loss rather than a benefit.

20. Daylight and sunlight harm to neighbours (our April advice, 17-18). We are concerned to see no response to concerns about significant negative impacts on existing Camden residents.

Design

21. We note that Camden's Design Review Panel has made repeated requests for lower and less crowded buildings, avoiding an overbearing feeling on the street. We are dismayed that Camden's expert panel on design appears to have been ignored, even, in the latest revisions of the scheme, with a proposed increase in bulk and height.

Conclusions

22. Camden has had a successful record of defending local heritage as valued by local communities and as a result achieving admired regeneration schemes. We note both the Kings Cross development where a series of historic buildings – initially defended by the community – are now seen as key to some of the most successful aspects of the wider development. We also note the success of the Hawley Wharf scheme, not only in terms of the historic Canal but also in the real public benefits achieved. The present application needs radical review and substantial revision based in a better understanding of the local heritage and of local communities.

23. We advise that the current proposals would, by reason of their scale, massing, footprint, forms, and details, neither preserve nor enhance the character and appearance of the conservation area which includes the Listed Roundhouse, and the neighbouring conservation areas. The revised proposals would cause a range of harm to the heritage assets, including substantial harm. The public benefits of the proposals do not adequately outweigh the harm to heritage assets.

Richard Simpson FSA
Chair PHCAAC.

PRIMROSE HILL CONSERVATION AREA ADVISORY COMMITTEE
12A Manley Street London NW1 8LT

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03 April 2024

100 + 100A Chalk Farm Road, adjacent to the Roundhouse: 2024/0479/P

Strong objections

1. The PHCAAC reviewed the application scheme at its meeting on 20 March 2024. A draft of this advice was circulated before our 03 April 2024 meeting, when our advice was finalized and agreed. The PHCAAC had taken part in pre-app presentations of the emerging scheme, attending Camden's Development Management Forum on 7 September 2023, and Regal's presentations on their current proposals on 13 and 16 September 2023. The Committee discussed the proposals at our meeting on 27 September and agreed to submit a pre-app response strongly objecting to the proposals presented at that stage.

2. The PHCAAC first addresses the heritage issues raised by the proposals, but also questions the claimed public benefits of the application given that these claimed benefits are used to outweigh harm done to heritage.

Heritage issues

3. The PHCAAC advises that the proposals would be seriously harmful to several key aspects of the special significance of the Roundhouse itself and its context. This context includes the Regent's Canal Conservation Area itself, but also the Primrose Hill Conservation Area, and Eton Conservation Area. We have taken account of Gerald Eve's letter of 9 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. The Roundhouse itself is a key Listed Building (Grade II*) in the Regent's Canal CA, and it has wider significance in terms of the broader area, including neighbouring conservation areas, such as Eton and Primrose Hill. But because of its plan form and roof profile, it has developed an iconic significance as a marker of Camden itself. It exemplifies both a past – the railway heritage – which was key to the development of Camden, and buildings where form followed function in a precursor to modernist aspirations.

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. The proposed towers are inappropriate in form and mock rather than celebrate the robust dignity of the Roundhouse itself. They appear to refer (see applicant's 'Design Evolution' statement 3.5.1 at p. 69) to the gas holders at King's Cross. But this is a misleading reference: there was no gasworks at the Goods Yard. The proposals diminish the special distinctive quality of the Listed Building in its context.

6. The proposed development also very substantially harms the setting of the Roundhouse, and the associated and related surviving elements of the Goods Yard. The loss of the line of the wall marking the boundary of the Goods Yard – part of what is known as the 'Camden Wall' – 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, which by enclosing the working Yard, helped distinguish it from the street (Chalk Farm Road), and contributed to the definition of the character of the area. The proposals further disintegrate the Roundhouse from its context – the Goods Yard – while also substantially harming the surviving boundary which is significant as a defining element of the historic Goods Yard.

7. The Roundhouse also plays a significant role in longer views in the wider area. In the Primrose Hill CA

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views of the Roundhouse from Fitzroy Road are formally acknowledged as significant (Primrose Hill Conservation Area Statement (current SPD) at pp. 15-16). They are contrasted with the views of the Hill itself, also as seen from Fitzroy Road, the green space of the Hill compared to the industrial townscape of the railway yards which define the north-eastern boundary of the Primrose Hill conservation area. These views are key elements in defining the character of the conservation area, demonstrating the historical origins which help define our townscape today.

8. The PHCAAC draws attention to the weight given to these views and urban context in the Council's 'Building heights study, Final report' (dated January 2024). Assessing the application site (identified in the Study as AS06-04), the study, at p. 179, states that the site is a 'Sensitive environment, situated within Regents Canal CA, amidst smaller scale intricate townscape along Chalk Farm Road, and adjoining / in views towards Grade II * listed Round House and Camden Market. Very large or tall buildings would be overly dominant, detracting from views and be out of character.' We fully agree with this professional assessment.

9. We also note that (also p. 179) the Study proposes a height limit on this site at 5 to 9 storeys – as opposed by the application which is for buildings of 6 to 12 storeys. The Study further shows that buildings above 8 storeys (24m) on this site should be tested against 'local sensitivities' referring to site AS06-02. At that location, the Study states (p. 178) that these sensitivities include

- Conservation Areas CA Regents Canal, CA Primrose Hill, CA Harmood Street;
- Round House, Camden Market, other listed and locally listed buildings
- Sensitive townscape along Chalk Farm Road and Camden Market
- LVMF Views 2B.1 Parliament Hill oak tree to Palace of Westminster, 2A.2 Parliament Hill summit to the Palace of Westminster, and 6A.1 Blackheath Point to St Paul's Cathedral
- Local Views from surrounding streets including Haverstock Hill towards the Round House and Primrose Hill Conservation Area and Primrose Hill
- Residential amenities and outdoor spaces of existing housing.'

We note that these sensitivities should apply to 3 of the proposed 4 towers.

10. We further note that under 'Design Criteria' on site AS06-02 (referenced by AS06-04) pp. 178-79, the Study states unambiguously

'The open view at the end of Fitzroy Road (part of Primrose Hill CA) is a characteristic feature that should be preserved by development.'

We fully agree with this professional assessment.

11. We also note that Camden Local Plan (2017) Policy D2 e states

'The Council will: ... e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area ...'.

We have demonstrated that the proposals neither preserve nor enhance the character and appearance of the conservation area as Camden justly requires.

The assessment of 'public benefit'

12. We are concerned that the applicant's claim that the harm to heritage assets they propose is outweighed by public benefits of the scheme.

We dispute their assessment of public benefit. Given the trade-off for harm to heritage these issues are relevant to heritage considerations.

13. The major public benefit we would expect to see from a development of 265 homes is a substantial number of affordable dwellings. What is proposed is a meagre 24 affordable dwellings. This does not provide an adequate public benefit from this site. We note the expectation in the London Plan that in developments such as proposed here affordable homes should constitute 50% of the development, and we further note that

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Camden's emerging Local Plan 2024 at Policy H4 D applies this policy to developments of purpose-built student accommodation.

14. Camden's emerging Local Plan 2024 Site Allocation C9 (CGY4), gives an indicative capacity for this site of 100 additional homes, suggesting a minimum of 50 additional affordable homes. The affordable housing proposed by the application marks a lost opportunity and constitutes a public loss rather than a benefit.

15. The provision of green open space might be claimed as a public benefit, but the limited and constrained publicly accessible open space on Chalk Farm Road provided is insignificant in quantity and, due to its design in relation to the Chalk Farm Road, liable to abuse which would severely limit its use by children and by the elderly. Daylight and sunlight studies suggest poor levels of natural light limiting the viability of a mixed ecology of plants.

16. The submitted wind microclimate analysis demonstrates that the proposed public open space adjacent to the Roundhouse will suffer from wind conditions that would make a significant proportion of it uncomfortable for sitting. The poor wind conditions in combination with the poor light conditions will result in a low quality public space: scarcely a public benefit.

17. The 'Daylight and Sunlight Report' prepared by Consil (January 2024) raises further concerns. They examine the potential impact of their proposals on the properties on the Chalk Farm Road opposite the site, 65-77 Chalk Farm Road consisting of some 25 dwellings. They also examine the potential impact on properties within the Juniper Crescent estate, where a further 25 dwellings will suffer loss of light, bringing the total estimated number of impacted homes to 50.

18. In the case of 9 of the flats at The Chalk House, 74-77 Chalk Farm Road, acceptable levels of natural light could only be achieved by assuming that the balconies and brise soleil on the existing building are removed. That is, balconies which provide private amenity space consistently with Camden Local Plan (2017) 7.23, and a means of reducing over-heating, as provided for at Camden Local Plan (2017) Policy CC2 d, would need to be abandoned to achieve adequate levels of natural light to existing dwellings and their community of residents. This demonstrates a significant negative impact on the quality of life of existing Camden residents.

19. It is clear that the current proposals would, by reason of their scale, massing, footprint, forms, and details, neither preserve nor enhance the character and appearance of the conservation area which includes the Listed Roundhouse, and the neighbouring conservation areas. The current proposals would cause a range of harm to the heritage assets, including substantial harm. The public benefits of the proposals do not adequately outweigh the harm to heritage assets.

Chair PHCAAC.