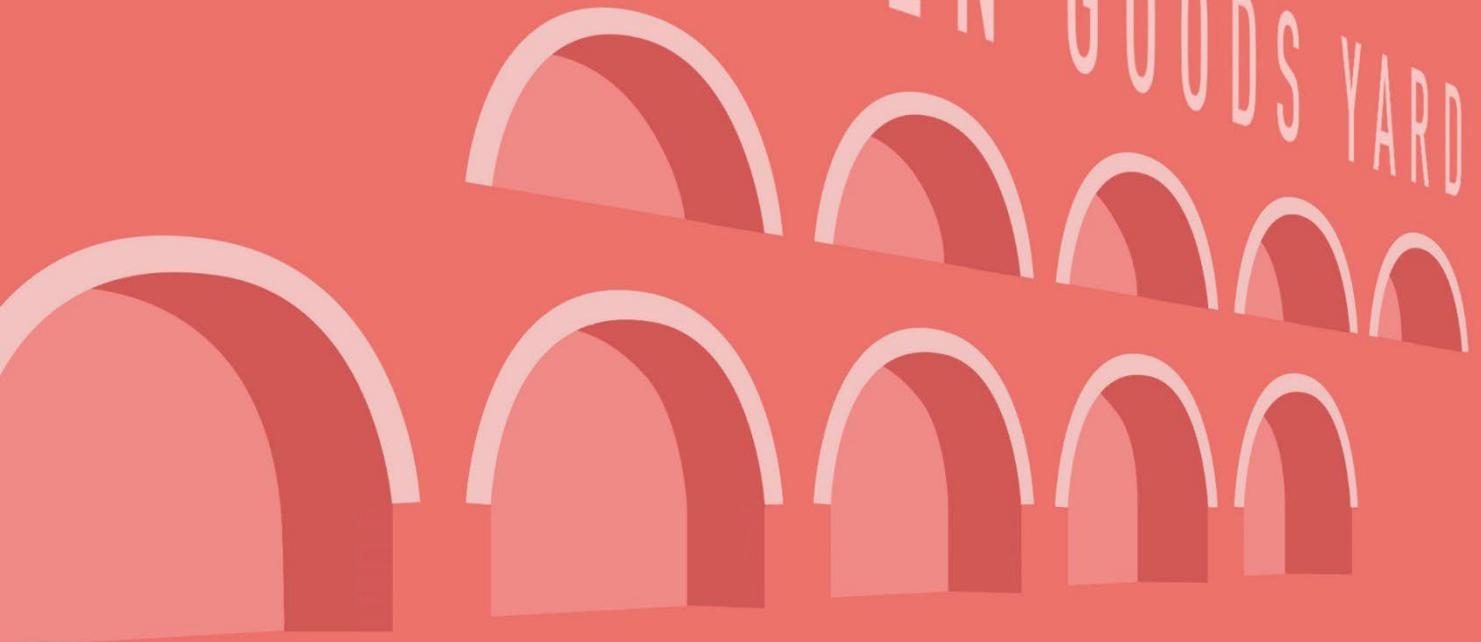


CAMDEN GOODS YARD



CAMDEN GOODS YARD HERITAGE STATEMENT ADDENDUM

March 2025

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Client

St George West London Limited

Our reference

STGH3003

March 2025

1. Introduction

Purpose of this Report and Context

- 1.1 This Heritage Statement Addendum has been prepared by Turley Heritage on behalf of St George West London Limited ('the Applicant'), to assess the built heritage impacts of the proposed s73 application to vary the extant planning permission for the Camden Goods Yard project. The Planning Statement provides the full description of the proposal.
- 1.2 This s73 application comprises the proposed amendments in respect of Blocks C, D, E1, E2 and F of the Main Site Parcel, identified in the detail within the accompanying DAS Addendum and identified here for ease of reference:
- Insertion of secondary stairs to Blocks C, E1 and F in accordance with fire safety guidelines for residential buildings.
 - Reduction of affordable housing from 38% to 15% by habitable room (from 203 to 83 homes).
 - Minor tenure and unit mix changes to approved plans.
 - Marginal increase to footprint of Block E1 (0.5m on the east, west and north elevations) to accommodate a secondary staircase.
 - Minor reduction in heights of Blocks C, D, E1, E2 and F.
- 1.3 The following conditions attached to the Operative Permission control development and are the subject of this S73 Application:-
- Condition 3, 4 and 6 - approved drawings and documents – these contains drawings which identify affordable homes (references amended) and new drawings are submitted to comply with fire regulations including a second stair core introduced into Blocks C, E1 and F and associated changes.
 - Condition 5 - contains drawings which identify affordable homes (references amended). The condition also refers to the 'affordable housing statement (June 2017)' which is amended.
 - Condition 73 refers to '203 affordable' homes. This will be revised to '83 affordable homes'. The condition also refers to a total of 27,983sqm GEA of non-residential floorspace. This is revised to 28,792 sqm, a de minimis increase of 809 sqm following re-measurement of the scheme and marginal building footprint increase to building E1. We also note that the 2,769 sqm of ancillary floorspace (gym, concierge, plant room, parking and energy centre) previously referred to in condition 73 (2020/3116/P, dated 3rd December 202) has unintentionally been omitted from the Operative Permission and is proposed for reinserted.

Background

- 1.4 The Planning Statement enclosed in support of the application, prepared by Quod, identifies the planning history for the application Site.

Purpose of this Report

- 1.5 This is a technical addendum to the original Heritage Statement, separate to the February 2025 Environmental Information Letter (EIL). It summarises the findings of an updated impact assessment undertaken of the proposed amendments and the amended proposed development as a whole (the 'February 2025 Amended Proposed Development').

- 1.6 The Heritage Statement Addendum should also be read in conjunction with the following built heritage assessments, prepared by Turley Heritage, contained within the 2017 Environmental Statement (ES) (as amended):

- June 2017 ES Volume 2B Heritage Assessment (including Heritage Statement) that accompanied the 2017 full planning application.
- Supplementary Report: Impact of Proposed Development on Regent's Park (October 2017).
- Heritage Statement Addendum that accompanied the July 2020 S73 application.
- Heritage Statement Addendum that accompanied the July 2022 S73 application.

- 1.7 The revised accurate visual representations (AVRs)¹ contained within Appendix A of the TVIA Assessment, which is Appendix 6 of the February 2025 EIL have informed the assessment in this report.

- 1.8 As noted earlier in this Section, the built heritage impacts of the February 2025 Amended Proposed Development have been assessed in their entirety in this Heritage Statement Addendum, in respect of the conclusions of built heritage assessments contained within the 2017 ES (as amended).

- 1.9 This report does not consider archaeological heritage matters.

Report Structure

- 1.10 The structure of the report is:

- **Section 2:** Review of relevant legislative and policy context.
- **Section 3:** Review of built heritage baseline.
- **Section 4:** Impact assessment of the February 2025 Amended Proposed Development.
- **Section 5:** Summary and Conclusions.

¹ Viewpoint locations 17, 24, 25, 32, 36 & 37

2. Review of Legislative and Policy Context

Statutory Duties

- 2.1 The relevant legislation relating to built heritage matters remains extant, unchanged and valid. This includes s66 and s72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

National Planning Policy Framework

- 2.2 The National Planning Policy Framework (NPPF) has been updated and re-published, since the heritage assessment reports were prepared. The most recent version, published in December 2024, sets out the government's planning policies for England. The policies specific to built heritage matters, relevant to the February 2025 Amended Proposed Development, are not materially different from those in the 2023 version; however, several of the paragraphs have been re-numbered. The following paragraphs are relevant to the February 2025 Amended Proposed Development:

- In determining applications, local planning authorities should; require applicants to describe the significance² of heritage assets affected, including any contribution to made by their setting (207); and should identify and assess the particular significance of any heritage asset that may be affected by proposals (208). The latter should be considered when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the conservation of heritage assets and any aspect of the proposal.
- Generally, local planning authorities should take account of; the desirability of sustaining and enhancing the significance of heritage assets; the positive contribution that conservation of heritage assets can make to sustainable communities; and the desirability of new development making a positive contribution to local character and distinctiveness (210).
- Great weight must be given to the conservation³ of a designated heritage asset⁴ when considering the impact of proposed development – noting that the more important the asset, the greater the weight should be (212) and that this applies irrespective of whether any potential harm amounts to substantial harm or less than substantial harm.
- Any harm to the significance of a designated heritage asset should require clear and convincing justification and substantial harm to (or loss of); grade II assets,

² NPPF Annex 2: Glossary, **Significance (for heritage policy)**: The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

³ NPPF Annex 2: Glossary, **Conservation (for heritage policy)**: The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

⁴ NPPF Annex 2: Glossary, **Designated heritage asset**: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

should be exceptional; assets of the highest significance, should be wholly exceptional (213).

- Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal (215).
- The effect of a proposal on the significance of a non-designated heritage asset⁵ should be considered in the determination of the application – requiring a balanced judgement having regard to the scale of any harm or loss and the significance of the asset (216).
- Local planning authorities should look for opportunities for new development within conservation areas and the setting⁶ of heritage assets, to enhance or better reveal their significance – noting that proposals that preserve those elements of setting that make a positive contribution to the asset should be treated favourably (219).
- The NPPF notes that not all elements of a conservation area will necessarily contribute to its significance and that loss of a building which makes a positive contribution to significance should be treated as either substantial or less than substantial harm, taking account of relative significance of the element affects and its contribution to the significance of the conservation area, as a whole (220).

Development Plan

London Plan

- 2.3 The current London Plan was adopted by the Greater London Authority in March 2021 and sets out the Spatial Development Strategy for all Boroughs within Greater London for the next 20-25 years. There has been no change to London Plan policy relevant to built heritage matters from the August 2022 Heritage Statement Addendum.

Camden Development Plan Documents

- 2.4 The Camden Local Plan (2017); Camden Site Specific Allocations (2013); and Camden Goods Yard Planning Framework (2017) remain unchanged from the August 2022 Heritage Statement Addendum.
- 2.5 The Council consulted on the draft new Local Plan from 17 January to 13 March 2024. There are 2 draft site specific allocations relating to the Morrisons Supermarket (C7) and the Former Morrisons Petrol Filling Station (C8), alongside a draft policy considering heritage matters (D5). These policies are at an early stage and are of limited weight in

⁵ NPPF Annex 2: Glossary, **Heritage asset**: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

⁶ NPPF Annex 2: Glossary, **Setting of a heritage asset**: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

determining applications and the February 2025 Amended Proposed Development has not been assessed against them.

Other Guidance and Material Considerations

- 2.6 The following guidance documents have been updated or superseded since the preparation of the built heritage assessments within the 2017 ES (as amended).
- GLA Planning Practice Note: Heritage Impact Assessments and the Setting of Heritage Assets (2023). The built heritage assessments within the 2018 ES (as amended) and Heritage Statement (2017) (and Addenda) are broadly aligned with the aspirations and approach set out in this Planning Practice Note.
- 2.7 These documents have been used to inform the updated impact assessment contained in this Addendum. The built heritage assessments within the 2017 ES (as amended) and Heritage Statement (2017) (and Addenda) comply with the requirements of this best practice advice.

3. Review of Built Heritage Baseline

- 3.1 A review of the National Heritage List for England, and the Council’s website, confirms that no additional built heritage assets have been identified within the study area⁷, since the built heritage assessments within the 2017 ES (as amended) and Heritage Statement (2017) (and Addenda), which require consideration as part of this report. Accordingly, for the purposes of this Addendum, having regard to the nature of the February 2025 Amended Proposed Development, the built heritage assets summarised in **Tables 3.1 – 3.5** require assessment⁸.
- 3.2 For the purposes of this assessment, the particular heritage significance of designated and non-designated street furniture i.e. lamp posts; telephone boxes; post boxes; and, bollards within the study area, means that they would not be affected by the February 2025 Amended Proposed Development as an element of their setting (Nos.11, 12 and 27 in **Table 3.1**; and, Nos.2, 9, 16 and 26 in **Table 3.5**). Accordingly, they are not considered as part of this report.
- 3.3 There are a number of heritage assets (Nos. 13-17 in **Table 3.2**) identified within 1km of the Site that are located within the Grade I Registered Park and Garden of Special Historic interest of Regent’s Park (see below). Given the nature and extent of the February 2025 Amended Proposed Development, and the particular significance of the heritage assets, it is the role of these structures within the wider historic, designated landscape of Regent’s Park that is assessed as part of this report.

Table 3.1: All Statutorily Listed Buildings within 500m of Application Site

Number	Name	Grade
1	Horse Hospital with ramps and boundary wall at north of site	II*
2	Stanley Sidings, Stables to east of Bonded Warehouse	II
3	Hampstead Road Bridge over Grand Union Canal	II
4	Regent’s Canal Information Centre	II
5	Hampstead Road Lock on the Grand Union Canal	II
6	Roving Bridge over Grand Union Canal west of Hampstead Road Lock	II
7	The Interchange Canal Towpath Bridge over Private Canal Entrance	II

⁷ The ‘Heritage Study Area’ comprises:

- All heritage assets (listed buildings, conservation areas, registered parks and gardens, locally listed buildings and other non-designated heritage assets) within 500m of the Site; and
- All grade I and II* heritage assets within 1km of the application Site.

⁸ The heritage assets marked in grey within Tables 3.1 to 3.5 were excluded from further assessment in the Heritage Statement (June 2017).

Number	Name	Grade
8	The Interchange on north side of Grand Union Canal including II the Horse Tunnel and Stairs, Vaults and Canal Basin	II
9	Camden Incline Winding Engine House	II*
10	The Roundhouse	II*
11	Drinking Fountain set in wall next to The Roundhouse	II
12	Cattle Trough opposite debouchment of Belmont Street, south east of The Roundhouse	II
13	Chalk Farm Underground Station	II
14	Kent House	II
15	Church of the Holy Trinity with St Barnabas	II
16	No.1, Hawley Road	II
17	Nos.57-63 Kentish Town Road and attached Garden Railings, Wall, Pillar and Gate	II
18	No.55, Kentish Town Road	II
19	The Elephant House including Former Coopers' Building, Boundary Walls and Gatepiers	II
20	Arlington House (Former Camden Town Rowton House)	II
21	Nos.38-46, Jamestown Road and Nos.24, 26 and No.28 Oval Road	II
22	Piano Factory Building	II
23	Nos.36 to 41, Gloucester Crescent	II
24	Nos.30 to 35, Gloucester Crescent	II
25	Nos.24 to 29, Gloucester Crescent	II
26	Nos.40, 42 and 44 Inverness Street and attached railings	II
27	Two lamp posts opposite Nos.43 and 40	II
28	Nos.37 to 43 Inverness Street and attached railings	II
29	No.23, Gloucester Crescent	II

Number	Name	Grade
30	Nos.3 to 22, Gloucester Crescent	II
31	Nos.1 and 2, Gloucester Crescent	II
32	Nos.52-59, Gloucester Crescent	II
33	Nos.60 and 61, Gloucester Crescent	II
34	Nos.62 and 63, Gloucester Crescent	II
35	Nos.64 and 65, Gloucester Crescent	II
36	Nos.66 and 67, Gloucester Crescent	II
37	Nos.68, 69 and 70, Gloucester Crescent	II
38	Nos. 2-10 Oval Road and attached railings	II
39	Nos.1-22 Regent's Park Terrace and attached railings	II
40	Nos.15 to 31, Gloucester Avenue	II
41	Nos.1-15, Prince Albert Road	II
42	Cecil Sharp House	II
43	No.10, Regent's Park Road	II
44	Grafton Bridge over the Grand Union Canal	II
45	Vernon House	II
46	Church of St Mark	II
47	Nos.2 and 3, St Mark's Square	II
48	No.4, St Mark's Square and No.36, Regent's Park Road	II
49	Primrose Hill Infants School	II
50	Playground walls, railings and gates to Primrose Hill Infants School	II
51	The Engineer Public House and attached wall	II
52	Primrose Hill Studios	II
53	Nos.24-46 Chalcot Crescent and attached railings	II

Number	Name	Grade
54	Nos.1-11 Chalcot Square and attached railings	II
55	Nos.12, 13 and 14 Chalcot Square and attached railings	II
56	Nos.15-19 Chalcot Square and attached railings	II
57	Nos.20-28 Chalcot Square and attached railings	II
58	Nos.29-33 and 33A Chalcot Square and attached railings	II

Table 3.2: Grade I and II* Statutorily Listed Buildings within 1km of Application Site

Number	Name	Grade
1	Primrose Hill Tunnels (Eastern Portals)	II*
2	Church of St Silas the Martyr	II*
3	Church of St Michael	II*
4	All Saints Greek Orthodox Church	I
5	Nos.2-16, 22-34, 36A and 36B Regent's Park East and attached railings	II*
6	Nos.1-8, 10-14 and 17-19 Regent's Park West and attached railings	II*
7	No.15 Gloucester Gate and attached boundary walls and piers	II*
8	Gloucester Lodge (No.12) Gloucester House (No.14) and attached boundary wall	I
9	Numbers 2 to 11 Gloucester Gate and attached railings	I
10	Number 1-3 and 6-9 St Katherines Precinct and attached railings	II*
11	The Danish Church	II*
12	Nos.4 (The Pastors House) and 5 (St Katherines Hall) and attached screen walls	II*
13	Cumberland Footbridge over Grand Union Canal to Outer Circle, Regent's Park	II*

Number	Name	Grade
14	Chimps Breeding Colony The Gorilla House	I
15	Snowdon Aviary London Zoo	II*
16	Elephant and Rhinoceros Pavilion London Zoo	II*
17	Penguin Pool	I

Table 3.3: Registered Park and Garden of Special Historic Interest within 1km of Application Site

Name	Grade
Regent's Park	I

Table 3.4: Conservation Areas within 500m of Application Site

Name	Date of Designation	Number
Regent's Canal Conservation Area	25 April 1974	1
Primrose Hill Conservation Area	1 October 1971	2
Harmood Street Conservation Area	20 September 2005	3
Camden Town Conservation Area	11 November 1986	4

Table 3.5: Locally Listed Buildings/Non-Designated Heritage Assets within 500m of Application Site

Number	Name
1	Nos.2-8 (even) Ferdinand Street
2	Granite setted carriageway – Ferdinand Place
3	Nos.36-37 Chalk Farm Road
4	No.1a Harmood Street
5	Nos.1-55 Hartland Road (odd-west side)
6	Holy Trinity and St Silas Primary School, Hartland Road

Number	Name
7	Nos.39-49 (odd) and Nos.54-76 (even) Hadley Street and Nos.14 & 16 Lewis Street and street surfacing
8	Post Box – Corner of Hartland Road and Lewis Street
9	Tapping the Admiral PH, No.77 Castle Road
10	No.41 Clarence Way (corner Castlehaven Road)
11	Hawley Infant School, Buck Street
12	The Buck's Head PH, No.202 Camden High Street
13	The Elephant's Head PH, No.224 Camden High Street
14	The Oxford Arms PH, No.265 Camden High Street
15	No.31 Jamestown Road
16	Lamp Posts – Arlington Road (various locations)
17	No.57 A/B/C/D Jamestown Road
18	Nos.61-85 Jamestown Road
19	Nos.14-18 Oval Road
20	No.12 Oval Road
21	Nos.2, 10 & 11 Regal Lane
22	Nos.1 & 2 Bridge Approach
23	Nos.23-49 Adelaide Road
24	No.2 Haverstock Hill and Nos.45-47 Crogsland Road
25	Nos.1-11 Crogsland Road
26	Post Box – Outside No.77 Chalk Farm Road
27	Nos.4-8 (even) and Nos.7-11 (odd) Belmont Street
28	Former Chappell's Piano Factory, No.10a Belmont Street
29	Nos.10-14 (even) Belmont Street

4. Impact Assessment of February 2025 Amended Proposed Development

Introduction

- 4.1 The relevant built heritage policy and guidance context for consideration of the February 2025 Amended Proposed Development is set out in full in Appendix 6 of the Heritage Statement (June 2017) – and subsequent Addenda – and the Supplementary Comment: Impact of Proposed Development on Regent's Park (October 2017), as amended by Section 2 of this report. This includes:
- the statutory duties of the Planning (Listed Buildings & Conservation Areas) Act 1990 including the requirement to have special regard to the desirability of preserving the special interest of a listed building and any elements of setting, which contributes positively to this special interest and to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Importantly, however, the setting of a conservation area is not enshrined in the legislation and does not attract the weight of statutory protection⁹;
 - national policy set out in the NPPF; and
 - local policy for the historic environment and other relevant material considerations.
- 4.2 In accordance with the requirements of the NPPF, the significance of the identified heritage assets, including the contribution made by setting to that significance, has been described Heritage Statement (June 2017) and the Supplementary Comment: Impact of Proposed Development on Regent's Park (October 2017). The Council also summarised their understanding of the particular significance of the relevant heritage assets in the committee report for the March 2023 Consented scheme.
- 4.3 Great weight and importance should be placed on; the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.
- 4.4 The NPPF also highlights that when considering the impact of proposals on the significance of designated heritage assets, great weight should be given to their conservation, and the more important the asset the greater the weight should be.

⁹ APP/H1705/A/14/2219070

Context to Impact Assessment

- 4.5 As a result of its height and massing, the February 2025 Amended Proposed Development would be widely visible, and so would change/be a new element within the Regent's Canal Conservation Area and in the settings of a number of heritage assets (**Section 3** of this Addendum).
- 4.6 In considering the heritage impacts arising from the March 2023 Consented scheme, the Council's committee report stated at paragraph 19.51:

"Heritage Assets: Less than substantial harm would result to The Grade-I listed Regent's Park, the Grade-II listed Horse Hospital, the Grade-II* listed Roundhouse, the Parkhill Conservation Area and the Primrose Hill Conservation Area. This harm is to be accorded considerable weight and importance under s.66 and s.72 and under para 134 of the NPPF is to be weighed against the public benefits of the proposal. The heritage assessment (chapter 6) identifies that in general, the harm can be clearly associated with the proposed accommodation of building heights and densities on the site which result from an aim to optimise development, and which are instrumental to providing the scheme's public benefits."*

- 4.7 The overall planning balance was articulated at paragraph 19.57 of that report, which states:

"The overall assessment demonstrates that the development would lead to some harm, mainly to heritage assets (which is to be accorded considerable importance and weight) and to local amenity. However, the harm is outweighed by the public benefits of the development, which responds to the many challenges and constraints of the site with a new urban neighbourhood which would provide a high quality environment for all those who live, work and visit the place."

Summary of February 2025 Amended Proposed Development

- 4.8 The February 2025 Amended Proposed Development proposes minor external changes to the consented massing of buildings within the Main Site, which require consideration in terms of the potential impacts on the significance of the relevant heritage assets, having regard to the conclusions of the March 2023 Consented scheme (as amended):

- **Block C:**
 - Insert second stairs to comply with the latest fire safety guidelines for residential buildings
 - External balconies in place of inset balconies to the east elevation in response to insertion of second stairs
 - Extension of terrace for 4 homes which currently comprise inset balconies enhancing resident external amenity.
 - Minor reduction in block height from 73,950mm (AOD) to 73,350mm (AOD) due to floor-to-floor height reduction from 3,1500mm to 3,075mm

- **Block D:**
 - Minor reduction in block height from 54,300mm (AOD) to 53,900mm (AOD) due to floor-to-floor height reduction from 3,150mm to 3,075mm
 - Minor change to block elevation arising from fire safety compliance
- **Block E1:**
 - Marginal increase to block footprint (0.5m on the east, west, north elevations) to accommodate secondary staircase
 - Minor reduction in block height from 73,375mm (AOD) to 70,400mm (AOD) due to floor-to-floor height reduction from 3,375mm to 3,075mm
 - Relocation of Morrisons emergency escape stairs within block E1 to external location between E1 and E2
- **Block E2:**
 - Minor reduction from 52,950mm (AOD) to 52,200mm (AOD) for G + 4 storeys section of the block. For G + 2 storeys section of the block minor reduction from 45,450mm to 45,075mm block height. This is due to a reduction in floor-to-floor heights from 3,150mm to 3,075mm
- **Block F:**
 - Insert second stairs to accord with requirements of fire safety guidelines for residential buildings.
 - Minor reduction of block height due to floor to floor height reduction from 3,150mm to 3,075mm. Reduction of AODs for tallest aspect of the block are 73,875mm to 72,075mm (AOD). AODs for each core as follows:
 - (i) Block F1: 68,213mm (AOD) to 67,914mm (AOD)
 - (ii) Block F2: 73,875mm (AOD) to 72,075mm (AOD) for G+10 storeys section of the block. 60,606mm (AOD) to 58,785mm (AOD) for G+6 storeys section of the block.
 - (iii) Block F3: 64,410mm (AOD) to 64,035mm (AOD) for G+6 storeys section of the block. 54,050mm (AOD) to 53,551 (AOD) for G+4 storeys of the block.

4.9 There are no changes to previously consented materiality, colours and tone of these Blocks proposed as part of the February 2025 Amended Proposed Development.

4.10 The other proposed changes, for instance, changes to the affordable housing provision; minor amendments to mix of uses and residential homes; and changes to internal layouts; will not have a material impact on the significance of heritage assets and do not require further consideration as part of this report.

- 4.11 There are no changes proposed to the blocks on the former PFS (the PFS Parcel) as part of the February 2025 Amended Proposed Development.

Heritage Impact Assessment

- 4.12 Like the March 2023 Consented scheme (as amended), the February 2025 Amended Proposed Development has been conceived based on a detailed understanding of the constraints of the application Site, including the particular significance of heritage assets within the study area; the remarkable opportunity to revitalise this part of Camden; and, to reintegrate the application Site into the wider townscape context. The impacts of the February 2025 Amended Proposed Development, both beneficial and harmful, are derived directly from this ambition to deliver a transformational scheme. As such, they are interrelated, and the overall effects of the February 2025 Amended Proposed Development upon the significance of the relevant built heritage assets must be considered in their entirety, having regard to the substantial public benefits (widely defined for the purposes of the NPPF), which would be delivered.
- 4.13 In addition, the February 2025 Amended Proposed Development is part of the authorised and emerging pattern of change in the local townscape context supported by specific planning policy, including the grant of planning permission for the comprehensive redevelopment of the 100 Chalk Farm Road site¹⁰.
- 4.14 As confirmed by the application drawings; Design and Access Statement Addendum; and updated accurate visual representations, the overall disposition, height (albeit with minor reduction), form and arrangement of new buildings (and the associated new visual relationships with the relevant heritage assets); materiality and elevational composition of the proposed blocks; changes in character (including use character); public realm; creation of new routes within the Site, relative to the identified heritage assets, remains consistent with the March 2023 Consented scheme. In those terms, the effects of the February 2025 Amended Proposed Development on the significance of these heritage assets, when compared to the previously identified effects, are *de minimus*.
- 4.15 The February 2025 Amended Proposed Development will, therefore, not change the previously identified direct and indirect effects on the significance of the Regent's Canal Conservation Area or the indirect effects on other heritage assets through change in parts of their settings when compared to the March 2023 Consented scheme (as amended).
- 4.16 In overall terms, consistent with the assessment of the impacts of the March 2023 Consented scheme, save for the small number of designated heritage assets identified in paragraph 4.17, the February 2025 Amended Proposed Development sustains, and, to a degree, enhances the particular significance of most of the heritage assets identified within the study area, including the contributions made by setting to that significance. In those terms, the February 2025 Amended Proposed Development is consistent with the relevant statutory duties of the Planning (Listed Buildings & Conservation Areas) Act 1990, the requirements of the NPPF and Development Plan policy.

¹⁰ Application ref.: 2024/0479/P

- 4.17 The February 2025 Amended Proposed Development would not amplify or otherwise alter the previously established levels of heritage harm caused through change in parts of their townscape settings, which remains less than substantial for the purposes of the NPPF and 'calibrated' as comparatively modest in all instances:
- The Roundhouse (Grade II* listed building).
 - The Interchange Building (Grade II listed building).
 - Nos.1-15 Prince Albert Road (Grade II listed buildings).
 - Primrose Hill Infants School (Grade II listed building).
 - The Engineer PH (Grade II listed building).
 - Primrose Hill Conservation Area.
 - Harmood Conservation Area.
 - Regent's Park (Grade I Park and Garden of Special Historic Interest).
- 4.18 The Planning Statement provides the clear and convincing justification for that heritage harm (paragraph 213 of the NPPF).
- 4.19 The identified less than substantial harm must be weighed in the balance against the public benefits, which include heritage benefits, as required by paragraph 215 of the NPPF and must be accorded great weight and importance (paragraph 212 of the NPPF).
- 4.20 In this instance, the overarching public benefits are directly linked to the redevelopment of this important but underutilised site and the creation of a high-quality new neighbourhood and delivery of additional high-quality office floorspace in this town centre location. These substantive public benefits, and the overall planning balance, are identified in the Planning Statement.

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