



Historic England

LONDON OFFICE

Mr Gavin Sexton
London Borough of Camden
Development Management
Town Hall
Judd Street
London
WC1H 9JE

Direct Dial: 020 7973 3774

Our ref: P00613953

14 July 2017

Dear Mr Sexton

**Arrangements for Handling Heritage Applications Direction 2015 &
T&CP (Development Management Procedure) (England) Order 2015
MORRISONS SUPERSTORE AND PETROL FILLING STATION CAMDEN GOODS
YARD CHALK FARM ROAD LONDON NW1 8EH
Application No 2017/3847/P**

Thank you for your letter of 7 July 2017 notifying Historic England of the above application. We have been involved in pre-application discussions with the applicant, and the advice set out here reflects our earlier advice.

Summary

The proposals have the potential to improve the settings of various designated heritage assets of this part of Camden, but could also cause some harm. The proposals need to be assessed in accordance with paragraph 134 of the NPPF, and only granted permission if it is clear that the harm identified is outweighed by public benefits.

Historic England Advice

Significance

The significance of this part of Camden is principally derived by a combination of Victorian railway and canal infrastructure, and earlier planned residential neighbourhoods. The proposal site is not within a conservation area, but it is surrounded by or near several conservation areas (Regent's Canal CA; Primrose Hill CA; Harmood Street CA), and is close to several listed buildings, the most significant of which is the grade II* listed Roundhouse to the north.

Proposals

The proposals are for the complete redevelopment of the existing Morrison's supermarket and adjoining car park, both of which detract from the built environment of the area and are specifically excluded from the Regent's Canal Conservation Area. The proposals are for a new master plan creating new public spaces and connections to existing streets beyond, and for the construction of a range of mixed-use buildings



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for retail, commercial and creative workspaces and residential use. The tallest of these is proposed for 14 stories. The principal material for the buildings is brick to reflect the industrial context of the area.

Policy Context

Both Section 16 and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and their settings.

Section 72 of the same Act sets out the statutory duty on local planning authorities to pay special regard to preserving or enhancing the character or appearance of conservation areas.

Government guidance on how to carry out those duties is found in the National Planning Policy Framework (NPPF). At the heart of the framework is a presumption in favour of 'sustainable development' where conserving heritage in a manner appropriate to their significance is one of the 12 core principles.

NPPF policy advises that for new development to be sustainable it needs to encompass an economic, social and environmental role, with the latter (paragraph 7) 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.

Section 12 of the NPPF sets out how the historic environment should be conserved and enhanced and makes it clear at paragraph 132 that when considering the impact of a proposed development on a heritage asset (which includes its setting), 'great weight' should be given to preserving its significance. Harm to significance should be exceptional and any harm or loss should require clear and convincing justification.

Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is substantial, or less than substantial. If the harm is deemed to be less than substantial, paragraph 134 of the NPPF requires that harm to be weighed against the public benefits of the proposals.

If the harm is substantial, or results in a total loss of significance, paragraph 133 sets out more rigorous criteria to address.

Position

We welcome the redevelopment of the site, which currently detracts from this part of Camden Town. We believe there is much scope for urban enhancement here, and we broadly support the master plan, its mix of uses and the general design approach. The proposed height of the tallest elements of the proposals will, however, have impacts that go beyond the immediate development area. These includes impacts on parts of Primrose Hill Conservation Area through the introduction of larger scale development visible in some views where the immediate context is one of traditionally scaled historic buildings; on the grade I registered Regent's Park where the development would be visible above the tree line; and on the setting of the grade II* listed



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Roundhouse in some views from Haverstock Hill where the prominence of the Roundhouse would be diminished by the larger new development in the backdrop.

In our view, however, the harm identified above is modest and could be outweighed by public benefits in accordance with Paragraph 134 of the NPPF. In that regard, we urge you to liaise with Camden Council in order to ensure that the harm is mitigated as far as possible and clearly outweighed by public benefits.

Recommendation

Your Council should be satisfied that the less than substantial harm identified above is outweighed by public benefits before you grant permission for the proposals.

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

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