

Heritage Statement

Primrose Hill Catering Facility, London
Borough of Camden

August 2016

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1. Introduction

1.1 This Heritage Statement has been prepared by Turley Heritage on behalf of The Royal Parks in support of proposals for the extension of the existing toilet block within Primrose Hill to form a cafe. The Application Site (hereafter referred to as 'the Site') is situated within the Primrose Hill Registered Park and Garden, within the southern extent of the park.

1.2 The National Planning Policy Framework (NPPF) provides the Government's national planning policy on the conservation of the historic environment. In respect of information requirements for applications, it sets out that:

'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'¹.

1.3 To comply with these requirements, Section 2 of this statement firstly identifies the relevant heritage assets proximate to the Application Site that may be affected by the proposed development. Section 3 provides a short overview of the application site as identified in photographs.

1.4 Section 4 provides an assessment of significance of the grade II registered Primrose Hill Park and Garden of Historic Interest which is proportionate to both the importance of the asset and the likely impacts. This assessment is undertaken on the basis of published information, archival research and on-site visual survey. This includes an assessment of the contribution of the Site to the heritage significance of the heritage asset.

1.5 Section 5 provides an assessment of the impact of the proposed development on the significance of the identified designated heritage asset, in light of the national policy contained within the National Planning Policy Framework (NPPF 2012), and local planning policy for the historic environment (set out in detail at *Appendix 1*).

¹ DCLG (2012) National Planning Policy Framework (NPPF) – para. 128

2. Heritage Assets

- 2.1 The NPPF defines a heritage asset as:

“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.”

Designated Heritage Assets

- 2.2 Designated heritage assets are those which possess a level of heritage interest that justifies designation and are then subject to particular procedures in planning decisions that involve them.

Registered Parks and Garden

- 2.3 The Site forms part of the southern section of Primrose Hill. The park was included on the Register of Parks and Gardens of Special Historic Interest at grade II in 2001. The register entry which sets out a summary of the historic development and description of the park is included in *Appendix 2*.

Listed Buildings and Conservation Areas

- 2.4 There are a number of listed buildings and conservation areas in the immediate vicinity of the Site; however, it is considered that due to their nature and extent, the application proposals will not affect their significance through development within their setting. Accordingly, it not necessary to consider their heritage significance as part of this report.

Non-Designated Heritage Assets

- 2.5 The Framework² identifies that heritage assets include both designated heritage assets and assets identified by the local planning authority (including local listing).

Local List

- 2.6 Camden Borough Council maintains a register of unlisted buildings of local architectural or historic interest or “local list” which was adopted in January 2015. There are a number of boundary markers (Ref’s: 161, 162, 166, 167 & 168) within Primrose Hill which have been included in the Borough’s local list. However, the application proposals will not affect their local significance through development within their setting. Accordingly, it not necessary to consider their heritage significance as part of this report.

LVMF

- 2.7 The panoramic view from the top of Primrose Hill towards London is protected within the London View Management Framework (March 2012), a supplementary planning document to the London Plan. Due to the relatively modest form and height of the development and its visual screening by dense surrounding vegetation, the proposed single storey extension will not impact on one’s appreciation of this view.

² DCLG (2012) National Planning Policy Framework (NPPF) – Annex 2: Glossary

3. Overview of the Site

Description and Context

- 3.1 As aforementioned at paragraph 1.1, the Site (Figure 3.1) forms part of the southern boundary of Primrose Hill, adjacent to Prince Albert Road. The Site consists of toilet facilities constructed in the 20th century which are located between the children's recreation ground and the trim trail.



Figure 3.1 – The Site within Primrose Hill

- 3.2 The toilet facilities are constructed from brick with pitched slate roofs and timber casement windows. The east side of the existing building provides children toilet facilities, a covered seating area with an accessible toilet and a toilet attendant's office to the playground (Figure 3.2).



Figures 3.2 & 3.3 – The existing building on the Site

- 3.3 To the north side of the building are female public toilets, toilet attendant's office, a storage room and two accessible toilets which are accessed directly from Primrose Hill parkland (Figure 3.3). The west side of the existing building provides an access route down to the existing male public toilets and toilet attendants office.

4. Significance of the Heritage Assets

Significance and Special Interest

- 4.1 The NPPF defines the significance of a heritage asset as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”³

Registered Parks and Gardens

- 4.2 The main purpose of the Register is to identify designed landscapes of special historic interest. Whilst there is no additional statutory protection arising from inclusion on the register it is a ‘material consideration’ in the planning process, meaning that planning authorities must consider the impact of any proposed development on the landscapes’ special character. In considering the potential special historic interest of a park or garden the principal overarching consideration is age and rarity.
- 4.3 A set of nine guiding selection criteria produced by Historic England on the basis of their special historic interest. A set of nine guiding selection criteria produced by Historic England is used to assess whether a designed landscape holds sufficient special historic interest to merit inclusion in the register. These criteria are complimented by a set out four selection guides produced by Historic England which describe the types of designed landscapes included in the register. The relevant selection guide for Primrose Hill is ‘Urban Landscapes’.

Assessment

- 4.4 The following assessment of significance is proportionate to the importance of the identified designated heritage asset and sufficient to understand the impact of the application proposals, given their nature and extent. As aforementioned at paragraph 1.5, this has been based on existing published information, archival research and on-site visual survey.

Primrose Hill (Grade II Registered Park and Garden)

Historical Development and Interest

- 4.5 The history of Primrose Hill dates to at least the 12th century when ‘sundry devout men of London’ gave four hides of land in the field of Westminster and eighty acres of land and wood in Hendon, Chalcot, and Hampstead to the Leper Hospital of St. James (afterwards St. James’s Palace).⁴ In the 15th century, Henry VI gave custody of the hospital into the hands of the provost and fellows of his newly-founded college of Eton and with it the lands in and around Primrose Hill.

³ DCLG (2012) National Planning Policy Framework (NPPF) – Annex 2: Glossary
⁴ Cassell, Petter & Galpin (1878) Old and New London: Volume 5 – Primrose Hill and Chalk Farm
[URL:<http://www.british-history.ac.uk>]

- 4.6 The hospital was subsequently demolished in 1531 by Henry VIII who then constructed St James's Palace as a smaller residence to escape formal court life.⁵ The property of Chalcot and its neighborhood (forming part of Primrose Hill) remained in the ownership of Eton College.⁶
- 4.7 During this time, the land consisted of open farmland with hedgerow boundaries and some remaining trees believed to be the ancient Middlesex Forest.⁷ By the early 17th century the hill was noted for the primroses that grew upon it, which eventually led to it being known as Primrose Hill.⁸
- 4.8 The hill is referred to in detail during the mid to late 17th century due to its association with the death of Sir Edmund Berry Godfrey. Godfrey became associated with an anti-Catholic campaign in 1678 and was subsequently murdered with his body later found in a ditch on the south side of Primrose Hill in the same year.⁹ The discovery of his body caused anti-Catholic uproar in England due to rumors of it being the work of Catholic plotters.¹⁰ Three men were found guilty and sentenced to death in 1679 and subsequently hanged at Primrose Hill.¹¹ They were later found innocent with the murder of Godfrey remaining unsolved.

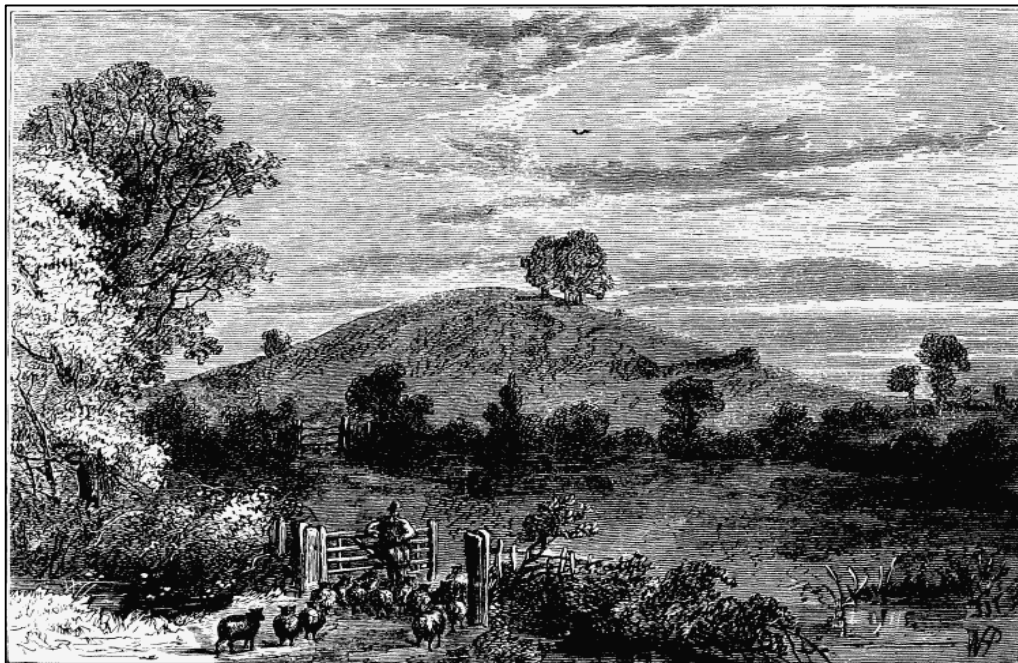


Figure 4.1 – Engraving of Primrose Hill c.1780¹²

⁵ Wagner, John (2011) Encyclopedia of Tudor England.
⁶ Historic England (2001) Register Entry for Primrose Hill
⁷ Gillespie, W (1981) The Regents Park: Royal Parks Survey
⁸ Cassell, Petter & Galpin (1878) Old and New London: Volume 5 – Primrose Hill and Chalk Farm
[URL:<http://www.british-history.ac.uk>]
⁹ Cassell, Petter & Galpin (1878) Old and New London: Volume 5 – Primrose Hill and Chalk Farm
[URL:<http://www.british-history.ac.uk>]
¹⁰ Kenyon, J.P. (2000). The Popish Plot
¹¹ Cassell, Petter & Galpin (1878) Old and New London: Volume 5 – Primrose Hill and Chalk Farm
[URL:<http://www.british-history.ac.uk>]
¹² Cassell, Petter & Galpin (1878) Old and New London: Volume 5 – Primrose Hill and Chalk Farm
[URL:<http://www.british-history.ac.uk>]

- 4.9 As depicted in an engraving of Primrose Hill at the end of the 18th century (Figure 4.1), there was little built development in or around the surrounding area. It wasn't until the early 19th century that the area was slowly redeveloped for housing.
- 4.10 Primrose Hill was still in the ownership of Eton College by the early 19th century and in c.1827, the provost and fellows of Eton began to see value in their property. They subsequently obtained an Act of Parliament enabling them to grant leases of lands in the parishes of Hampstead and Marylebone. In c.1829, plans were drawn up to develop the whole of Primrose Hill, including a new road linking to the north. No offers were, however, received for the land.
- 4.11 In c.1831 a private individual leased the hill intending to sub-let it to the Royal Botanical Society and in 1836, the London Cemetery Company made an application to turn Primrose Hill into a burial ground. Neither of the proposals was approved.¹³
- 4.12 Soon after the accession of Queen Victoria in 1838, endeavours were made to obtain Primrose Hill for the Crown as part of an extension to Regent's Park.¹⁴ A public act was subsequently passed for affecting an exchange between Her Majesty and Eton College. By this act, Eton College received certain property at Eton and gave up all their rights to Primrose Hill.¹⁵ Primrose Hill subsequently became Crown property in c.1841 and was opened to the public a year later (Figure 4.2).

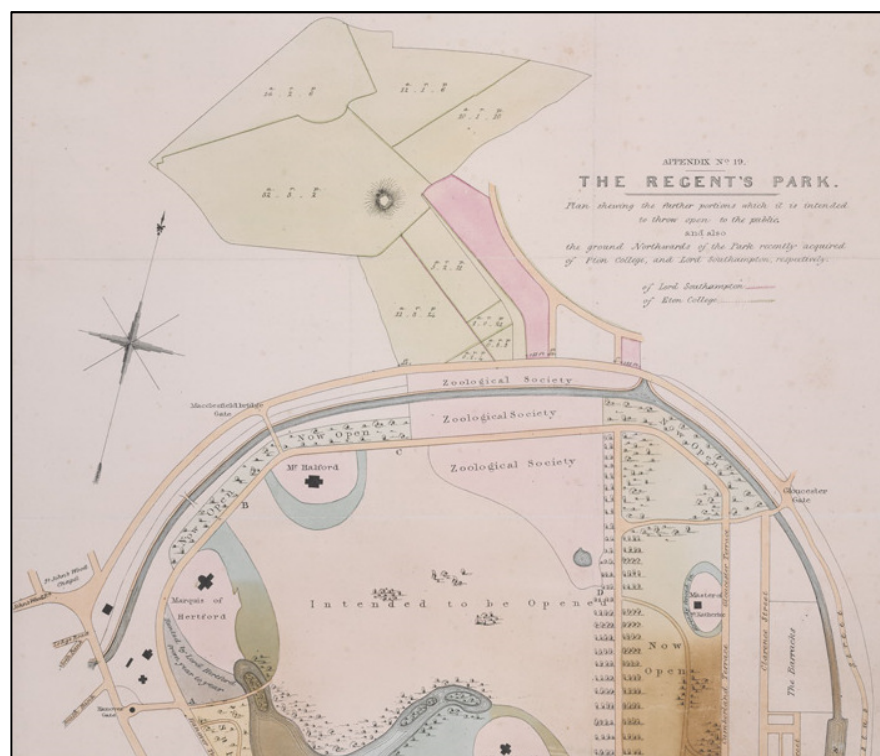
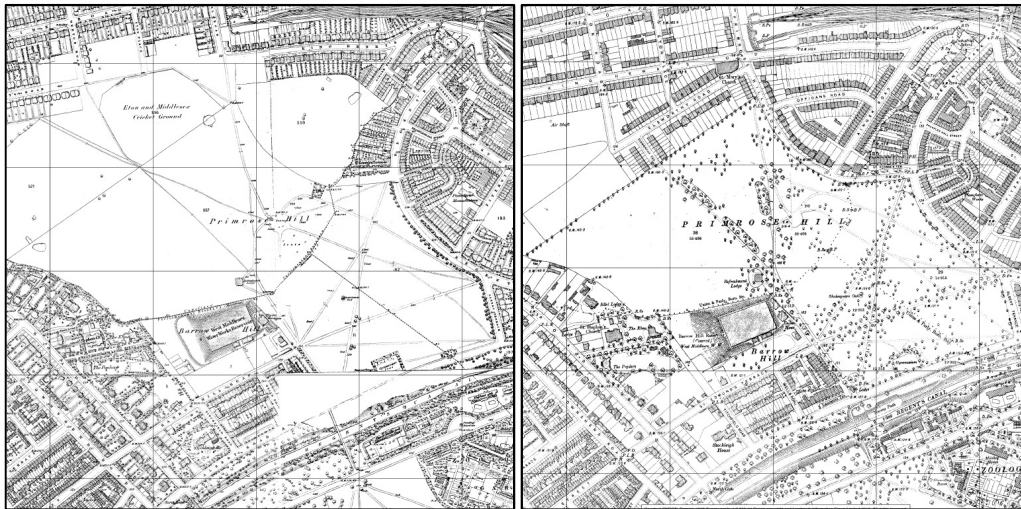


Figure 4.2 – Plan of Regent's Park and Primrose Hill by James Basire c.1841¹⁶

¹³ Historic England (2001) Register Entry for Primrose Hill
¹⁴ Historic England (2001) Register Entry for Primrose Hill
¹⁵ Cassell, Petter & Galpin (1878) Old and New London: Volume 5 – Primrose Hill and Chalk Farm
[URL:<http://www.british-history.ac.uk>]
¹⁶ Basire, J (1841) Plan of Regent's Park [URL: <http://www.bl.uk/onlinegallery>]

- 4.13 The boundaries to Primrose Hill were originally marked out by an oak fence with all the former hedgerows removed. A gymnasium (now part of the Site) was constructed to the southern boundary of the hill in c.1847.¹⁷
- 4.14 In 1851 Primrose Hill, along with the parkland of Regent's Park, was transferred, by means of the Crown Land Act, from the management of the Commissioners of Woods, Forests and Chases, to the newly formed Ministry of Works.¹⁸



Figures 4.3 & 4.4 – 1871-80 and 1896 Ordnance Survey Maps

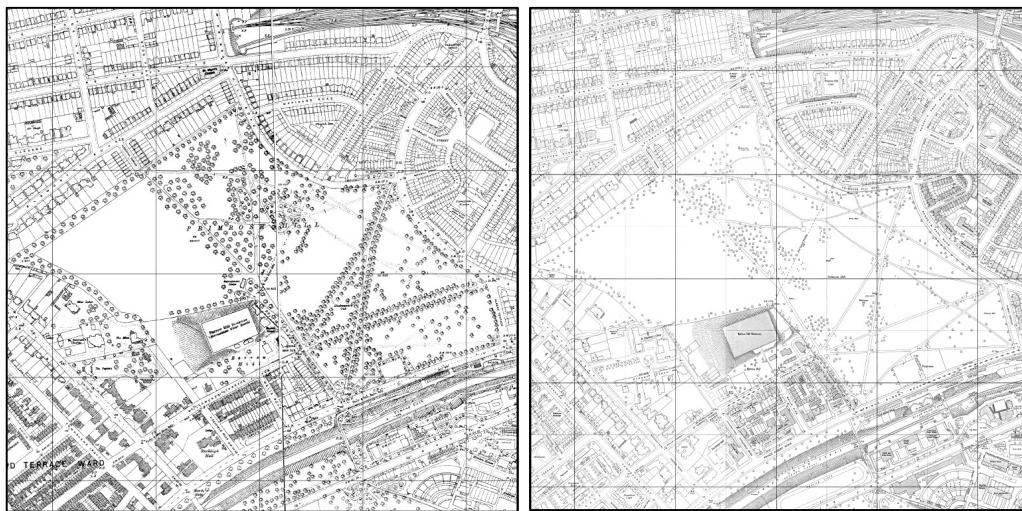
- 4.15 Following this, improvement works were undertaken to Primrose Hill between 1851 and 1900 which included the laying of an extensive footpath system with lamps along the main routes and some new planting (evident at Figures 4.3, 4.4 & 4.5).



Figure 4.5 – Primrose Hill c.1896

¹⁷ Historic England (2001) Register Entry for Primrose Hill
¹⁸ Historic England (2001) Register Entry for Primrose Hill

- 4.16 In 1864, an oak tree was planted by Samuel Phelps (1804-1878), a noted actor of the time, together with the Ministry of Works, on the south side of Primrose Hill, to commemorate the tercentenary of Shakespeare.¹⁹ This is identified on the subsequent ordnance survey maps (Figures 4.3, 4.4, 4.6 & 4.7) and remains today.
- 4.17 By the late 1860's Primrose Hill had become a popular place for public meetings, demonstrations and rallies and, around this time, a Guards Drill Ground, Entrance Lodge and a Refreshment Lodge were constructed to the west and south west.²⁰ Hyde Park was later chosen as an alternative area for demonstrations in the 20th century.²¹
- 4.18 By the early 20th century, built development surrounded Primrose Hill on three sides (north, east and west). Also during this time, the gymnasium to the south appears to have been removed (Figure 4.6).



Figures 4.6 & 4.7 – 1915 and 1960-69 Ordnance Survey Maps

- 4.19 At some point in the mid-20th century, the Refreshment Lodge was demolished and the Toilet Blocks and Children's Recreation Ground, part of the Site, was constructed (Figure 4.7). Extensive tree removal also appears to have taken place within Primrose Hill by the mid to late 20th century (Figures 4.6 & 4.7).
- 4.20 There has been little change to Primrose Hill since the mid-20th century, with the key exceptions being later alterations to the recreation ground and the construction of a circular hard surfaced viewing platform. It is noted within the register entry that Primrose Hill lost many of its mature trees during the storms of 1987 and 1990.²²

¹⁹ Cassell, Petter & Galpin (1878) Old and New London: Volume 5 – Primrose Hill and Chalk Farm [URL:<http://www.british-history.ac.uk>]

²⁰ Cassell, Petter & Galpin (1878) Old and New London: Volume 5 – Primrose Hill and Chalk Farm [URL:<http://www.british-history.ac.uk>]

²¹ Cassell, Petter & Galpin (1878) Old and New London: Volume 5 – Primrose Hill and Chalk Farm [URL:<http://www.british-history.ac.uk>]

²² Historic England (2001) Register Entry for Primrose Hill

Landscape and Architectural Significance

- 4.21 Primrose Hill covers an area of approximately 25 hectares, located to the north of Regent's Park. It rises steeply to a northern plateau from Prince Albert Road (which separates Primrose Hill and Regent's Park) before dropping down to the northern boundary at Elsworthy Road (Figure 4.8).



Figure 4.8 – View of Primrose Hill

- 4.22 There are various entrances into Primrose Hill, principally to the south west, south east and north east. There is only one entrance lodge (Figure 4.9), located to the south west, which dates to the mid to late 19th century (c.1870) and was constructed as part of the wider improvement works to the park.



Figure 4.9 – Entrance Lodge to Primrose Hill

- 4.23 The lodge is designed in a vernacular architectural style with restrained gothic detailing. It is constructed from stock brick with sandstone dressings (painted white) with moulded architraves to the doors and windows, large gables and tall projecting chimneystacks. There are no other buildings or structures within the park dating from this period.



Figure 4.10 – Views from the top of Primrose Hill

- 4.24 The landscape interest of Primrose Hill is principally derived from its advantageous position overlooking the City of London (Figure 4.10). The summit of the hill is 206 feet above the River Thames and is marked by a large modern concrete viewing platform decorated with the points of a compass.



Figure 4.11 – Path, Trees and Lighting to Primrose Hill

- 4.25 There is also interest from the parks plain open grassed areas which are cut by tarred paths and radiate across from points on the east perimeter paths and from the south west and south eastern corners. Those to the south of Primrose Hill are largely decorated with ornamental trees and lampposts (Figure 4.11).

- 4.26 To the west, the roofs of the covered structures of Barrow Hill Reservoir are partially screened by trees as are the 19th century housing developments on the northern and eastern boundaries. To the north-west, below the western slopes of the hill, modern sports pitches have been introduced.



Figure 4.11 – Toilet block to Primrose Hill

- 4.27 Below the southern slopes is a late 20th century children's recreation ground and mid-20th century toilet block, built near the site of the gymnasium made in 1847, now forming part of the Site (Figure 4.12). The boundary treatment to the park consists of various materials including railings, brick walls, clipped hedges and shrubberies (Figure 4.12).



Figure 4.12 – Boundary treatment to Primrose Hill along Prince Albert Road

- 4.28 Overall, the character and appearance of the park derives as a 'park for the people' with its associations derived from the need of the local people as opposed to landed gentry or aristocrats.

Contribution made by the Site to the Significance of Primrose Hill

- 4.29 As described in Section 3, the Site consists of the Toilet Block to Primrose Hill which was constructed in the mid-20th century on the site of the former Gymnasium from 1847. In some way it forms part of the historic development of Primrose Hill, illustrating the growing communal use of the park in the mid-20th century. However, the building itself is simple in its form and construction and is typical of this period and contributes little to the historic interest of the park as a whole. It is a modest single storey structure with hipped tiled roofs and reads as a collection of small elements with a central open covered seating area (figure 4.13). It is largely encircled by mature trees and the modern children's recreation ground which significantly reduces its visual prominence in the key view from the top of the hill.



Figure 4.13 – East elevation of the toilet block with central covered seating area

- 4.30 Overall, the Site is considered to only make a neutral contribution to the identified significance of Primrose Hill Registered Park and Garden.

5. Application Proposals and Heritage Impact Assessment

Introduction

- 5.1 The affected designated heritage asset of the grade II registered Primrose Hill Park and Garden has been identified and its significance described as part of this report, in sections 2 and 4.
- 5.2 The relevant heritage policy and guidance also set out in full in Appendix 1 of this report. This includes national policy set out in the NPPF 2012 and supported by the NPPG 2014, and local policy and guidance for the historic environment.
- 5.3 Together these sections and appendices of this report provide the appropriate context for the consideration of these proposals at final application stage, following recent planning process and officer discussions.

Application Proposals

- 5.4 The application submission comprises the alteration and extension of the existing toilet block accommodation within the Site to form a catering facility with associated external seating. The existing central covered seating area will be extended and its roof altered to form a gable roof to allow for the introduction of the café and associated kitchen facilities.
- 5.5 As part of the proposals, the area surrounding the site will be re-landscaped, particularly to the north, with the removal of metal railings and gates to provide a new welcoming approach to the cafe.
- 5.6 The accompanying Design and Access Statement, and scheme drawings package describe the new development in detail. This document also describes the evolution of the scheme and its design response in terms of the constraints and opportunities of the site and to stakeholder consultation.

Heritage Impacts

National Planning Policy Framework (NPPF 2012)

- 5.7 In accordance with paragraph 128 of the NPPF, the significance of the designated heritage asset affected by the application proposals, the grade II registered Primrose Hill, has been described in section 4 of this Statement. Consequently, the proposals have been informed by a clear understanding and appreciation of the historic development, character and appearance of the site and its surroundings.
- 5.8 Paragraph 131 highlights the need to take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. At the heart of the proposals is the desire to preserve the special interest of the historic landscape of Primrose Hill whilst improving its public facilities to the benefit of the park. This is in accordance with the key requirement of paragraph 131

which encourages local authorities to take account of the desirability of sustaining and enhancing the significance of all heritage assets; the positive contribution that the 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.

- 5.9 Paragraph 132 requires great weight to be given to the conservation of designated heritage assets and the more important the asset, the greater weight should be. Conservation is defined as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance²³. Overall the designated heritage assets would be conserved by these proposals and their significance both sustained or enhanced, and not harmed.
- 5.10 As stated in section 4, the existing building on the site is a 20th century structure which forms a modest addition to the registered parkland. The building is largely screened by dense vegetation in key views from within the parkland. Whilst of a fairly traditional unimposing design, it is considered that the building only makes a neutral contribution to the special historic interest of the registered parkland.
- 5.11 The proposed extension of the building has been carefully designed in response to the character of the building and its historic environment. The existing central covered seating area with its hipped roof will be adapted to form a café with a gabled roof and attractive exposed timber trusses to the east and west elevations. As highlighted in the accompanying Design and Access Statement, this proposed gabled design is considered to be the most visually appropriate roof form in relation to the existing building, following consideration of other roof models within the local area.
- 5.12 The upper sections of the roofs will be glazed with timber doors introduced to the ground floors of the two elevations. The extension will include a canopy to the eastern section to allow for sheltered external seating in association with the cafe. The northern and southern elements of the building will largely remain unaltered as part of the proposals. Overall, it is considered that the extension will visually improve the appearance of this modern building and provide a viable use for this largely underutilised central element, which is consistent with the character of its surroundings as a public park.
- 5.13 The proposed extension is suitably modest in terms of height and scale to ensure it remains in keeping with its parkland setting. The proposed extension is confined to the central section which will remain of the same height and thus the building, overall, will not unduly increase in prominence in key views within the park. Furthermore, the area immediately surrounding the building will be re-landscaped, removing part the railings to the north-west which presently forms part of the entrance to the toilets, and allowing for external seating. Overall, the area will be softened and improved by the landscaping works and allow this part of the Site to more successfully integrate into the surrounding parkland.
- 5.14 It has been demonstrated that the proposals will not cause harm to the significance of the identified designated heritage asset and thus the policy tests set out in paragraphs 133 and 134 of the NPPF are not considered to apply.

²³ DCLG, NPPF 2012 – para. 131 (Annex 2 - Glossary)

- 5.15 Overall, the building and its immediate landscaped surroundings will greatly improve the character and appearance of this part of the registered parkland without impact on the important panoramic viewpoint from the top of the hill. Importantly, it will also introduce an appropriate use which is consistent with the long term conservation of the designated heritage asset.

National Planning Policy Guidance (NPPG) 2014

- 5.16 The National Planning Policy Guidance (NPPG) which accompanies the NPPF was issued in March 2014 as a web-based resource. The proposals have had full regard to the guidance in relation to the conservation and enhancement of the historic environment.

Local Policy

London Plan (2015)

- 5.17 As demonstrated in this report and the accompanying drawings package, the proposals will conserve the significance of the designated heritage asset through the introduction of a modest high quality extension to the existing building to allow for the provision of a café. The new extension will be of an appropriate materiality, scale and height in keeping with its parkland surroundings. The area surrounding the building to the north-west will be re-landscaped to form an attractive external seating area. The resulting appearance of the site will be improved, removing modern features such as the metal railings and introducing visual interest to the building in the form of exposed timber gables. As such, the proposals are in accordance with policy 7.8 of the further alterations to the London Plan in terms of demonstrating how the objectives of valuing and conserving affected heritage assets have been addressed.

Camden Core Strategy (2010)

- 5.18 The proposals are also in accordance with policy CS14 of the Camden Core Strategy which seeks to promote high quality places and to conserve the Borough's heritage. In particular, the proposed new extension will be of the highest standard of design in keeping with its historic context. The proposed landscaping proposals immediately surrounding the site has sought to improve the building's immediate environment and provide a more successful integration with the wider parkland surroundings, in accordance with criterion's C and D of policy CS14 of the Core Strategy.
- 5.19 As demonstrated in section 4, due to the modest form of the building and the surrounding dense vegetation which form a green buffer or screen, important views from the parkland, notably that from the top of Primrose Hill, will be protected in accordance with criterion E of policy CS14.

Camden Development Policies (2010)

Overall, the proposals will enhance the appearance of this 20th century toilet block and its immediate landscaped surroundings. Through the introduction of a viable public use within an unutilised and partially redundant element of the building, the character and historic interest of the registered park of Primrose Hill will be, overall, improved. This is in accordance with policy DP25 of Camden's Development Policies 2010 (Conserving Camden's heritage) which seeks to protect the Borough's heritage assets including Parks and Gardens of Special Historic Interest. This is also in accordance with the draft

policy D2 of the Camden 2016 Local Plan and will as guidance on design as set out in Camden's Planning Guidance (2015), specifically CPG 1 (Design).

6. Summary and Conclusions

- 6.1 In accordance with the requirements of the NPPF (2012), the significance of the designated heritage asset which will be affected by the application proposals has been described in this Statement. This includes an assessment of the historic interest of the Grade II registered Primrose Hill.
- 6.2 Historically, the site formed part of the former 19th century gymnasium within the southern section of the park which was demolished in the early part of the 20th century. It consists of a late 20th century single-storey toilet block with central covered seating area, situated between the playground and outdoor gym. The modern building, whilst of a modest traditional design, makes only a neutral contribution to the special interest of the registered park and garden and would benefit from visual improvement.
- 6.3 The proposals will introduce a viable use for the central, underutilised element of the building which is consistent with the park as a public recreational space. The proposals have been carefully designed to respond to its historic context and will take the form of a pitched roof extension with exposed timber gables to the west and east elevations. The extension will be single storey to retain the modest form and character of the host building and be of an appropriate materiality and scale in keeping with its parkland setting. The area immediately to the north-west will be re-landscaped to allow for an external seating area and to improve the appearance of this part of the site and its relationship with the parkland.
- 6.4 Overall it is considered that the proposed extension and associated landscaping will improve the appearance and character of the site and also provide a much needed additional public facility in the form a café. This is an important heritage benefit. Furthermore, key elements of the registered park of Primrose Hill which contribute to its special historic interest, notably the view from the top of the hill towards London, will be protected and unaffected by this change.
- 6.5 In conclusion, the application proposals will sustain the significance of Primrose Hill Registered Park and Garden and those elements which contribute to its special historic interest. The proposals will therefore be in accordance with national policy set out in the NPPF 2012 and supported by the NPPG (2014), policy 7.8 of the further alterations to the London Plan 2015, Policy CS14 of Camden's Core Strategy (2010), Policy DP25 of Camden's Development Policies (2010) and draft policy D2 of the Camden Local Plan (2016).

Appendix 1: Heritage Policy and Guidance

National Policy

National Planning Policy Framework, 2012

The National Planning Policy Framework (The Framework) was introduced in March 2012 as the full statement of Government planning policies covering all aspects of the planning process. One of the twelve core planning principles of the NPPF is that planning should:

“conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.”

Chapter 12 outlines the Government’s guidance regarding conserving and enhancing the historic environment. Paragraph 128 outlines the information required to support planning applications affecting heritage assets. It states that applicants should provide a description of the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset’s importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 129 sets out that local planning authorities should also identify and assess the particular significance of heritage assets that may be affected by proposals. They should take this assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.

Paragraph 131 states that local planning authorities should take account of the desirability of sustaining and enhancing the significance of all heritage assets and putting them into 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.

Paragraph 132 further outlines that local planning authorities should give great weight to the asset’s conservation when considering the impact on a proposed development on the significance of a designated heritage asset, such as the listed buildings. The more important the heritage asset, the greater the weight should be. It is also specified that any harm to, or loss, of significance of a designated heritage asset should require clear and convincing justification.

Paragraph 133 outlines that local planning authorities should refuse consent where a proposal will lead to substantial harm or total loss of significance, unless it can be demonstrated that this is necessary to deliver substantial public benefits that outweigh such harm or loss, or a number of other tests can be satisfied.

Paragraph 134 concerns proposals which will lead to less than substantial harm to the significance of a designated heritage asset. Here harm should be weighed against the public benefits, including securing the optimum viable use.

Paragraph 137 encourages local planning authorities to look for opportunities for new development within conservation areas and within the setting of heritage assets, such as listed buildings, to enhance or better reveal their significance. It also states that proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of a heritage asset should be treated favourably.

National Guidance

NPPG: National Planning Policy Practice Guidance 2014

National Planning Practice Guidance 2014 has been issued by the Government as a web resource and living document, including a category on conserving and enhancing the historic environment. This is intended to provide more detailed guidance and information with regard to the implementation of national policy set out in the NPPF 2012.

The NPPG 2014 helps to define some of the key heritage terms used in the NPPF. With regard to substantial harm, it is outlined that in general terms this is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special interest. Optimum viable use is defined in the NPPG as the viable use likely to cause the least harm to the significance of the heritage asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes.

Public benefits are also defined in the NPPG 2014, as anything that delivers economic, social and environmental progress as described in the NPPF 2012. Public benefits should flow from the proposed development, and they may include heritage benefits.

National Advice

Historic England: Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment 2015

GPA Note 2 provides information to assist in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guidance (NPPG). These include; assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, and marketing.

With regard to design and local distinctiveness, advice sets out that both the NPPF (section 7) and NPPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:

- *The history of the place*
- *The relationship of the proposal to its specific site*
- *The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept*
- *The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size*
- *The size and density of the proposal related to that of the existing and neighbouring uses*
- *Landmarks and other built or landscape features which are key to a sense of place*
- *The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces*

- *The topography*
- *Views into, through and from the site and its surroundings*
- *Landscape design*
- *The current and historic uses in the area and the urban grain*
- *The quality of the materials*

Local Policy and Guidance

The development plan for the City of Westminster comprises the Further Alterations to London Plan 2015, Westminster's City Plan: Strategic Policies 2013, and the "saved" policies of the Unitary Development Plan 2007. These documents provide local guidance with regard to development affecting heritage assets, and should accord with the statutory duties and the general principles outlined in the Framework.

Further Alterations to the London Plan 2015

The London Plan was adopted by the Greater London Authority in July 2011 and sets out the Spatial Development Strategy for all Boroughs within Greater London. It replaces the London Plan (consolidated with alterations since 2004), which was published in February 2008. The Plan has been subsequently revised to ensure consistency with the Framework and other changes since 2011, and the Further Alterations to the London Plan were published on 10th March 2015.

Policy 7.8 (Heritage assets and archaeology) states that:

"Strategic

A London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

B Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

Planning decisions

C Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

D Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

E New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset ..."

London Borough of Camden Core Strategy 2010

The Core Strategy was adopted by the London Borough of Camden in 2010 and sets out the key elements of the Borough's vision.

Policy CS14 seeks to promote high quality places and conserve the Borough's heritage by ensure Camden's places and buildings are attractive, safe and easy to use. This will be achieved by undertaking the following:

“(a) requiring development of the highest standard of design that respects local context and character;

(b) preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;

(c) promoting high quality landscaping and works to streets and public spaces;

(d) seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible;

(e) protecting important views of St Paul's Cathedral and the Palace of Westminster from sites inside and outside the borough and protecting important local views.”

London Borough of Camden Development Policies 2010

The development policies for the London Borough of Camden set out detailed planning criteria used to assist in determining planning applications within the Borough.

Policy DP25 seeks to conserve Camden's heritage such as listed buildings and conservation areas. Detailed criteria in relation to Registered Parks and Gardens are not highlighted in this policy however; it states that the council will seek to protect heritage assets such as Parks and Gardens of Special Historic Interest.

London Borough of Camden Local Plan 2016

In June 2016, the council submitted the Camden Local Plan and its supporting documents to the Secretary of State for Communities and Local Government for independent examination. The document is therefore yet to be formally adopted therefore the policies contained within the document carry some weight.

Policy D2 (Heritage) states that:

“...Other heritage assets and non-designated heritage assets

The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.

The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.”

Appendix 2: Register Entry for Primrose Hill

PRIMROSE HILL

List Entry Summary

This garden or other land is registered under the Historic Buildings and Ancient Monuments Act 1953 within the Register of Historic Parks and Gardens by English Heritage for its special historic interest.

Name: PRIMROSE HILL

List entry Number: 1001526

Location

The garden or other land may lie within the boundary of more than one authority.

County: Greater London Authority

District: Camden

District Type: London Borough

Parish:

National Park: Not applicable to this List entry.

Grade: II

Date first registered: 02-May-2001

Date of most recent amendment: Not applicable to this List entry.

Legacy System Information

The contents of this record have been generated from a legacy data system.

Legacy System: Parks and Gardens

UID: 4815

Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

List entry Description

Summary of Garden

Legacy Record - This information may be included in the List Entry Details.

Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

History

Legacy Record - This information may be included in the List Entry Details.

Details

Mid-C19 public park added to Regent's Park in 1841.

HISTORIC DEVELOPMENT

Until mid-C 19 Primrose Hill was farmland with hedgerow boundaries and a few trees surviving from the ancient Middlesex Forest (William Gillespie and Partners p18). However since 1822 the owners, Eton College, had been planning to divide the hill into building plots. In 1829 plans were drawn up to develop the whole of the hill, the plans included new road links to the north but no offers were made for them. In 1831 a private individual leased the hill intending to sub-let it to the Royal Botanical Society and, in 1836, the London Cemetery Company made an application for land for a burial ground. Neither of these proposals was approved. Following a recommendation from the government, the Crown Commissioners, in 1838, offered to buy Primrose Hill from Eton College in order to form an extension of Regent's Park and the site became Crown property in 1841. In the following year, after an Act had been passed securing the land as public open space, the public was freely admitted. The boundaries were marked by an oak fence and hedgerows were removed, a year later the bridge connecting Regent's Park with Primrose Hill was completed and opened. A Gymnasium was built near to the southern boundary c1847.

In 1851 Primrose Hill, along with the parkland of Regent's Park, was transferred, by means of the Crown Land Act, from the management of the Commissioners of Woods, Forests and Chases, to the newly formed Ministry of Works. The new management soon tackled the problems of drainage and levels, especially in the north and west where ponds and hollows were considered dangerous to the public. The improvement work was carried out intermittently between 1851 and 1900 and included the laying of an extensive footpath system with lamps along the main routes and some new planting.

By the 1860s Primrose Hill had become a popular place for public meetings, demonstrations and rallies and, around this time, an area to the east was set aside as a Guards Drill Ground and a Refreshment Lodge was built to the west. By the turn of the century buildings surrounded Primrose Hill on three sides.

In the year 2000 Primrose Hill remains the property of the Crown, and, along with Regent's Park, is managed by the Royal Parks Authority as public park.

SITE DESCRIPTION

LOCATION, AREA, BOUNDARIES AND LANDFORM Primrose Hill is situated to the west of London, immediately to the north of Regent's Park (qv GD1156) and c1km west of Euston

Station. Green Park (qv GD1799) lies c3km to the south and Hampstead Heath c3km to the north. The 25ha of Primrose Hill rise steeply to a northern plateau before dropping down to the northern boundary. To the south, Primrose Hill is separated from Regent's Park by Prince Albert Road and is bounded to the north by the backs of houses and school buildings in Elsworthy Road, with Primrose Hill Road, Regent's Park Road and Albert Terrace making for the eastern boundary. The boundary to the south-west is largely made up from Barrow Hill, a covered reservoir made to supply water to the villas in and around Regent's Park in 1828. The boundary to the north-west is made up from the backs of houses on Avenue Road. The site is enclosed with various materials including railings, brick wall, clipped hedges and shrubberies.

ENTRANCES AND APPROACHES Primrose Hill is entered from a number of points around the site. The entrance to the south-west, from Prince Albert Road, is guarded by brick built Primrose Hill Lodge (c1870). After standing empty for a number of years the Lodge was refurbished in the late C20. The grounds around the lodge are separated from the park by C20 iron railings.

THE PARK The steeply rising hill is laid to grass and cut by tarred paths which radiate across from points on the east and west perimeter paths and from the south-west and south-eastern corners. The paths to the south are largely decorated with ornamental trees, Primrose Hill lost many of its mature trees during the storms of 1987 and 1990. A path runs north-west from the south-eastern corner and continues, slightly to the east of centre, to the circular hard surfaced view point at the summit of the hill. From this point, which in the late C20 was marked with the points of the compass, the panorama of the city of London can be viewed. To the west, the roofs of the covered structures of Barrow Hill Reservoir are partially screened by trees as are the C 19 housing developments on the northern and eastern boundaries. To the north-west, below the western slopes of the hill sports pitches have been made. Below the southern slopes is a late C20 children's recreation ground, built near the site of the gymnasium made in 1847.

REFERENCES

Printed material William Gillespie and Partners, The Regents Park; Royal Parks Survey, 198 1. (This report contains numerous references and maps. The Royal Parks Review Group, Royal Parks Review, St James and Green Parks, Regents Park and Primrose Hill, 1993, pp41-84

Maps G.Richardson, Marylebone Park Farm, 1794 Barnett and Britton, Survey of St Marylebone and Paddington, 1834 Plan of Regent's Park and Primrose Hill Estate belong to the Crown, 1850 W A Nesfield, Plan for Avenue Garden, 1864 First edition Ordnance Survey, 25" to one mile, 1870 Second edition Ordnance Survey, 25" to one mile, 1895 Description written: September 2000 Register Inspector: LCH

Selected Sources

Legacy Record - This information may be included in the List Entry Details

National Grid Reference: TQ 27594 83909

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