

Mr David Fowler
London Borough of Camden
5 Pancras Square, c/o Town Hall
Judd Street
London
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Date 24 May 2016
Ref: **FOL16/358**



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 the Information sent regarding the above-mentioned site. After reviewing all the details submitted in regards to the above proposal, I can confirm that the Royal Parks state our Objection to this planning application.

The height of the new building and its impact upon general views The Regent's Park and more specifically from Chester Road and the Inner Circle are of a concern to us. The main objective of The Royal Parks is to conserve and enhance sustainably, for the enjoyment of this and future generations, of our world class natural and built historic environment and our biodiversity. We as an organisation adhere to the statutory spatial development strategy of the London Plan (2004) and through this, would still deem the footprint as having an adverse impact on the views from The Regent's Park.

As Historic England have advised in their letter to you, and with which we at The Royal Parks concur;

The significance of the Architect John Nash and his work at Regent's Park have been the researched extensively, including by Historic England (formerly English Heritage) in its book, 'John Nash: Architect of the Picturesque' (2013). Its value is reflected in the grade I listed status of the park's landscape, the individual grade II listing of the parkland structures within it and the terraces designed to line its boundary which are all grade I. The individual and group value of the assets are such that they are of the highest national aesthetic, historic and communal value.

Whilst the response prepared accepts that the significance of Regent's Park is 'well understood', it states at paragraph 2.6, 'Where our position diverges from Historic England is in the contribution made by setting to the significance of the heritage assets, the seeming conflation of the significance of Chester Terrace and Regent's Park, and the magnitude of impact of the proposed development on that significance.'

The NPPF makes it clear that the setting of a heritage asset is the surroundings in which a heritage asset is experienced. Historic England's Good Practice Advice Note 'The Setting of Heritage Assets' (2015) sets out in detail what should be considered when determining the setting of an asset. It identifies views as being of particular importance and recognises 'those where the composition within the view was a fundamental aspect of the design or function of the heritage asset' (paragraph 6).

The Regent's Park Conservation Area Appraisal was adopted by LB Camden on 2011. At 4.6 'Key Views', it states 'Approaching the area, these view emphasise the relationship of city to green space: From the Park to the Terraces seeing clear roofline (without buildings in the background).

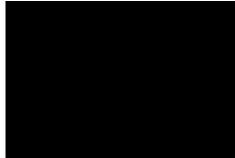
The Regent's Park Management Plan, adopted by The Royal Parks (2015) at 9.1 offers some analysis of the views from Regent's Park and states, 'The historic terraces bordering the park and the villas within the park are integral to the design and layout of the park, The majority of views from the park are truncated by buildings: for the most part historic views of the elegant terraces as Nash intended.' It goes on to note that 'Large areas of the park are currently unaffected by the impacts of modern high buildings beyond the terraces, preserving an illusion of the nineteenth century character.' It identifies the aspiration to '...restore the character and presence of views between historic buildings and surrounding parkland including Nash terraces and villas' as a key management issue (section 11).

Historic England therefore fundamentally disagrees with the implication that the Royal Parks do not share our understanding of the significance of Regent's Park.

It is our firm view that the proposed development cannot be described as having 'a neutral impact' on the significance of these heritage assets. The proposed tower will clearly appear above the roofline of Chester Terrace and be clearly visible from the Inner Circle of Regent's Park. Given there are few examples of towers infringing upon the skyline and the value, as described in our letters, which is ascribed to by both LB Camden and the Royal Parks, it can only be concluded that the proposal would cause harm. Historic England, therefore, remain firmly of the view that the proposals would cause harm to designated heritage assets of the highest significance and objects to these proposals.

Yours sincerely

PP.



Iain McDowell
Director of Estates