



Historic England

LONDON OFFICE

Mr David Fowler  
London Borough of Camden  
5 Pancras Square, c/o Town Hall  
Judd Street  
London  
WC1H 9JE

[REDACTED]  
Our ref: P00492930

11 January 2016

Dear Mr Fowler

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015  
CENTRAL SOMERS TOWN COVERING LAND AT POLYGON ROAD OPEN SPACE, EDITH NEVILLE PRIMARY SCHOOL 174 OSSULSTON STREET AND PURCHASE STREET OPEN SPACE, LONDON, NW1  
Application No 2015/2704/P**

Thank you for your letter of 6 January 2016 notifying Historic England of the above application. You will be aware that we provided pre-application advice (our reference: PA00400238) on 20 October and have provided a response to the current Listed Building Consent application on 6th January (our reference: L00492504).

**Summary**

This application forms part of the wider regeneration of Somers Town which has been developed as part of a Community Investment Programme for the area. Whilst the Impact Assessment provided with the application demonstrates that there will be some harm to the setting of designated heritage assets, Historic England is of the strong view that further views are required. This is to ensure any harm to the historic environment can be fully assessed as part of the planning process.

**Historic England Advice**

Somers Town was laid out in the late C18 as terraces of Georgian houses close to St Pancras Old Church, one of the oldest churches in London. The arrival of the railway termini of Euston, St Pancras and Kings Cross in the C19 brought with it significant changes including overcrowded slums associated with displaced local residents and railway workers. Subsequent efforts to address the inadequate housing in Somers Town began in 1899 with the first LCC housing development and continued throughout the C20. As a result, the area is very varied in its character and appearance but has managed to retain some of its earlier Georgian and Victorian buildings, many of which are listed.

**Proposals**

There is a Community Investment Programme (CIP) for the regeneration of the



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST  
[REDACTED]



*Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.*



Historic England

## LONDON OFFICE

Somers Town area. These proposals forms part of that wider programme and seeks to regenerate the area from Brill Place, just north of St Pancras Station to Edith Neville Primary School. The main aspect of the planning application in respect of the historic environment relates to the construction of an 25 storey residential tower on Brill Place and its impact on the setting of a number of designated heritage assets.

### Policy

The policies outlined below form the statutory basis on which the authority is duty bound to make its decision unless there are material reasons why this should not be the case.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the primary legislation which protects the historic environment. Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty upon local planning authorities to consider the impact of proposals on listed buildings and conservation areas. With regard to listed buildings, it states that the determining authority 'shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.' And in respect of conservation areas, it requires that 'special attention be paid to the desirability of preserving or enhancing the character or appearance of that area.'

The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the 12 core principles that define sustainable development.

NPPF policy advises that for new development to be sustainable it needs to encompass an economic, social and environmental role, with the latter including the protection and enhancement of the built and historic environment. Paragraph 8 notes that these roles are mutually dependent and should not be taken in isolation; and that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. Paragraph 7 of the NPPF states that the environmental role of a development includes protection and enhancement of the historic environment, while section 12 sets out how the historic environment should be conserved and enhanced. Paragraph 132 states that when considering the impact of a proposed development on a heritage asset, 'great weight' should be given to preserving its significance.

Paragraph 132 states that 'any harm or loss should require clear and convincing justification' and paragraph 133 sets out the tests which must be met when considering applications which cause substantial harm including public benefits and securing reasonable use. Paragraph 134 states that proposals that would lead to less than substantial harm should be weighed against the public benefits of the proposal



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST



*Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.*



Historic England

## LONDON OFFICE

including securing its optimum viable use. Where a proposal would result in harm to the significance of a designated heritage asset, this must be assessed by the criteria set out in paragraphs 133 or 134, depending on the degree of harm caused.

The Revised London Plan, as adopted in July 2011, provides a strategic framework for development in London. This includes key policies related to the safeguarding of London's heritage assets and their settings. Specific policies related to this proposal which should be addressed include policy 7.8 (heritage assets) part C and D (planning decisions) of the London Plan. Part D states that 'development affecting heritage assets should conserve their significance by being sympathetic to their form, scale, materials and architectural detail.'

Camden's Local Development Framework sets out policies for considering development within the borough and DP25, 'Conserving Camden's Heritage' would be particularly relevant in this case especially points (d) and (e) which refer to the setting of designated heritage assets. I understand that there are also policies which relate to the redevelopment of this area in the Somers Town Area Action Plan.

### Position

The proposed residential tower on Brill Place would be 25 storeys high (96.5m AOD) which is comparable in height with the tower of St Pancras Station (grade I) which is slightly taller at 99m AOD. I understand that the adjustment of the location of the tower on the site has reduced its impact on designated heritage assets. Based on the views study provided, the proposed tower will be cause some harm to the setting to the Georgian terrace on Charrington Street and Pancras Road Arches, which formed part of the former Good's Yard, both of which are listed grade II. I consider this harm to be less than substantial as set out in paragraph 134 of the NPPF. You will be aware that 'great weight' must be given to the historic environment and that any harm to it must be considered carefully in the context of the public benefits of the proposals, including any heritage benefits.

When I provided pre-application advice on these proposals, I noted that in the view of St Pancras Station (grade I) shows the building just below the roof line but would clearly appear above the roof of the modern extension to the station. Given the very high significance of the station and the considerable aesthetic and historic value of the roof structure, which was the longest in the world when it was constructed, it is important to demonstrate whether the new tower would appear in kinetic views (i.e. at what point it would appear as one moves north along Pancras Road). Similarly, views of the proposals should be assessed from the public square to the east of the German Gymnasium (grade II) and within the courtyard of the British Library (grade I)

With respect to additional longer views, studies should be prepared of the views from the Inner and Outer Circle of Regent's Park (grade I), looking west along Pentonville Road and the Primrose Hill LVMF protected view. This is to ensure that any harm to



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3700  
HistoricEngland.org.uk



*Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.*



Historic England

LONDON OFFICE

the historic environment can be established and assessed as part of the planning process.

I urge you to address these points and request these additional views to ensure that any harm to the historic environment can be fully assessed as soon as possible as part of the application process. Please advise Historic England when this additional information has been submitted so that we can provide a complete response to your consultation.

**Recommendation**

The additional view studies should be prepared as soon as possible and provided as part of the assessment of this planning application to ensure that any harm caused to the historic environment by these proposals can be fully assessed as soon as possible.

Please note that this response relates to historic building and historic area matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3712).

Yours sincerely

**Breda Daly**

Inspector of Historic Buildings and Areas

E-mail: [breda.daly@HistoricEngland.org.uk](mailto:breda.daly@HistoricEngland.org.uk)



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



*Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.*