

**From:** Fowler, David  
**Sent:** 23 May 2016 11:38  
**To:** Planning  
**Subject:** FW: Central Somers Town - 2015/2704/P

Please upload objection.

Thanks,

David

David Fowler  
Principal Planning Officer

Telephone: 0207 974 2123



Mr David Fowler  
3765  
London Borough of  
Camden  
5 Pancras Square, c/o Town Hall  
P00492930  
Judd  
Street

Direct Dial: 020 7973

Our ref:

London

WC1H 9JE  
2016

29 March

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**

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Thank you for your letter of 6 January 2016 notifying Historic England of the above application. The inclusion of further information demonstrating the impact of the proposals on the significance of designated heritage assets, including Regent's Park and listed buildings within and adjacent to it, has required us to update our position following consideration by our internal Casework Review panel.

#### **Summary**

Regent's Park and the buildings within and adjacent to it possess very high levels of historic and aesthetic significance. As a consciously designed ensemble they are amongst the most significant in London and are highly valued both nationally and internationally. They form one of London's most distinctive places which is enjoyed and experienced by millions each year.

The additional information provided by the applicants, at our request, demonstrates the harm that the one element of the proposals would have on the ability to appreciate and enjoy the significance of Regent's Park and some of the listed buildings associated with it, specifically Chester Terrace, listed at grade I. This impact arises from the intrusion of one element of the proposals into the setting of the registered landscape and its associated listed buildings. In assessing this impact we have been mindful of the requirements in government statute and policy to preserve the historic environment from harm unless it is necessary to deliver public benefits that clearly and convincingly outweigh it.

Your authority as decision maker is required to have special regard to preserving listed buildings and their settings and great weight must be given to the protection of the historic environment in your planning judgement on this case. Our advice is that on the evidence before us, we do not see convincing justification that this harm to designated heritage assets of the highest significance is necessary and therefore the proposals should be amended to avoid it.

#### **Historic England Advice**

Our previous advice (letter dated 11 January 2016) stated that the proposals would result in some harm to the significance of nearby grade II listed buildings because of the impact on their setting. At that time we requested additional views to enable an assessment of potential impact on other designated heritage assets, principally Regent's Park and its immediate surroundings. We have now received and assessed that additional information, including at our internal Casework Review, and our position is set out below.

#### *Significance of Heritage Assets affected by the proposals*

The significance of Regent's Park and the importance of its designer John Nash is well known and will only be summarised here. Whilst Nash's 1806 vision for "The Regent's Park" and its development for the "wealthy and the good" was never fully realised, the park and its associated buildings and structures constructed between 1812 and 1827 are of the highest architectural and historic significance. As part of a greater whole involving the grand remodelling of part of London to provide a great triumphal route anchored by the Regent's Park at one end and Carlton House Terrace at the other, via Portland Place, Regent Street and Haymarket, it is of the highest communal interest and significant in a European and indeed, world context.

The focal point of the park itself is formed by the Inner Circle, from which an axial route leads east to the Regency villas and terraces lining the edge. The route was consciously designed to provide framed views of the landscape through which you passed. The views terminate with the Classical elevation of Chester Terrace, which comprises terraced houses designed externally as a grand palace extending for 280 metres. This terrace designed by Nash's assistant Decimus Burton is listed at grade I and was completed in 1825. At three storeys high and with a Mansard roof it is generously proportioned to be of appropriate scale in relation to the landscape, and is characterised by a coherent architectural unity and detail. The grandeur and rhythmic composition of the stucco façade are among the defining characteristics of the terrace and highly significant architectural elements

that terminate the designed view looking eastwards from the Inner Circle. Burton's composition realised the intention of Nash, which was to invoke a sumptuous palace within a picturesque English garden landscape and this piece of architectural theatre remains highly legible.

#### *Impact*

The proposed new residential tower, which would be 25 storeys high, will appear above the roof of the listed terrace, to the left of the central axis as viewed from the Inner Circle. It will be significantly taller than the listed building and it will be visible day and night. There are no other tall buildings in this key view from the heart of the registered landscape.

#### *Policy*

At the heart of government policy for the historic environment is conserving heritage assets in a manner appropriate to their significance. This is a core planning principle. Failure to conserve heritage assets, i.e. manage change so that their significance and importance is protected and enhanced, means that the aims of sustainable development, the "Golden Thread" of the NPPF, is not achievable. Section 12 of the NPPF sets out how the historic environment should be conserved and enhanced and at paragraph 132 it is made clear that when considering the impact of proposed development on a heritage asset (which includes its setting) "great weight" should be given to preserving its significance. The principle is that no harm should be caused to the historic environment, because it is irreplaceable, and therefore any harm to significance requires clear and convincing justification. Substantial harm to designated assets of the highest significance should be regarded as wholly exceptional and should normally be refused.

Therefore it follows that where harm is unavoidable and required to deliver public benefits it should be less than substantial, although it still needs clear and convincing justification.

The Government also places importance on the objective of good design and in paragraph 58 of the NPPF it seeks design that responds to local character and history. Good design furthermore should seek to promote or reinforce local distinctiveness (paragraph 60) and should integrate well into existing context (paragraph 61). Poor design, that is design which fails to take the opportunities available for improving the character and quality of an area, should be refused (paragraph 64).

The objectives of Government regarding the historic environment are appropriately reflected in the London Plan which has policy related to safeguarding heritage assets and their settings (Policy 7.8) and also has policy relating to Tall Buildings (7.7 parts A and E) This policy requires tall buildings to be part of a plan-led approach and that they should not have an unacceptably harmful impact on their surroundings. It further advises that sensitive locations should be given particular attention.

Camden's Local Development Framework is in conformity with these London Plan policies with regard to the historic environment, and DP25 Conserving Camden's Heritage is particularly relevant, especially points (d) and (e) which refer to the setting of designated heritage assets.

Historic England has also provided advice on how to approach the setting of Heritage assets, which sets out that it is important to understand the contribution that the setting of asset makes to its significance in order to then assess the impact that a proposal has upon it.

#### *Updated Historic England Position*

The significant elements that make up the view designed by Nash from the Inner circle towards Chester Terrace are substantially intact. The ordered elevation of Chester Terrace terminates an axial view along a route from the heart of the registered landscape to its outer edge which can still be experienced by visitors today. Nash's intention of combining the ordered architecture and the picturesque landscape, uninterrupted by any visual sense of development beyond, currently survives

substantially intact and this route is one of the best places from which to appreciate and understand this composition.

The additional information demonstrating the impact of the proposal upon the setting of the Regent's Park and Chester Terrace in the designed view from the Inner Circle shows that the tall building will be clearly seen. This visual intrusion into a carefully designed piece of architectural theatre strikes a discordant note and erodes the original design intention of Nash and Burton, which has been appreciable as a set piece largely unaffected by later development for almost 200 years. The proposed new building does not, nor could it, respond to the architectural composition of Chester Terrace and by virtue of its presence it competes with the terrace for attention at the end of the view, thereby eroding the appreciation and enjoyment of this key element of the designed landscape and an understanding of the relationship between the two designated heritage assets.

Whilst we support the redevelopment of the Somerstown site in principle and accept that provision of a school could be considered a public benefit, we do not believe it has been demonstrated that this is the only way in which these benefits can be delivered. Although the harm we have identified is less than substantial in terms of the NPPF, it is nevertheless significant and serious and affects heritage assets of the highest designation.

#### **Recommendation**

Historic England objects to these proposals on the basis of the harm caused to heritage assets of the highest significance. We recommend that alternative approaches to redeveloping the site to provide the school are required in order to avoid this harm. We recommend that this application is withdrawn to allow those alternatives to be considered. If it is not possible for the application to be withdrawn and it remains in its current form we recommend that it is refused.

I am happy to provide further clarification of the views set out in this letter or provide additional advice on potential amendments that could achieve a development we can support.

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



**Michael Dunn**

Principal Inspector of Historic Buildings and Areas  
E-mail: michael.dunn@HistoricEngland.org.uk

cc: Marc Timlin, Turley