

# Heritage Statement: Addendum

Camden Goods Yard (Morrisons Site, Chalk Farm Road), London

July 2020

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**Client**  
| St George West London Limited

**Our reference**  
STGH3003

July 2020

# 1. Introduction

## Purpose of this Report and Context

- 1.1 This Heritage Statement Addendum has been prepared by Turley Heritage on behalf of St George West London Limited ('the Applicant'), to assess the built heritage impacts of the proposed s73 application ('the July 2020 s73 application' also referred to as 'the optimisation scheme' in the application material) to vary the extant planning permission<sup>1</sup> for the Camden Goods Yard project. The Design and Access Statement Addendum provides the full description of development.

## Background

- 1.2 In June 2017, an application for full planning permission<sup>2</sup>, was submitted by Safeway Stores Limited and BDW Trading Limited to the London Borough of Camden (LBC) for the redevelopment of a 3.26 hectare (ha) site located off Chalk Farm Road, adjacent to Juniper Crescent and Gilbeys Yard in Chalk Farm, Camden (the 'application site') to deliver the following arranged over eight blocks, ranging from 5 to 14 storeys in height:
- Morrisons Supermarket (MS) Parcel: 573 residential units (60,568 m<sup>2</sup> gross external area (GEA)); office space (4,867 m<sup>2</sup> GEA); workshops (779 m<sup>2</sup> GEA); affordable workspace (565 m<sup>2</sup> GEA); a Morrisons Supermarket (19,963 m<sup>2</sup> GEA); retail (787 m<sup>2</sup> GEA); community centre (86 m<sup>2</sup> GEA); and an urban farm (1,298 m<sup>2</sup> GEA).
  - Morrisons Petrol Filling Station (PFS) Parcel: retail (1,627 m<sup>2</sup> GEA); office (8,114 m<sup>2</sup> GEA); and winter garden (329 m<sup>2</sup> GEA).
- 1.3 Planning permission was granted by the LBC in June 2018 ('the June 2018 consented scheme'). In granting planning permission for the June 2018 consented scheme, the Council's planning committee agreed with the officer's report and determined that the less than substantial harm to a small number of heritage assets was outweighed by the significant public and regeneration benefits that would be delivered.
- 1.4 Subsequent to the grant of planning permission for the June 2018 consented scheme, the Council granted the following non-material amendments to the June 2018 consented scheme:
- 06 February s96A 2019 application to make minor changes to the wording of planning conditions 47, 48 and 49 attached to the June 2018 consented scheme<sup>3</sup>.
  - 04 July 2019 s96A application to make minor changes to planning conditions 29, 50 and 60 attached to the June 2018 consented scheme<sup>4</sup>.

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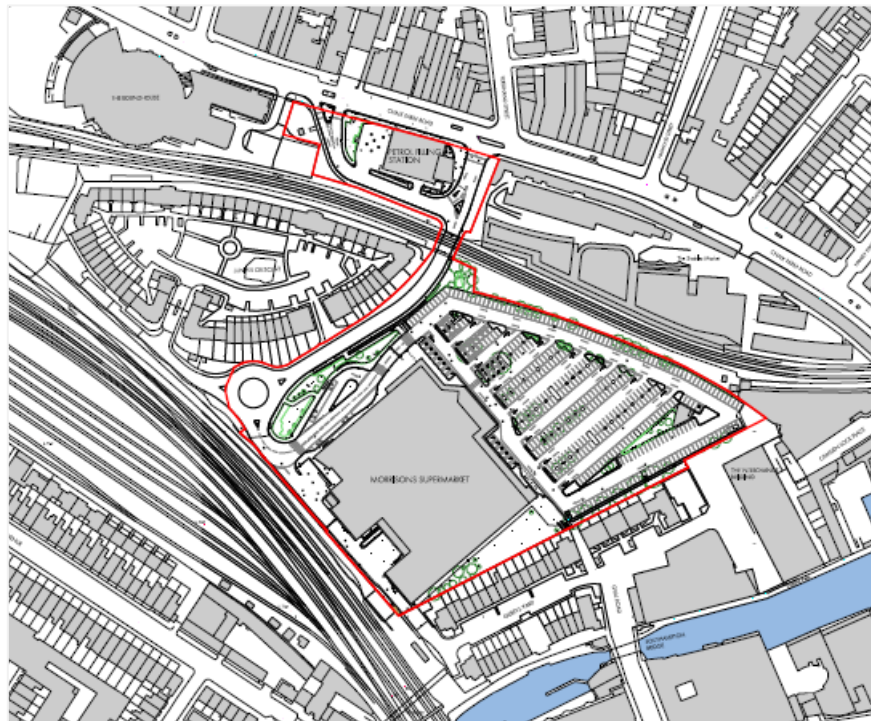
<sup>1</sup> Application ref.: 2017/3847/P

<sup>2</sup> Application ref.: 2017/3847/P

<sup>3</sup> Application ref.: 2019/0153/P

<sup>4</sup> Application ref.: 2019/2962/P

- 1.5 In December 2019, the Applicant submitted a s96A non-material amendment application<sup>5</sup> to amend the proposed development description relating to the PFS Parcel of the June 2018 consented scheme. This was followed in January 2020 by a S73 application for a minor material amendment to the June 2018 consented scheme<sup>6</sup> (the 'January 2020 s73 application') relating to the PFS Parcel. The amendments to the PFS Parcel were in respect of the construction start date; the construction method of the temporary store; the operation period of the temporary store; car parking provision; and, delivery access arrangements. The January 2020 S73 application was granted consent on 5 May 2020 resulting in the 'May 2020 consented scheme'.
- 1.6 The July 2020 s73 application seeks permission to amend the May 2020 consented scheme. The proposed amendments for the July 2020 s73 MMA application relate to the Morrisons Supermarket (MS) Parcel of the May 2020 consented scheme (Figure 1.1).



**Figure 1.1: Site Plan**

- 1.7 The July 2020 s73 application comprises the proposed amendments (collectively referred to as the 'July 2020 proposed amendments') in respect of Blocks A, B, C and F of the MS Parcel, identified in detail within the Design and Access Statement Addendum and identified here for ease of reference:
- Deepening an area of 300 m<sup>2</sup> within the basement footprint by approximately 4 m to create a two-level basement under Block A.
  - Concierge facilities will be moved from Block E to Block A.

<sup>5</sup> Application ref.: 2019/6301/P

<sup>6</sup> Application ref.: 2020/0034/P

- Updated basement and lower ground floor layout to account for the following:
  - Relocation of plant and updated car parking layout.
  - Introduction of a cinema, pool, gym and associated facilities beneath Block A.
  - Repositioning of energy centre within the basement, to shift further east beneath Block A.
- Introduction of one to two additional floors to Blocks A-C and F as follows (excluding plant enclosures) to accommodate an additional 71 homes:
  - Block A1 to increase from 14 to 15 floors (approximately 0.91m increase from 84.170m AOD to 85.075m AOD).
  - Block A2 to increase from 11 to 12 floors (approximately 1.58m increase from 74.050m AOD to 75.625m AOD).
  - Block B1 to increase from 7 to 8 floors (approximately 2.70m increase from 62.075m AOD to top of proposed urban farm to 64.775m AOD to top of proposed urban farm).
  - Block B2 to increase from 6 to 7 floors (approximately 6.13m increase from 55.950m AOD to 62.075m AOD).
  - Block C to increase from 8 to 10 floors (approximately 4.65m from 64.125m AOD to 68.775m AOD); and 10 to 11 floors to the tallest part of the block set back from the application site boundary (approximately 1 m from 71.250m AOD to 72.250m AOD).
  - Block F2 to increase from 9 to 11 floors (approximately 4.90m increase from 67.315m AOD to 72.210m AOD, approximately 6.56m increase to 73.875m AOD when including the proposed new plant enclosure).
- Decrease of 717 m<sup>2</sup> GIA in the overall provision of commercial space from 26,904m<sup>2</sup> to 26,187m<sup>2</sup> GIA, within increases in the provision of retail, office, affordable workspace, and urban farm spaces, and decreases in the provision of supermarket (A1) and workspace.
- Reduction in a total of 47 car parking spaces as follows:
  - Foodstore to decrease by 50 car parking spaces from 300 to 250 car parking spaces; and
  - Residential to increase by three car parking spaces from 20 to 23 car parking spaces.
- Increase of 142 residential and 21 commercial long stay cycle parking spaces through the following changes to Blocks A-C and F;

- Block A to increase from 148 to 173 residential cycle spaces (increase in 25 cycle spaces) and from 12 to 13 commercial cycle spaces (increase in 1 cycle space);
  - Block B to increase from 218 to 288 residential cycle spaces (increase in 70 cycle spaces) and from 39 to 43 commercial cycle spaces (increase in 4 cycle spaces);
  - Block C to increase from 132 to 157 residential cycle spaces (increase in 25 cycle spaces) and from 8 to 22 commercial cycle spaces (increase in 14 cycle spaces); and
  - Block F to increase from 246 to 268 residential cycles spaces (increase in 22 cycle spaces) and from 12 to 14 commercial cycle spaces (increase in 2 cycle spaces).
- Increase of 18 visitor short stay spaces for both residential and non-residential elements across the main site and PFS in communal areas, from 80 to 98 spaces.
  - Increase in private amenity space from 3,209m<sup>2</sup> to 3,436m<sup>2</sup>.
  - Increase of 1,031 m<sup>2</sup> in the total area of communal amenity, play space and landscaping through the following:
    - Civic space to increase from 6,155m<sup>2</sup> to 7,481m<sup>2</sup>.
    - Green amenity space to decrease from 3,490m<sup>2</sup> to 2,947m<sup>2</sup>.
    - Play Space to increase from 1,115m<sup>2</sup> to 1,265m<sup>2</sup>.
    - Food growing to increase from 463m<sup>2</sup> to 561m<sup>2</sup>.
  - Minor amendments to elevational treatments, including the additional height and some relocations of windows, the removal of all glass balustrades and timber cladding in line with changes to Part B (Fire) of the building regulations and replacement with open vertical metal bars and timber with folded metal cladding, and the use of lighter brick for Block B and F courtyard elevations to enhance daylight of the courtyard and homes facing into it.
  - Update of demolition and construction programme with the year of opening changing from Q4 2023 to Q4 2027.

1.8 The May 2020 consented scheme, as amended by the July 2020 s73 application, is hereafter referred to as the 'July 2020 amended proposed development'.

1.9 There are no proposed amendments to the appearance, height and massing of the remaining blocks (E1, E2 and D) of the MS Parcel or the PFS Parcel as established by the May 2020 consented scheme, such as the ventilation, access and servicing, which require assessment as part of this report.

- 1.10 There are minimal changes to the authorised elevations of the May 2020 consented scheme, the most significant being the removal of all glass balustrades and timber cladding due to the changes to Part B (Fire) of the Building Regulations; these balustrades are all replaced with open vertical metal bars as per the bay studies and timber with folded metal cladding. The authorised brick texture and colour remains unchanged, except for the Block B and F courtyard elevations, where a lighter brick is proposed to enhance the daylight of the courtyard space and the homes facing into the courtyard. These are not matters that would materially change the previously assessed heritage impacts of the May 2020 consented scheme.
- 1.11 Accordingly, it is only the amendments to the proposed heights of Blocks A1, A2, B, C and F2 and changes to the detailed design of the proposed landscaping that have potential implications for impacts on the significance of the relevant built heritage assets. These amendments have been considered in this Addendum in the context of assessing the impacts of the July 2020 amended proposed development as a whole. This Addendum uses the Heritage Statement (June 2017) and Supplementary Comment: Impact of Proposed Development on Regent's Park (October 2017) as a framework in assessing the impacts of the July 2020 amended proposed development.
- 1.12 This Addendum report is a Technical Appendix to the July 2020 EIL and informs its findings. Accordingly, these two reports should be read in conjunction with each other. The Heritage Statement Addendum should also be read in conjunction with the following:
- June 2017 Environmental Statement (ES) Volume 2B Heritage Assessment (including Heritage Statement) that accompanied the 2017 full planning application;
  - Supplementary Comment: Impact of Proposed Development on Regent's Park (October 2017); and
  - January 2020 Environmental Implications Letter (EIL) that accompanied the January 2020 S73 application, which concluded no change to the conclusions of the 2017 ES in respect of Heritage.
- 1.13 The accurate visual representations (AVRs) contained within Townscape and Visual Impact Assessment Addendum: Updated Verified Views Appendix of the July 2020 EIL have informed the assessment in this report.
- 1.14 As noted earlier in this Section, the built heritage impacts of the July 2020 amended proposed development has been assessed in its entirety in this Heritage Statement Addendum, having regard to the previously assessed impacts of the May 2020 consented scheme. For ease of reference, however, where there are no proposed amendments to previously consented elements associated impacts assessed in the Heritage Statement (June 2017), Supplementary Comment: Impact of Proposed Development on Regent's Park (October 2017) and January 2020 EIL, then such elements have not been specifically considered as part of this report, to allow for proportionate reporting.

- 1.15 In addition, the Design and Access Statement Addendum, prepared by Allies and Morrison Architects provides the overarching technical and design analysis, which helps inform the content of this Addendum. The Planning Statement Addendum, prepared by Turley, provides an overall assessment of the July 2020 amended proposed development's performance against planning policy and articulates the overall planning balance.
- 1.16 In light of Government advice and restrictions arising from Covid-19, this Heritage Statement Addendum has been prepared as a desk-based review, informed by the extensive knowledge of the application site and local context arising from the work undertaken as part of the June 2018 consented scheme and work on other sites located nearby.
- 1.17 This report does not consider archaeological heritage matters.

### **Report Structure**

- 1.18 The structure of the report is:
- **Section 2:** Review of relevant legislative and policy context.
  - **Section 3:** Review of built heritage baseline.
  - **Section 4:** Built heritage impact assessment of the July 2020 amended proposed development, having regard to the conclusions of the Heritage Statement (June 2017) and the Supplementary Comment: Impact of Proposed Development on Regent's Park (October 2017).
  - **Section 5:** Summary and Conclusions.



## 2. Review of Legislative and Policy Context

### Statutory Duties

- 2.1 The relevant legislation relating to built heritage matters, as referred to within the Heritage Statement (June 2017) and the Supplementary Comment: Impact of Proposed Development on Regent's Park (October 2017) remain extant, unchanged and valid. This includes s66 and s72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

### National Planning Policy Framework

- 2.2 The National Planning Policy Framework (NPPF) has been updated and re-published, since the heritage assessment reports were prepared. The most recent version, published in June 2019, sets out the government's planning policies for England. The policies specific to built heritage matters are not materially different from those in the 2012 publication.
- 2.3 The following paragraphs are relevant to heritage considerations for the current application.
- Paragraph 189 requires the significance of the heritage assets, which may be affected by the proposals to be described as part of any submission. The level of detail should be proportionate to the importance of the assets and sufficient to understand the potential impact of the proposals on their significance.
  - Paragraph 190 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 192 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 193 further outlines that local planning authorities should give great weight to the asset's conservation when considering the impact of a proposed development on the significance of a designated heritage asset, such as listed buildings and conservation areas. The more important the heritage asset, the greater the weight should be.
  - Paragraph 194 stipulates that any harm to, or loss of, the significance of a designated heritage asset, should require clear and convincing justification. Substantial harm to, or loss of, grade II listed buildings, or grade II registered

parks or gardens, should be exceptional. Assets of the highest significance, such as scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, and grade I and II\* registered parks and gardens and world heritage sites, should be wholly exceptional.

- Paragraph 195 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 196 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 200 encourages local planning authorities to look for opportunities for new development within conservation areas and within the setting of heritage assets, such as the 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.
- Paragraph 201 states that not all elements of a conservation area or world heritage site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the conservation area or world heritage site should be treated either as substantial harm under paragraph 195, or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the conservation area or world heritage site as a whole.

## **Development Plan**

- 2.4 The London Plan (2016) remains unchanged as part of the Development Plan, although the Mayor is at an advanced stage of preparing a replacement London Plan.
- 2.5 The previous Camden Local Plan, comprising the Core Strategy DPD (2010) and Development Policies DPD (2010) have been superseded and replaced by the Camden Local Plan (2017).

## **Camden Local Plan**

- 2.6 The Local Plan was adopted by the Council on 3 July 2017 as the basis for planning decisions and future development in the borough.
- 2.7 Under policy D1 (Design), the Council will seek to secure high quality design in development. The Council will require that development:
- (a) *“respects local context and character;*

- (b) *preserves or enhances the historic environment and heritage assets in accordance with Policy D2 - Heritage;*
- (c) *is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
- (d) *is of sustainable and durable construction and adaptable to different activities and land uses;*
- (e) *comprises details and materials that are of high quality and complement the local character;*
- (f) *integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
- (g) *is inclusive and accessible for all;*
- (h) *promotes health;*
- (i) *is secure and designed to minimise crime and antisocial behaviour;*
- (j) *responds to natural features and preserves gardens and other open space;*
- (k) *incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
- (l) *incorporates outdoor amenity space;*
- (m) *preserves significant and protected views;*
- (n) *for housing, provides a high standard of accommodation; and*
- (o) *carefully integrates building services equipment.*

*The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions."*

2.8 Policy D1 (Design) also includes a section relating to the location and provision of tall buildings within the borough. Policy D1 states that:

*"All of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against the design criteria set out above and we will also give particular attention to:*

- (p) *how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline;*
- (q) *the historic context of the building's surroundings;*

- (r) *the relationship between the building and hills and views;*
- (s) *the degree to which the building overshadows public spaces, especially open spaces and watercourses; and*
- (t) *the contribution a building makes to pedestrian permeability and improved public accessibility.*

*In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability.”*

2.9 Policy D1 has similar objectives to that of Policy DP24 within the Camden Development Policies, 2010-2025, in that it seeks to promote contextual designs of a high quality architectural design. Policy D1 differs in that there is a greater level of detail in determining appropriate locations of tall buildings within the borough. The principle of taller buildings on the application site was approved as part of the May 2020 consented scheme. The location remains, in policy terms, acceptable for tall buildings, subject to assessment of the relevant impacts, including on the significance of built heritage assets.

2.10 Policy D2 (Heritage) regards the conservation of Camden’s heritage. It outlines the objective of preserving and enhancing Camden’s rich and diverse heritage assets and their settings:

*“The Council will preserve and, where appropriate, enhance 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 and locally listed heritage assets.*

*Designated heritage assets*

*Designated heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- (a) *the nature of the heritage asset prevents all reasonable uses of the site;*
- (b) *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- (c) *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- (d) *the harm or loss is outweighed by the benefit of bringing the site back into use.*

*The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.*

### *Conservation areas*

*Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.*

*The Council will:*

- (e) require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- (f) resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- (g) resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
- (h) preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.*

### *Listed Buildings*

*Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:*

- (i) resist the total or substantial demolition of a listed building*
- (j) resist proposals for a change of use or alterations or extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and*
- (k) resist development that would cause harm to significance of a listed building through an effect on its setting.*

### *Archaeology*

*The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.*

### *Views*

*A number of London's most famous and valued views originate in, or extend into, Camden. These are:*

- views of St Paul's Cathedral from Kenwood, Parliament Hill and Primrose Hill;*

- views of the Palace of Westminster from Primrose and Parliament Hills; and
- background views of St Paul's from Greenwich and Blackheath.

*The Council will protect these views in accordance with London-wide policy and will resist proposals that would harm them. Where existing buildings that affect a view are redeveloped it is expected that any replacement building will be of a height that does not harm the view. The current framework for protecting these views is set by the London Plan (policies 7.11 and 7.12) and the Mayor's London View Management Framework supplementary planning guidance.*

*The Council will also consider the impact of a scheme, in terms of the townscape, landscape and skyline, on the whole extent of a view ('panorama'), not just the area in the view corridor. Developments should not detract from the panorama as a whole and should fit in with the prevailing pattern of buildings and spaces. They should seek to avoid buildings that tightly define the edges of the viewing corridors and not create a crowding effect around the landmark.*

*The Council will also seek to protect locally important views that contribute to the interest and character of the borough. These include:*

- *views of and from large public parks and open spaces, such as Hampstead Heath, Kenwood Estate, Primrose Hill and Regent's Park, including panoramic views, as well as views of London Squares and historic parks and gardens;*
- *views relating to Regent's Canal;*
- *views into and from conservation areas; and*
- *views of listed and landmark buildings, monuments and statues (for example, Centrepoint, St Stephen's, Rosslyn Hill and St George's, Bloomsbury).*

*The Council will seek to ensure that development is compatible with such views in terms of setting, scale and massing and will resist proposals that we consider would cause harm to them. Development will not generally be acceptable if it obstructs important views or skylines, appears too close or too high in relation to a landmark or impairs outlines that form part of the view. Further guidance on important local views is set out in our supplementary planning documents, for example in individual conservation area statements, appraisals and management strategies."*

*"The Council recognises that neighbouring boroughs have identified views for protection in supplementary planning documents and that development on some sites within Camden could affect these views. The Council will take into consideration these protected views of neighbouring authorities when deciding planning applications."*

- 2.11 Whilst the relevant policies in the Camden Local Plan are more extensive than the previous Development Plan documents, they are in broad alignment with the requirements of the NPPF.

## **Other Guidance and Material Considerations**

- 2.12 A number of guidance documents have been updated or superseded since the preparation of the Heritage Statement (June 2017) and the Supplementary Comment: Impact of Proposed Development on Regent's Park (October 2017).

### **National Planning Practice Guidance 2019**

- 2.13 The National Planning Practice Guidance is a web resource, which provides more detailed guidance and information with regard to the implementation of national policy set out in the NPPF.
- 2.14 The Government published an updated Historic Environment section of the NPPG in July 2019, to reflect the changes made to the NPPF earlier this year. A large number of other sections of the NPPG have also been updated, but this section focuses on the changes made in the Historic Environment section. The majority of the text is unaltered, and changes largely provide clarification rather than any material alteration to the original publication.
- 2.15 The government published an update of the section 'Design: process and tools' in October 2019, which has replaced the 'Design' section of the 2014 edition, and focusses on a more process based series of guidance paragraphs.
- 2.16 The revised paragraph structure and contents of the 2019 update is not consistent with the 2014 Guidance that was used to inform preparation of the 2017 ES (including Heritage Assessment and Heritage Statement), therefore, those paragraphs identified within the October 2016 as being relevant to townscape and visual amenity are no longer valid.

### **Draft London Plan**

- 2.17 The Examination of the draft London Plan was completed on 22 May 2019. Following completion of the Examination, the GLA prepared a 'consolidated' version of the draft London Plan in July 2019 to show the Mayor's suggested changes arising from that process. Draft Policy HC1 of the new London Plan relates to reconciling heritage conservation and growth. Draft Policy D2 relates to delivering good design, including the understanding of character and context of a development. D8 of the new London plan relates to the design and location of Tall buildings.
- 2.18 On 21 October 2019, the Panel Report and Recommendations was published and on 17 December 2019, the Mayor sent his Intend to Publish Local Plan to the Secretary of State and a statement setting out his reasons for not accepting all of the panel recommendations.
- 2.19 On 13 March 2020, the Secretary of State wrote to the Mayor setting out his consideration of the Mayor's Intend to Publish London Plan. The Secretary of State confirmed the exercise of their powers under section 337 of the Greater London Authority Act 1999 to direct the Mayor that they cannot publish the London Plan until they have incorporated changes required by those Directions. The Mayor responded to the Secretary of State on 24 April 2020, confirming that further work would be undertaken to resolve the amendments required by the Direction.

2.20 Accordingly, this emerging planning policy has not, at the time of preparing this report, been adopted and whilst a material consideration it cannot be given full weight at this stage.

#### **Historic England Guidance Documents**

##### ***Historic England, Historic Environment Good Practice Advice in Planning Note 3 (Second Edition): The Setting of Heritage Assets (2017)***

2.21 GPA Note 3 provides information to assist in implementing historic environment policy with regard to the managing change within the setting of heritage assets. This also provides a toolkit for assessing the implications of development proposals affecting setting. A series of stages are recommended for assessment, these are:

- Step 1: identifying the heritage assets affected and their settings
- Step 2: assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s)
- Step 3: assessing the effect of the proposed development
- Step 4: maximising enhancement and minimising harm
- Step 5: making and documenting the decision and monitoring outcomes.

2.22 This document has been used to inform the impact assessment contained in this Addendum. The preparation of the Heritage Statement (June 2017) and the Supplementary Comment: Impact of Proposed Development on Regent's Park (October 2017) complies with the requirements of this approach.

##### ***Historic England, Advice Note 1 (Second Edition) – Conservation Area Appraisal, Designation and Management (2019)***

2.23 Advice Note 1 sets out a series of conservation principles and guidance regarding the management of conservation areas. It outlines the fundamentals of designation, and, importantly, puts in place processes for character appraisals which may be used to manage development in the area moving forward. It sets an over-arching objective for character appraisals as documents, which understand and articulate why the area is special and what elements within the area contribute to this special quality and which don't. Having done this, it outlines an approach to assessments of special interest which uses desk and field-based inquiry. There are no material amendments to the first edition that would alter the assessment or conclusions in the preparation of the Heritage Statement (June 2017) and the Supplementary Comment: Impact of Proposed Development on Regent's Park (October 2017).

##### ***Draft Historic England, Historic Environment Good Practice Advice Note 4: Tall Buildings (second edition) (2019)***

2.24 Historic England has closed consultation on a revised version of their Good Practice Advice Note 4; however, the final version has not yet been published. On that basis, it carries limited weight at the time of preparing this Addendum.



**Camden Planning Guidance: Design (2019)**

2.25 This is an adopted supplementary planning document, which supports the policies of Camden’s Local Plan. It provides further guidance on topics within the borough, including design excellence and heritage.

2.26 With regard to Design Excellence, the guidance sets out the following key messages:

*“Camden is committed to excellence in design and schemes should consider:*

- *The context of a development and its surrounding area;*
- *The design of the building itself;*
- *The use and function of buildings;*
- *Using good quality sustainable materials;*
- *Creating well connected public spaces and good quality public realm*
- *Opportunities for promoting health and well-being*
- *Opportunities for improving the character and quality of an area”*

2.27 Key messages with regard to heritage matters include:

- *“Camden has a rich architectural heritage and we have a responsibility to preserve, and where possible, enhance these areas and buildings.*
- *The Council will only permit development within conservation areas that preserves and where possible enhances the character and appearance of the area.*
- *Our conservation area statements, appraisals and management plans contain further information and guidance on all the conservation areas.*
- *Most works to alter a listed building are likely to require listed building consent.*
- *The significance of ‘Non-Designated Heritage Assets’ (NDHAs) will be taken into account in decision-making.*
- *Historic buildings can and should address sustainability and accessibility.*
- *Heritage assets play an important role in the health and wellbeing of communities.”*

2.28 The selection of materials should be an integral part of the design process and should be:

*“contextual – the texture, colour, pattern and patina of materials can influence the impact and experience of buildings for users and the wider townscape. The quality of a well-designed building can easily be reduced by the use of poor quality or an*

*unsympathetic palette of materials. Decisions on the materials used in a development scheme should be informed by those used in the local area.”*

2.29 Good design should be contextual to the Site by:

- *“ensuring the scale of the proposal overall integrates well with the surrounding area*
- *carefully responding to the scale, massing and height of adjoining buildings, the general pattern of heights in the surrounding area*
- *positively integrating with and enhancing the character, history, archaeology and nature of existing buildings on the site and other buildings immediately adjacent and in the surrounding area, and any strategic or local views, vistas and landmarks. This is particularly important in conservation areas;*
- *respecting and sensitively responding to the natural and physical features, both on and off the site. Movement of earth to and from and the around the site should be minimized to prevent any negative impact.*
- *Natural features and site constraints to be considered when responding to context include, but are not limited to:*
  - *slope and topography*
  - *vegetation*
  - *biodiversity*
  - *habitats*
  - *waterways and drainage*
  - *wind, sunlight and shade, and*
  - *local pollutant sources*
  - *flood risk*
  - *slope instability*
- *consider and achieve good connectivity to, from, around and through the site for people using all modes of transport, including pedestrians, cyclists, wheelchair users, those with visual impairments, people with pushchairs, and motorised vehicles.”*

2.30 The guidance considers the specific requirements of the citing of tall buildings.

*“Camden does not allocate areas for tall buildings because of the borough’s diverse and rich historical and architectural context. Tall buildings in Camden (i.e. those which are*

*substantially taller than their neighbours and/or which significantly change the skyline) will be assessed against a range of design issues, including:*

- *how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape, and how the top of a tall building affects the skyline;*
- *the contribution a building makes to pedestrian permeability and improved public accessibility;*
- *the relationship between the building and hills and views;*
- *the degree to which the building overshadows public spaces, especially open spaces and watercourses; and*
- *the historic context of the building's surroundings."*

**2.31** The general form, overall height and position of the July 2020 amended proposed development remains unchanged from the extant planning consent. The points of divergence from the extant planning consent, as set out within the Design and Access Statement Addendum would have limited effect on the appearance of the development when considered against the principles of the Design Guidance.

### 3. Review of Built Heritage Baseline

- 3.1 A review of the National Heritage List for England, and the Council’s website, confirms that no additional built heritage assets have been identified within the study area<sup>7</sup>, since the Heritage Statement (June 2017) and the Supplementary Comment: Impact of Proposed Development on Regent’s Park (October 2017). Accordingly, for the purposes of this Addendum, having regard to the nature of the July 2020 amended proposed development, the built heritage assets summarised in Tables 3.1 – 3.5 require assessment<sup>8</sup>.
- 3.2 For the purposes of this assessment, the particular heritage significance of designated and non-designated street furniture i.e. lamp posts; telephone boxes; post boxes; and, bollards within the study area, means that they would not be affected by the July 2020 amended proposed development as an element of their setting (Nos.11, 12 and 27 in Table 3.1; and, Nos.2, 9, 16 and 26 in Table 3.5). Accordingly, they are not considered as part of this report.
- 3.3 There are a number of heritage assets (Nos. 13-17 in Table 3.2) identified within 1km of the application site that fall within the Grade I Registered Park and Garden of Special Historic interest of Regent’s Park (see below). Given the nature and extent of the July 2020 amended proposed development, and the particular significance of the heritage assets, it is the role of these structures within the wider historic, designated landscape of Regent’s Park that is assessed as part of this report.

**Table 3.1: All Statutorily Listed Buildings within 500m of Application Site**

Number	Name	Grade
1	Horse Hospital with ramps and boundary wall at north of site II*	
2	Stanley Sidings, Stables to east of Bonded Warehouse	II
3	Hampstead Road Bridge over Grand Union Canal	II
4	Regent’s Canal Information Centre	II
5	Hampstead Road Lock on the Grand Union Canal	II
6	Roving Bridge over Grand Union Canal west of Hampstead Road Lock	II
7	The Interchange Canal Towpath Bridge over Private Canal	II

<sup>7</sup> The ‘Heritage Study Area’ comprises:

- All heritage assets (listed buildings, conservation areas, registered parks and gardens, locally listed buildings and other non-designated heritage assets) within 500m of the Site; and
- All grade I and II\* heritage assets within 1km of the Site.

<sup>8</sup> The heritage assets marked in grey within Tables 3.1 to 3.5 were excluded from further assessment in the Heritage Statement (June 2017).

Number	Name	Grade
	Entrance	
8	The Interchange on north side of Grand Union Canal including the Horse Tunnel and Stairs, Vaults and Canal Basin	II
9	Camden Incline Winding Engine House	II*
10	The Roundhouse	II*
11	Drinking Fountain set in wall next to The Roundhouse	II
12	Cattle Trough opposite debouchment of Belmont Street, south east of The Roundhouse	II
13	Chalk Farm Underground Station	II
14	Kent House	II
15	Church of the Holy Trinity with St Barnabas	II
16	No.1, Hawley Road	II
17	Nos.57-63 Kentish Town Road and attached Garden Railings, Wall, Pillar and Gate	II
18	No.55, Kentish Town Road	II
19	The Elephant House including Former Coopers' Building, Boundary Walls and Gatepiers	II
20	Arlington House (Former Camden Town Rowton House)	II
21	Nos.38-46, Jamestown Road and Nos.24, 26 and No.28 Oval Road	II
22	Piano Factory Building	II
23	Nos.36 to 41, Gloucester Crescent	II
24	Nos.30 to 35, Gloucester Crescent	II
25	Nos.24 to 29, Gloucester Crescent	II
26	Nos.40, 42 and 44 Inverness Street and attached railings	II
27	Two lamp posts opposite Nos.43 and 40	II
28	Nos.37 to 43 Inverness Street and attached railings	II

Number	Name	Grade
29	No.23, Gloucester Crescent	II
30	Nos.3 to 22, Gloucester Crescent	II
31	Nos.1 and 2, Gloucester Crescent	II
32	Nos.52-59, Gloucester Crescent	II
33	Nos.60 and 61, Gloucester Crescent	II
34	Nos.62 and 63, Gloucester Crescent	II
35	Nos.64 and 65, Gloucester Crescent	II
36	Nos.66 and 67, Gloucester Crescent	II
37	Nos.68, 69 and 70, Gloucester Crescent	II
38	Nos. 2-10 Oval Road and attached railings	II
39	Nos.1-22 Regent's Park Terrace and attached railings	II
40	Nos.15 to 31, Gloucester Avenue	II
41	Nos.1-15, Prince Albert Road	II
42	Cecil Sharp House	II
43	No.10, Regent's Park Road	II
44	Grafton Bridge over the Grand Union Canal	II
45	Vernon House	II
46	Church of St Mark	II
47	Nos.2 and 3, St Mark's Square	II
48	No.4, St Mark's Square and No.36, Regent's Park Road	II
49	Primrose Hill Infants School	II
50	Playground walls, railings and gates to Primrose Hill Infants School	II
51	The Engineer Public House and attached wall	II
52	Primrose Hill Studios	II

Number	Name	Grade
53	Nos.24-46 Chalcot Crescent and attached railings	II
54	Nos.1-11 Chalcot Square and attached railings	II
55	Nos.12, 13 and 14 Chalcot Square and attached railings	II
56	Nos.15-19 Chalcot Square and attached railings	II
57	Nos.20-28 Chalcot Square and attached railings	II
58	Nos.29-33 and 33A Chalcot Square and attached railings	II

**Table 3.2: Grade I and II\* Statutorily Listed Buildings within 1km of Application Site**

Number	Name	Grade
1	Primrose Hill Tunnels (Eastern Portals)	II*
2	Church of St Silas the Martyr	II*
3	Church of St Michael	II*
4	All Saints Greek Orthodox Church	I
5	Nos.2-16, 22-34, 36A and 36B Regent's Park East and attached railings	II*
6	Nos.1-8, 10-14 and 17-19 Regent's Park West and attached railings	II*
7	No.15 Gloucester Gate and attached boundary walls and piers	II*
8	Gloucester Lodge (No.12) Gloucester House (No.14) and attached boundary wall	I
9	Numbers 2 to 11 Gloucester Gate and attached railings	I
10	Number 1-3 and 6-9 St Katherines Precinct and attached railings	II*
11	The Danish Church	II*
12	Nos.4 (The Pastors House) and 5 (St Katherines Hall) and attached screen walls	II*

13	Cumberland Footbridge over Grand Union Canal to Outer Circle, Regent's Park	II*
14	Chimps Breeding Colony The Gorilla House	I
15	Snowdon Aviary London Zoo	II*
16	Elephant and Rhinoceros Pavilion London Zoo	II*
17	Penguin Pool	I

**Table 3.3: Registered Park and Garden of Special Historic Interest within 1km of Application Site**

Name	Grade
Regent's Park	I

**Table 3.4: Conservation Areas within 500m of Application Site**

Number	Name	Date of Designation	Number
1	Regent's Canal Conservation Area	25 April 1974	1
2	Primrose Hill Conservation Area	1 October 1971	2
3	Harmood Street Conservation Area	20 September 2005	3
4	Camden Town Conservation Area	11 November 1986	4

**Table 3.5: Locally Listed Buildings/Non-Designated Heritage Assets within 500m of Application Site**

Number	Name
1	Nos.2-8 (even) Ferdinand Street
2	Granite setted carriageway – Ferdinand Place
3	Nos.36-37 Chalk Farm Road
4	No.1a Harmood Street
5	Nos.1-55 Hartland Road (odd-west side)
6	Holy Trinity and St Silas Primary School, Hartland Road



Number	Name
7	Nos.39-49 (odd) and Nos.54-76 (even) Hadley Street and Nos.14 & 16 Lewis Street and street surfacing
8	Post Box – Corner of Hartland Road and Lewis Street
9	Tapping the Admiral PH, No.77 Castle Road
10	No.41 Clarence Way (corner Castlehaven Road)
11	Hawley Infant School, Buck Street
12	The Buck's Head PH, No.202 Camden High Street
13	The Elephant's Head PH, No.224 Camden High Street
14	The Oxford Arms PH, No.265 Camden High Street
15	No.31 Jamestown Road
16	Lamp Posts – Arlington Road (various locations)
17	No.57 A/B/C/D Jamestown Road
18	Nos.61-85 Jamestown Road
19	Nos.14-18 Oval Road
20	No.12 Oval Road
21	Nos.2, 10 & 11 Regal Lane
22	Nos.1 & 2 Bridge Approach
23	Nos.23-49 Adelaide Road
24	No.2 Haverstock Hill and Nos.45-47 Crogsland Road
25	Nos.1-11 Crogsland Road
26	Post Box – Outside No.77 Chalk Farm Road
27	Nos.4-8 (even) and Nos.7-11 (odd) Belmont Street
28	Former Chappell's Piano Factory, No.10a Belmont Street
29	Nos.10-14 (even) Belmont Street

## 4. Impact Assessment of July 2020 amended proposed development

### Introduction

4.1 The relevant built heritage policy and guidance context for consideration of the July 2020 amended proposed development is set out in full in Appendix 6 of the Heritage Statement (June 2017) and the Supplementary Comment: Impact of Proposed Development on Regent's Park (October 2017), as amended by Section 2 of this report. This includes:

- the statutory duties of the Planning (Listed Buildings & Conservation Areas) Act 1990 including the requirement to have special regard to the desirability of preserving the special interest of a listed building and any elements of setting, which contributes positively to this special interest and to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Importantly, however, the setting of a conservation area is not enshrined in the legislation and does not attract the weight of statutory protection<sup>9</sup>;
- national policy set out in the NPPF; and
- local policy for the historic environment and other relevant material considerations.

4.2 In accordance with the requirements of the NPPF, the significance of the identified heritage assets, including the contribution made by setting to that significance, has been described Heritage Statement (June 2017) and the Supplementary Comment: Impact of Proposed Development on Regent's Park (October 2017). The Council also summarised their understanding of the particular significance of the relevant heritage assets in the committee report for the June 2018 consented scheme.

4.3 Great weight and importance should be placed on; the desirability of sustaining and enhancing the significance of heritage assets and putting them to 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.

4.4 The NPPF also highlights that when considering the impact of proposals on the significance of designated heritage assets, great weight should be given to their conservation, and the more important the asset the greater the weight should be.

### Context to Impact Assessment

4.5 As a result of its height and massing, the July 2020 amended proposed development would be widely visible, and so would change/be a new element within the Regent's

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<sup>9</sup> APP/H1705/A/14/2219070

Canal Conservation Area and in the settings of a number of heritage assets (see Section 3 of this Addendum).

- 4.6 In considering the heritage impacts arising from the June 2018 consented scheme, the Council's committee report stated at paragraph 19.51:

*"Heritage Assets: Less than substantial harm would result to The Grade-I listed Regent's Park, the Grade-II\* listed Horse Hospital, the Grade-II\* listed Roundhouse, the Parkhill Conservation Area and the Primrose Hill Conservation Area. This harm is to be accorded considerable weight and importance under s.66 and s.72 and under para 134 of the NPPF is to be weighed against the public benefits of the proposal. The heritage assessment (chapter 6) identifies that in general, the harm can be clearly associated with the proposed accommodation of building heights and densities on the site which result from an aim to optimise development, and which are instrumental to providing the scheme's public benefits."*

- 4.7 The overall planning balance was articulated at paragraph 19.57 of that report, which states:

*"The overall assessment demonstrates that the development would lead to some harm, mainly to heritage assets (which is to be accorded considerable importance and weight) and to local amenity. However, the harm is outweighed by the public benefits of the development, which responds to the many challenges and constraints of the site with a new urban neighbourhood which would provide a high quality environment for all those who live, work and visit the place."*

## **Heritage Impact Assessment**

### **Statutorily Listed Buildings**

#### ***Horse Hospital with ramps and boundary wall at north of site (Grade II\*)***

- 4.8 The listed building and July 2020 amended proposed development would be experienced in conjunction with each other from outside of the market, as part of a varied urban townscape context, primarily as part of the kinetic experience of moving along Chalk Farm Road (Views 28-31) and in linear views along Harmood Street (View 24), Hartland Road (View 25) and Ferdinand Street (View 23). Whilst the increased heights of Blocks A, B, C and F would be understood as part of these kinetic experiences along Chalk Farm Road, the new buildings would be seen behind and against the context of the more recent market buildings, which are taller and of a contrasting contemporary character to the listed building, in a manner consistent with the May 2020 consented scheme. In those terms, the July 2020 amended proposed development would be consistent with these elements of the listed building's townscape setting.
- 4.9 When experienced at street level, within the Camden Market complex, the July 2020 amended proposed development would have a variable effect on the significance of the heritage asset, due to the scale of interposing, recent market buildings and the railway viaduct, and the associated sense of enclosure. Where visible from within the markets, particularly from the first floor ramp level, the July 2020 amended proposed development would be seen in the context and beyond these more modern market

buildings, where there is a transition between the historic character of the markets and the application site, defined by the enclosing brick boundary wall.

- 4.10 As identified in the Design and Access Statement Addendum, the July 2020 amended proposed development is of a high-architectural quality that responds to both its particular history and the varied character of the wider context in which it is located; it is not materially different to the consented architectural design, materiality and character of the May 2020 consented scheme. The disposition of new development within the MS Parcel and the variety in forms, heights and massing results in layered and complex relationships in the setting of the listed building and avoids overbearing and unrelieved masses. Moreover, such relationships from outside of the market complex are consistent with its historic distinction from the surrounding context. The robust and substantial retaining wall to the Chalk Farm Road, historically, marked the interface and boundary between the railways related infrastructure and the varied domestic/commercial townscape to the north, where there are existing contrasts in scale, character and patterns of activity.
- 4.11 Consistent with the May 2020 consented scheme, the July 2020 amended proposed development, there would be no impact on the internal qualities, fabric, features or experience of the stables that makes an important contribution to the particular special interest of the listed building.
- 4.12 In those terms, the nature and extent of the July 2020 proposed amendments would not materially change the previously established impacts of the May 2020 consented scheme on the significance of this listed building. Accordingly, the July 2020 amended proposed development would preserve the special interest and setting of this listed building.

***Stanley Sidings, Stables to east of Bonded Warehouse (Grade II)***

- 4.13 When experienced at street level within the market, the July 2020 amended proposed development would form part of the varied and complex experience defined by the scale of interposing, recent market buildings and the railway viaduct, and the associated sense of enclosure. Where visible from within the markets, particularly at upper levels, the July 2020 amended proposed development would be experienced and understood in the context and beyond these more modern market buildings, where there is a transition between the historic character of the markets and the application site, defined by the enclosing brick boundary wall.
- 4.14 The listed buildings and the July 2020 amended proposed development would also be experienced in conjunction with each other from outside of the market, albeit as part of a varied urban context, primarily as part of the kinetic experience of moving along Chalk Farm Road (Views 28-31) and in linear views along Harwood Street (View 24) and Ferdinand Street (View 23). Whilst the increased heights of Blocks A, B, C and F would be understood as part of these kinetic experiences, the new buildings would be seen behind and against the context of the more recent market buildings, which are taller and of a contrasting contemporary character to the listed building, in a manner consistent with the May 2020 consented scheme. In those terms the July 2020 amended proposed development would be consistent with the assets' varied townscape context.

- 4.15 As identified in the Design and Access Statement Addendum, July 2020 amended proposed development is of a high-architectural quality that responds to both its particular history and the varied character of the wider context in which it is located; it is not materially different to the consented architectural design, materiality and character of the May 2020 consented scheme. The disposition of new built form within the MS Parcel and the variety in forms, heights and massing results in layered and complex relationships in the setting of the listed buildings and avoids overbearing and unrelieved masses. Moreover, such relationships from outside of the market complex are consistent with its historic distinction from the surrounding context. The robust and substantial retaining wall to the Chalk Farm Road, historically, marked the interface and boundary between the railways related infrastructure and the varied domestic/commercial townscape to the north, where there are existing contrasts in scale, character and patterns of activity.
- 4.16 In those terms, the nature and extent of the July 2020 proposed amendments would not materially change the previously established impacts of the May 2020 consented scheme on the significance of this listed building. Accordingly, the July 2020 amended proposed development would, in overall terms, preserve the special interest and setting of this listed building.

***Hampstead Road Bridge over Grand Union Canal (Grade II) / Regent's Canal Information Centre (Grade II) / Hampstead Road Lock on the Grand Union Canal (Grade II) / Roving Bridge over Grand Union Canal west of Hampstead Road Lock (Grade II) / The Interchange Canal Towpath Bridge over Private Canal Entrance (Grade II) / The Interchange on north side of Grand Union Canal including the Horse Tunnel and Stairs, Vaults and Canal Basin (Grade II)***

- 4.17 These assets form part of a spatially complex and rich spatial experience that allows an understanding of the historic legacy of the functional interrelationships between the canal, railway and road networks associated with Camden Goods Yard, located to the northwest.
- 4.18 The July 2020 amended proposed development is a minor element in the experience of these heritage assets, particularly from along the canal, where the important historic interrelationships are best understood. In that context, the nature of existing built form and within the adjoining market means that the July 2020 amended proposed development would be a minor new element with some intervisibility with the heritage assets from the canal.
- 4.19 The proposed increase in height of Block C, as part of the July 2020 proposed amendments, would have a minor impact on the legibility of the architectural character and quality of the Interchange Building by distracting, in a small way, from an appreciation of its landmark qualities and distinctive silhouette by virtue of its increased visibility relative to the tower and rising above the strong horizontal parapet (Views 32-34 and A9). Being a substantial industrial building, however, located in a prominent position relative to the canal context, the listed building remains prominent and dominant as part of the listed building group and that group value and relationship to important elements of setting remain unchanged. The July 2020 amended proposed development would, in those terms, cause some less than substantial harm to the significance of the Interchange Building. That level of less than substantial harm would

be greater, in relative terms than assessed for the May 2020 consented scheme, however, in overall terms, it remains a comparatively low level

- 4.20 For the other heritage assets within this group, where the July 2020 amended proposed development is a new part of the experience of their group value, it would be a minor element, visible in part of the townscape context where the contemporary market buildings form part of the existing backdrop. In those terms, it does not impair an understanding of the particular significance of those listed buildings and their strong group value.
- 4.21 The development of the MS Parcel would, in addition, have an impact on the Interchange Building and its setting, where it interfaces at Gilbeys Yard. This area has, historically, been extensively altered with the erection of the existing residential development, the artificial separation from the MS Parcel; the extensive areas of car parking and servicing areas; satellite dishes; and, back of house areas associated with the current operation of the Interchange Building. This is not an area where it is best possible to appreciate the significance of the listed building, albeit it does assist in the understanding of its role at the historic interface between rail, road and canal (albeit that these functional connections have ceased). These remaining elements, which provide some continuity of the former functional links between the MS parcel and this immediate context, includes the cobbles/setts, rail tracks, ventilation grilles and the subterranean horse tunnels (although public access is currently not possible), all of which would be retained by the July 2020 amended proposed development.
- 4.22 The development of the MS Parcel would reinstate, where possible, connections to this part of the wider townscape context, utilising a language and palette of materials that resonates with the former function of the Camden Goods Yard and those remaining elements beyond the application site boundary, including the Interchange Building, public realm and horse tunnels. The July 2020 amended proposed development would replace the existing extensive surface car parking and non-descript food store building, which are incongruous elements of the listed building's setting, with a high-quality, integrated neighbourhood that has been developed from an understanding of the application site's historic uses and current townscape context. The proposed layout of the MS Parcel would provide attractive new public landscaped areas from which to appreciate the distinctive silhouette of the Interchange's long, low form and vertical landmark tower. The revised landscaping proposals maintain the design ethos, character and materiality of the May 2020 consented scheme.
- 4.23 It is understood that there would be no construction activities associated with the July 2020 amended proposed development from Gilbeys Yard, so there would be no impact on positive elements of setting cobbles/setts, rail tracks, ventilation grilles and the subterranean horse tunnels
- 4.24 In overall terms, the July 2020 amended proposed development would preserve the special interest of the majority of this group of listed buildings, consistent with the assessment of the impacts of the May 2020 consented scheme.
- 4.25 In the case of the Interchange Building, there would be an overall enhancement to its setting, which would deliver an improvement to an understanding of its special architectural and historic interest. There would, however, be instances as part of the

kinetic experience where elements of the July 2020 amended proposed development would be seen behind and beyond the listed building as part of the complex kinetic experience of the canal, which would result in some instances of localised adverse impact. The increased height of Block C would increase the level of less than substantial harm from that assessed from the May 2020 consented scheme, however, in overall terms, the level of less than substantial harm would remain comparatively minor.

***Camden Incline Winding Engine House (Grade II\*)***

4.26 In light of the particular significance of this listed building, and its subterranean siting, the minor nature and extent of the July 2020 proposed amendments would not materially change the previously established impacts of the May 2020 consented scheme. Accordingly, the July 2020 amended proposed development would preserve the special interest and setting of this listed building.

***The Roundhouse (Grade II\*)***

4.27 The July 2020 amended proposed development would have localised impacts arising, principally, from the taller elements of Blocks A and B being visible as new elements of its varied urban context and backdrop, particularly when viewed from the north along Haverstock Hill and Chalk Farm Rd (Views 4, 5 and 21). These elements of the July 2020 amended proposed development would have no impact on an understanding of the building's internal form and appearance, which provide the strongest indication of its varied historic uses as the basis of its special interest. These elements of the July 2020 amended proposed development would, however, in certain views, as part of a bustling urban context and kinetic experience, be seen against the listed building's silhouette. Whilst such relationships between buildings are not uncommon in dense urban contexts, and the separation distances and contrasting forms would maintain clear legibility and distinction between the listed building, the visibility of Blocks A and B of the July 2020 amended proposed development would cause a minor degree of harm due to the minor erosion of the ability to perceive the building's form and silhouette against the skyline.

4.28 In overall terms, the increase in height of Blocks A and B would increase the relative prominence of new built form within the application site relative to the listed building to a minor degree, thereby amplifying the previously identified erosion of the legibility of the Roundhouses' distinctive roof form caused by the May 2020 consented scheme. In those terms, whilst the level of the visual impact of the July 2020 amended proposed development on the significance of the Roundhouse would increase to a minor extent; the most important elements of its particular heritage significance, i.e. the internal spatial qualities and fabric remain unaffected.

4.29 Accordingly, in overall terms, having regard to those adverse impacts, when considered against the public benefits of delivering new public vantage points to the Roundhouse from within the application site, the July 2020 amended proposed development would cause a comparatively minor degree of less than substantial harm to the special interest of the listed building.

***Chalk Farm Underground Station (Grade II)***

4.30 In light of the particular significance of this listed building, as a distinctive example of Leslie Green's high-quality Edwardian Baroque 'house style' station design for the Charing Cross, Euston & Hampstead Railway (CCE&HR) and the City & South London Railway (C&SLR), and the particular contribution made by its varied and bustling urban townscape setting to that significance, the minor nature and extent of the July 2020 proposed amendments would not materially change the previously established impacts of the May 2020 consented scheme. Accordingly, the July 2020 amended proposed development would preserve the special interest and setting of this listed building as a high-quality Edwardian tube station.

***Kent House (Grade II)***

4.31 In light of the particular significance of this listed building as an early, high-quality example of low-cost model flats designed by Connell, Ward and Lucas in the International Modern style, located within a variable and fragmented urban context, the minor nature and extent of the July 2020 proposed amendments would not materially change the previously established impacts of the May 2020 consented scheme. Accordingly, the July 2020 amended proposed development would preserve the special interest and setting of this listed building.

***Church of the Holy Trinity with St Barnabas (Grade II)***

4.32 The listed building is a good example of 19<sup>th</sup> century ecclesiastical Gothic architecture that illustrates the revival in the interest of Anglican worship and the provision of social amenities within the rapidly expanding urban areas of London. Its context is now heavily altered and fragmented, with only limited areas of contemporaneous Victorian townscape remaining set within a fragmented 20<sup>th</sup> urban area. The July 2020 amended proposed development would be visible in the context of the church, across Castle Haven Open Space and the railway viaduct (View 26). In light of the particular significance of this listed building, separation distances, interposing built form and disposition relative to the application site, the minor nature and extent of the July 2020 proposed amendments would not materially change the previously established impacts of the May 2020 consented scheme. Accordingly, the July 2020 amended proposed development would preserve the special interest of this listed building as a grand 19<sup>th</sup> century urban church, and its setting.

***No.1, Hawley Road (Grade II), Nos. 57-63 and attached Garden Railings, Wall, Pillar and Gate (Grade II) / No.55, Kentish Town Road (Grade II)***

4.33 These listed buildings form a cohesive group of mid-19<sup>th</sup> century villas of classical design that illustrate the rapid urban growth of the area. Their townscape setting is varied and it is the remaining elements of the area's 19<sup>th</sup> century expansion that principally contributes positively to their heritage significance. In light of the particular significance of these listed buildings, separation distances, interposing built form and tight urban grain, the minor nature and extent of the July 2020 proposed amendments would not materially change the previously established impacts of the May 2020 consented scheme. Accordingly, the July 2020 amended proposed development would preserve the special interest and settings of these listed buildings.



***The Elephant House including Former Coopers' Building, Boundary Walls and Gatepiers (Grade II)***

4.34 This is an imposing early 20<sup>th</sup> century industrial complex, which illustrates the importance of industry for the development and historic character of this part of Camden. Its setting is now varied, including a range of substantial contemporary buildings and the remaining industrial structures and Grand Union Canal. Having regard to the particular significance of these listed buildings, interposing built form incorporating emerging context of Hawley Wharf, separation distances and tight urban grain; the minor nature and extent of the July 2020 proposed amendments would not materially change the previously established impacts of the May 2020 consented scheme. Accordingly, the July 2020 amended proposed development would preserve the special interest and settings of these listed buildings.

***Arlington House (Former Camden Town Rowton House) (Grade II)***

4.35 This is an early and important example of a Rowton House, which, historically, provided affordable accommodation for the urban working class, which remains in use today as affordable housing. It is a grand and imposing composition of a strongly contrasting character to that of the surrounding, varied and predominantly later 20<sup>th</sup> century immediate townscape context. Having regard to the minor nature and extent of the July 2020 proposed amendments, the disposition of the July 2020 amended proposed development, nature of the tight urban grain and presence of interposing built form there would be no material change to the previously established impacts of the May 2020 consented scheme on the significance of this listed building. Accordingly, the July 2020 amended proposed development would preserve the special interest and settings of this listed building, including the legibility of the principal street frontage and silhouette would be maintained as would the site layout and plan form that illustrates the original concerns with providing access to natural light and ventilation (View A5).

***Nos.38-46, Jamestown Road and Nos.24, 26 and 28 Oval Road (Grade II)***

4.36 This listed building is a late 19<sup>th</sup> century, former factory, store and office building, which is an early example of reinforced concrete construction. It also derives historic interest from its associations with the local firm of Gilbey's; wine importers and gin distillers, and their subsequent growth. The 1937 Mendelsohn and Chermayeff addition incorporates a number of technical innovations, which amplify its architectural interest. The setting of the listed building comprises the adjacent mid-18<sup>th</sup> century terraced properties and late 19<sup>th</sup> century public house on Jamestown Road, which contribute positively to the heritage asset as part of its historic context. The adjacent Regent's Canal also makes a positive contribution as it provides a link to the building's relationship with the former Camden Goods Depot.

4.37 The July 2020 amended proposed development would introduce a significant quantum of new built form in the varied urban context of the listed building; however, it would be separated by interposing built form and the Grand Union Canal and experienced above/beyond modern the context of Gilbeys Yard; there would be no impact on the important reciprocal relationships to the canal and industrial context. Having regard to the nature and extent of the July 2020 proposed amendments, specifically the proposed increase in the height of Blocks A, B, C and F, the scale, mass and character of the July 2020 amended proposed development would have no impact on an ability to understand the special interest of this robust industrial building and is consistent with

the existing and emerging townscape context, with the established contrasts in form and mass (Views 35-37), which would, therefore, be preserved.

***Piano Factory Building (Grade II)***

4.38 The piano factory building is a distinctive 19<sup>th</sup> century industrial building, whose form is associated with the particular requirements derived from the manufacture of pianos, a locally distinctive industry of the period. Its setting is varied, reflecting the listed building's location at the gradual transition between the consistent, grand domestic character of Gloucester Crescent and southern parts of Oval Road, with the more varied character of the northern part of Oval Road and the Grand Union Canal. It is tightly enclosed by surrounding built form, which limits intervisibility with the application site. The July 2020 amended proposed development would introduce new, high-quality buildings of a commensurate scale and character with the varied townscape context, as it increases in scale and density towards the canal. Having regard to the minor nature and extent of the July 2020 proposed amendments, specifically the proposed increase in the height of Blocks A, B, C and F, the scale, mass and character of the July 2020 amended proposed development would have no impact on an ability to understand the special interest of this industrial building, notably an appreciation of its circular form as a tangible legacy to its original function, which would, therefore, be preserved (Views 36 and 37).

***Nos.36 to 41, Gloucester Crescent (Grade II)/ Nos.30 to 35, Gloucester Crescent (Grade II) / Nos.24 to 29, Gloucester Crescent (Grade II) / Nos. 40, 42 and 44 and attached railings (Grade II) / Nos.37 to 43 and attached railings (Grade II) / Nos.23, Gloucester Crescent (Grade II) / Nos.3 to 22, Gloucester Crescent / (Grade II) / Nos.1 and 2, Gloucester Crescent (Grade II) / Nos.52-59, Gloucester Crescent (Grade II) / Nos.60 and 61, Gloucester Crescent (Grade II) / Nos.62 and 63, Gloucester Crescent (Grade II) / Nos.64 and 65, Gloucester Crescent (Grade II)/ Nos.66 and 67, Gloucester Crescent (Grade II) / Nos.68, 69 and 70, Gloucester Crescent (Grade II) / Nos 2 -10 Oval Road (Grade II) / Nos 1 – 22 Regent's Park Terrace (Grade II)***

4.39 These listed buildings form part of a grand, planned 19<sup>th</sup> century urban layout, comprising tall and imposing classically designed terraced and semi-detached houses as part of a traditional townscape. Notwithstanding the minor nature and extent of the July 2020 proposed amendments, specifically the proposed increase in the height of the proposed increase in the heights of Blocks A, B, C and F, the July 2020 amended proposed development would have a limited impact on the significance of these listed buildings, being limited to a presence in views northwards along Oval Road, beyond the existing built form of Gilbeys Yard (Views 35 and 36). This new built form would form part of the varied built context to the north of the listed buildings that tends to increase in scale and mass towards the Grand Union Canal. This part of the assets' setting already includes contrasts in scale, character and materiality and the presence of new, high-quality urban development within this part of its setting. In those overall terms, there would be no material changes to the previously established impacts of the May 2020 consented scheme. Accordingly, the July 2020 amended proposed development would have no impact upon an understanding of the particular architectural or historic interest or setting of these listed buildings as a group of grand, planned 19<sup>th</sup> century residential development, which would, therefore, be preserved.

***Nos.15 to 31, Gloucester Avenue (Grade II)***

4.40 The heritage asset is of special interest as a mid-19<sup>th</sup>, Classically-influenced terrace of stock brick townhouses, which are illustrative of the development of the area in the 19<sup>th</sup> century, following the construction of the Regent's Canal in 1820. The symmetrical composition, architectural detailing and the largely unaltered appearance of the terrace also contributes to its significance. The surrounding context is predominantly residential and incorporates a number of street trees and vegetation, which contribute positively to the listed building. The July 2020 amended proposed development is located to the north-west of the listed buildings. Notwithstanding the minor nature and extent of the July 2020 proposed amendments, specifically the proposed increase in the height of the proposed increase in the heights of Blocks A, B, C and F, the July 2020 amended proposed development would, due to its relative disposition, orientation of the listed building and nature of interposing townscape/landscape, have no impact on the legibility of their special architectural character and relationship to remaining elements of contemporaneous townscape (Views 15 and 16). Accordingly, there would be no material change to the previously established impacts of the May 2020 consented scheme and the July 2020 amended proposed development would preserve the special interest and settings of these listed buildings.

***Nos.1-15, Prince Albert Road (Grade II)***

4.41 These are a group of mid-19<sup>th</sup> century villas of varied Italianate and classical styles arranged in a picturesque form with a strong relationship to the designed landscape of Regent's Park to the south. Their setting is varied and includes Regent's Park with which they have a reciprocal relationship, the later 19<sup>th</sup> century townscape to the north and later 20<sup>th</sup> century redevelopments.

4.42 Given the nature of the existing townscape to the north of the listed buildings, seen in views between the villas, it is unlikely that the July 2020 amended proposed development would be visible as part of the townscape experience on Prince Albert Road. The upper elements of the July 2020 amended proposed development are, however, experienced as new background elements in the listed buildings' urban context from within parts of Regent's Park. The increased height of Block A, primarily, and to a lesser extent parts of Block F, would increase the visibility of the upper storeys of these buildings through existing soft landscaping (with seasonally defined effects) and in the context of glimpse views of these grade II listed villas (Views 10 and 11) when compared to the May 2020 consented scheme.

4.43 Having regard to the nature of glimpsed views of the listed buildings from this part of their setting, separation distances and the limited visibility of the July 2020 amended proposed development, there would be localised and comparatively minor adverse impacts on the significance of the listed buildings. Whilst there would be a marginal increase in the visibility of the July 2020 amended proposed development when compared to the May 2020 consented scheme, there would be no overall change to the previously identified effects, such that the level of heritage harm would be comparatively modest and less than substantial for the purposes of the NPPF.

***Cecil Sharp House (Grade II)***

4.44 This is an early 20<sup>th</sup> century, high-quality Neo-Georgian building designed for the English Folk Dance and Song Society. Its principal elements of heritage significance are

derived from its associations with Cecil Sharp, the leader of the modern English folk-music revival, and associated collections. The continued use of the building by the English Folk Dance and Song Society also contributes to its significance. The application site is located to the north-east of the listed building and due to this disposition and orientation of the building within its plot and surrounding street pattern; the July 2020 amended proposed development would introduce minor elements in the background, which do not impair the legibility of the listed building on its corner plot or an appreciation of its historic interest. Accordingly, there would be no material change to the previously established impacts of the May 2020 consented scheme and the July 2020 amended proposed development would preserve the special interest and setting of the listed building.

***No.10, Regent's Park Road (Grade II)***

4.45 This is a well-considered, mid-20<sup>th</sup> century Modernist building, constructed to fill a narrow gap site resulting from bomb damage, by the leading architect Erno Goldfinger. The considered approach towards its construction, carefully composed façade of contrasting materials, bold design elements and interior features also contribute to architectural interest. The nature of separation distances, disposition of the application site relative to the listed building, and degree of enclosure to the street, means that the July 2020 amended proposed development would have no impact on its particular heritage significance, including the contextual street elevation or internal planning, notwithstanding the proposed increase in height of Blocks A, B, C and F. Accordingly, there would be no material change to the previously established impacts of the May 2020 consented scheme. The July 2020 amended proposed development would, therefore, preserve the special interest and setting of the listed building.

***Grafton Bridge over the Grand Union Canal (Grade II)***

4.46 The early 19<sup>th</sup> century road bridge is an attractive example of engineering associated with the residential development of the area and provides complex spatial experiences from above the canal and when moving along the footpath. The July 2020 amended proposed development would form part of the experience of the asset, primarily as experienced from street level. There would be a significant quantum of new built form in the distant townscape context of this listed building; however, due to separation distances it would not impair an understanding of its special interest or relationship to the positive element of contemporaneous 19<sup>th</sup> century context of which it forms a part (View 13). Accordingly, there would be no material change to the previously established impacts of the May 2020 consented scheme. The July 2020 amended proposed development would, therefore, preserve the special interest and setting of the listed building.

***Vernon House (Grade II)***

4.47 This is an attractive, albeit typical mid-19<sup>th</sup> century classical terraced composition, which characterises the local townscape, situated on a prominent corner located at the crossroads of St Mark's Square with Princess Road, opposite to the grade II listed St Mark's Church and mid-19<sup>th</sup> century stucco villas. The July 2020 amended proposed development would introduce a significant quantum of new built form in the distant townscape context of the listed building. The nature of separation distances, street pattern, disposition of the application site relative to the listed building and interposing built form means that there would be no impact on the appreciation of the

architectural character of the listed building as a high-quality 19<sup>th</sup> century terrace. Whilst the additional height of Blocks A, B, C and F of the July 2020 amended proposed development would result in a minor relative increase in the visibility of new built form in the setting of this listed building, when compared to the May 2020 consented scheme, the disposition of individual buildings and variety in design would ensure that there is sufficient legibility of each component that it creates a layered composition. The July 2020 amended proposed development would, therefore, not impair the understanding of the group value derived from its wider 19<sup>th</sup> century context. Accordingly, in those terms, there would be no material change to the previously established impacts of the May 2020 consented scheme. The July 2020 amended proposed development would, therefore, preserve the special interest and setting of the listed building.

***Church of St Mark (Grade II)***

4.48 The July 2020 amended proposed development would introduce a significant quantum of new built form in the northern townscape context of the listed building. The nature of separation distances, street pattern, disposition of the application site relative to the listed building and interposing built form means that there would be no impact on the appreciation of the architectural character of the listed building as a high-quality 19<sup>th</sup> century church; best appreciated from the north and west, notwithstanding the comparatively minor increase in height of Blocks A, B, C and F. Whilst the additional height of Blocks A, B, C and F of the July 2020 amended proposed development would result in a minor relative increase in the visibility of new built form in the setting of this listed building, when compared to the May 2020 consented scheme, the disposition of individual buildings and variety in design would ensure that there is sufficient legibility of each component that it creates a layered composition. The July 2020 amended proposed development would, therefore, not impair an understanding of the group value of the listed building, derived from its wider 19<sup>th</sup> century context, or its role as a local landmark. Accordingly, in those terms, there would be no material change to the previously established impacts of the May 2020 consented scheme. The July 2020 amended proposed development would, therefore, preserve the special interest and setting of the listed building as a high-quality interpretation of the Early English Gothic style, which utilises a small palette of materials and a vertical emphasis in the design to create an attractive and imposing building with strong associations with architects Thomas Little, Sir Arthur Blomfield and A B Knapp-Fisher.

***Nos.2 and 3, St Marks Square (Grade II) / No.4, St Marks Square and No.36, Regent's Park Road (Grade II)***

4.49 The July 2020 amended proposed development would introduce a significant quantum of new built form in the distant townscape context of the listed building. The nature of separation distances, street pattern, disposition of the application site relative to the listed building and interposing built form means that there would be no impact on the appreciation of the architectural character of the listed building as high-quality 19<sup>th</sup> century domestic properties, notwithstanding the comparatively minor increase in height of Blocks A, B, C and F. Whilst the additional height of Blocks A, B, C and F of the July 2020 amended proposed development would result in a minor increase in the visibility of new built form in the setting of this listed building, when compared to the May 2020 consented scheme, the disposition of individual buildings and variety in design would ensure that there is sufficient legibility of each component that it creates

a layered composition. The July 2020 amended proposed development would, therefore, not impair an understanding of the group value of the listed building, derived from its wider 19<sup>th</sup> century townscape context. Accordingly, in those terms, there would be no material change to the previously established impacts of the May 2020 consented scheme. The July 2020 amended proposed development would, therefore, preserve the special interest and setting of the listed buildings as typical examples of mid-19<sup>th</sup> century, stucco villas, which share a commonality of materials, architectural style and detailing.

***Primrose Hill Infants School (Grade II) / Playground walls, railings and gates to Primrose Hill Infants School (Grade II)***

- 4.50 Due to the proximity to the MS parcel of the application site and the nature of the July 2020 amended proposed development, it would be a significant new element in the local townscape setting of the listed building, albeit those experiences are variable and include interposing built form and landscaping. From within the Primrose Hill Conservation Area context, predominantly as part of the townscape of Princes Street, the July 2020 amended proposed development would be partially visible, beyond a varied building stock (View 17). This is consistent with the historic distinction between the 'railway lands' associated with the tracks leading to/from Euston, the Camden Goods Yard and industrial context of the Grand Union Canal, where there would have been an awareness of the difference in character with the domestic context of Primrose Hill.
- 4.51 Whilst the July 2020 amended proposed development would be a new element in the wider townscape setting of the listed building the disposition of individual buildings and variety in design would ensure that there is sufficient legibility of each component that it creates a layered composition. The minor increase in the height of Block F would increase the visibility of new built form in views along Princes Street, it would not materially alter the previously established effects of the May 2020 consented scheme. In those terms, the July 2020 amended proposed development would not harm an appreciation the listed building's architectural character or legibility as a local landmark.
- 4.52 The experience of the listed building from the adjoining canal is more complex, with elevated views from the road bridges (Views 12 and 13) allowing a different appreciation of the listed building, where it forms a prominent element in the picturesque townscape context. From the elevated position of the Grafton Bridge (View 13), the July 2020 amended proposed development, would be a significant new element in the background context and interfere with the legibility and appreciation of part of the school's dense silhouette of gables and chimneys, which is currently experienced against sky. The increase in height of Blocks A, B, C and F as part of the July 2020 proposed amendments would not materially alter the previously established effect of the May 2020 consented scheme. In those overall terms, the July 2020 amended proposed development would result in a comparatively minor and localised degree of harm to the special interest of the listed building as an impressive example of a late 19<sup>th</sup> century Board School, designed in the Queen Anne Revival style, which typified the board's 'house style' with a picturesque composition that contrasts strongly with the prevailing 19<sup>th</sup> century domestic townscape context.

***The Engineer Public House and attached wall (Grade II)***

4.53 Due to the proximity to the MS Parcel of the application site and the nature of the July 2020 amended proposed development, it would be a significant new element in its local townscape setting, albeit those experiences are variable and include interposing built form and landscaping. From within the Primrose Hill context, the July 2020 amended proposed development would be partially visible, beyond a varied building stock. This is consistent with the historic distinction between the 'railway lands' associated with the tracks leading to/from Euston, the Camden Goods Yard and industrial context of the Grand Union Canal, where there would have been an awareness of the difference in character with the domestic context of Primrose Hill. Whilst the July 2020 amended proposed development would be a new element in the wider townscape setting of the listed building the disposition of individual buildings and variety in design would ensure that there is sufficient legibility of each component that it creates a layered composition.

4.54 In these experiences of the listed building, the July 2020 amended proposed development would result in localised adverse impacts on an appreciation of the building's significance i.e. when experienced as part of the varied 19<sup>th</sup> century context of Princes Street, where Block E1 erodes an appreciation of the strongly horizontally defined roof level and cornice, which form an integral part of its architectural character (View 17). The July 2020 proposed amendments, specifically the proposed increase in height of Blocks A, B, C and F, would not change that established impact of the May 2020 consented scheme or result in new adverse impacts, in light of their relative disposition to the listed building. On that basis, there would be no material change to the previously established impacts of the May 2020 consented scheme. Accordingly, the July 2020 amended proposed development would cause a comparatively minor and localised extent less of less than substantial harm to its significance as a handsome example of a 19<sup>th</sup> century public house and its associations with Calverts, the brewers, and its continued use as a public house.

***Primrose Hill Studios (Grade II)***

4.55 These listed buildings are a well-preserved composition of late 19<sup>th</sup> century artists' studio houses, designed in a picturesque cottage version of the Queen Anne style. This architectural interest is amplified by the compositional arrangement around a courtyard, and the variations in design, which adds visual interest. The buildings are also of value for their associations with a number of well-known artists. The listed buildings are concentrated around a central rectangular courtyard and as such, have an intimate and secluded character, which emphasises their group value and forms an integral element of the significance of the listed buildings. Due to the inward-looking nature of the buildings and their contrasting style, the wider surrounding residential townscape does not contribute strongly to their particular significance. Given this secluded character, varied context with associated degree of enclosure, separation distances to the application site and nature of the July 2020 amended proposed development there would be no impact on an appreciation of the particular heritage significance of these listed buildings, consistent with the impacts of the May 2020 consented scheme. Accordingly, the special interest of the listed building would be preserved.

***Nos.24-46 Chalcot Crescent and attached railings (Grade II)***

4.56 The significance of the listed buildings is derived from their strong group value as a terrace of high quality, mid-19<sup>th</sup> century, Classically-inspired stucco townhouses, which share a common material palette and architectural character. The heritage assets are representative of the development of Primrose Hill in the 19<sup>th</sup> century, into a new high-status residential area for the growing middle classes. The listed terrace is situated on the east side of Chalcot Crescent, and follows a curved building line that, along with the diversity of colours of each townhouse, provides a visually striking composition. As a result of the degree of enclosure, the separation distances and interposing form of development the July 2020 Proposed Development would have no impact on the architectural interest of this mid-19<sup>th</sup> century terrace or an appreciation of its role as part of a picturesque Victorian townscape, consistent with the assessment of the May 2020 consented scheme. In those terms the July 2020 amended proposed development would preserve the special interest and setting of these listed buildings.

***Nos. 1-11 Chalcot Square and attached railings (Grade II) / Nos.12, 13 and 14 Chalcot Square and attached railings (Grade II) / Nos.15-19 Chalcot Square and attached railings (Grade II) / Nos.20-28 Chalcot Square and attached railings (Grade II) / Nos. 29-33 and No.33A Chalcot Square and attached railings (Grade II)***

4.57 The significance of this group of listed building is derived, primarily, from their architectural composition of mid-19<sup>th</sup> century, Classically-influenced terraced townhouses. The buildings have a shared style and materiality, however, the diverse pastel colours gives a distinctive aesthetic, which differentiates the composition from the surrounding townscape. The assets are also of value in illustrating the ambition of the Southampton Estate, in creating the new high-status residential area of Primrose Hill in the early to mid-19<sup>th</sup> century. The listed townhouses have a largely inward-looking nature, and enclose Chalcot Square Gardens, which gives a sense of seclusion that is in contrast to the surrounding streets. This central green space provides an attractive setting, which complements the significance of the listed buildings.

4.58 Due to the strong degree of enclosure, separation distances, nature of interposing built form and the height of the July 2020 amended proposed development there would be no appreciation of the built form on the application site from within the square; accordingly, the experience and understanding of the strong group value of the listed buildings as a complete and cohesive 19<sup>th</sup> century architectural composition arranged around a garden square would be maintained (View A11). Consistent with the assessment of the May 2020 consented scheme, the July 2020 amended proposed development would preserve the special interest and setting of these listed buildings.

***Primrose Hill Tunnels (Eastern Portals) (Grade II\*)***

4.59 Primrose Hill Tunnels are of significance as a pair of 19<sup>th</sup> century railway tunnel portals designed as a grand architectural set-piece in the Classical architectural style. As noted in the list entry, this interest is enhanced by the assets' value as the first railway tunnel in London, and the first nationally to negotiate competing claims for the use of land in an urban context. The railway line forms part of the associated historic context of the asset and, due to the asset's location and the screening effect of the trackside trees, it is predominantly experienced in kinetic, linear views from the railway line. The asset has strong associative relationships with the associated Camden Incline Winding Engine House and the Roundhouse, which contribute positively to its significance, as



contemporaneous elements of railway infrastructure. The July 2020 amended proposed development forms part of the varied urban setting of the listed building, generally experienced at speed by rail passengers and train crew. The proposed development would not affect an appreciation of its architectural interest in approaches from the east or an understanding of its relationships with those elements of setting that contribute positively to its special interest, consistent with the assessment of the May 2020 consented scheme. In those terms the July 2020 amended proposed development would preserve the special interest and setting of this listed building.

***Church of St Silas the Martyr (Grade II\*)***

4.60 The significance of the listed building is principally manifested in its brick Gothic design and materiality, which creates an attractive and imposing building. The early 20<sup>th</sup> century church retains original features and displays distinctive design elements, which amplify its significance. The listed building is of historic interest for its associations with Ernest Charles Shearman, and as the asset is his first and most important church. Located within the varied urban townscape of Kentish Town, the listed building is largely experienced as part of a quiet, predominantly residential area and is situated on a site enclosed by a number of large scale buildings, of varying architectural style and quality, which do not contribute to the significance of the listed building. The degree of enclosure to the listed building by later surrounding built form, limited intervisibility with the local townscape context, separation distances and the nature of the July 2020 amended proposed development means that there would be no impact on the special interest of this listed building, consistent with the assessment of the May 2020 consented scheme. In those terms the July 2020 amended proposed development would preserve the special interest and setting of this listed building (View A2).

***Church of St Michael (Grade II\*)***

4.61 The significance of the Church of St Michael is primarily derived from its value as a high quality example of a late 19<sup>th</sup> century church, designed in the Decorated Gothic style, and its decorative interior, which amplifies the architectural interest of the building. The associations of the listed building with well-known architects G F Bodley and T Garner also contributes to its heritage value. The church is located on a busy A-road with a high level of vehicular traffic and is, therefore, experienced predominantly in kinetic views. It has a distinctive presence within the streetscape, due to its scale, architectural quality and detailing. Overall, its wider townscape setting makes a limited contribution to the significance of the listed building. The degree of enclosure to the listed building by later surrounding built form, limited intervisibility with the local townscape context, separation distances and the nature of the July 2020 amended proposed development means that whilst there would be increased visibility of new built form as a background element, understood to be located some distance away from the listed building, as a result of the increased height of Blocks A, B, C and F, when compared to the 2018 Consented Scheme, there would be no impact on the special interest of this listed building, given the nature of the modern, non-contributing townscape, which encloses the church and its particular special interest. In those terms the July 2020 amended proposed development would preserve the special interest and setting of this listed building.

***All Saints Greek Orthodox Church (Grade I)***

4.62 The significance of the listed building is invested, principally, in the impressive scale and distinctive form, which is heavily influenced by Greek Revival and Classical architecture, and in its associations with architects W and HW Inwood, a father and son who collaborated on a number of churches. The church is experienced as a standalone building that has a strong presence within the streetscape, due to its distinctive tower and prominent corner position. The St Martin's Gardens located opposite, and the mature trees that surround the church, provide attractive green elements of setting, which make a positive contribution to the significance of the listed building. The nature of interposing development and built form, the contribution made by setting to its heritage significance, separation distances and the nature of the July 2020 amended proposed development means that there would be no impact on an understanding of the church's particular architectural or historic interest, consistent with the assessment of the May 2020 consented scheme. In those terms the July 2020 amended proposed development would preserve the special interest and setting of this listed building.

***Nos. 2-16, 22-34, 36A and 36B Park Village East and attached railings (Grade II\*)/ Nos.1-8, 10-14 and 17-19 Park Village West and attached railings (Grade II\*)***

4.63 The significance of the listed buildings is primarily manifested in their group value as a cohesive composition of early 19<sup>th</sup> century stucco houses, which share common characteristics; however, the variation in design of the group creates visual interest as a picturesque composition within the streetscene. The assets also derive value from their association with Nash, as part of his ambitious scheme for the redevelopment of the area during the 19<sup>th</sup> century. The listed buildings form part of a high quality townscape of predominantly early 19<sup>th</sup> century residential properties, situated to the east of Regent's Park. The area has a quiet residential character, despite the close proximity of busy main roads, which contributes positively to their significance. The abundance of street trees and the nearby Regent's Park also contribute positively as attractive green elements of setting with reciprocal relationships as part of the cohesive, pioneering example of early 19<sup>th</sup> century picturesque design. The nature of interposing built form, the contribution made by setting to their heritage significance, separation distances and the nature of the July 2020 amended proposed development means that there would be no impact on an understanding of the listed buildings' particular architectural or historic interest, group value or relationships to positive elements of setting, including Regent's Park, consistent with the assessment of the May 2020 consented scheme. In those terms the July 2020 amended proposed development would preserve the special interest and settings of the listed buildings.

***No.15 and attached boundary walls and piers (Grade II\*) / Gloucester Lodge (No.12) Gloucester House (No.14) and attached boundary wall (Grade I) / Nos.2 to 11 Gate and attached railings (Grade I)***

4.64 These listed buildings derive their heritage significance as part of the planned, early 19<sup>th</sup> century picturesque composition enclosing Regent's Park. They are of a grand and imposing scale and are of a classical character that typifies most of the built form that encloses the park. There is a strong reciprocal relationship between the listed buildings and the contemporaneous landscaped park, which they help to enclose, as well as the complementary early 19<sup>th</sup> century building stock, which formed part of Nash's original masterplan. Due to the separation distances and alignment of the application site to the listed buildings there would be no impact on the legibility of the buildings'

architectural character or on the historic designed interrelationship with Regent's Park or other positive elements of setting as a result of the July 2020 amended proposed development, consistent with the assessment of the May 2020 consented scheme. Accordingly, the July 2020 amended proposed development would preserve the special interest and settings of these listed buildings.

**Nos. 1-3 and 6-9 and attached railings (Grade II\*) / The Danish Church (Grade II\*) / Nos.4 (The Pastors House) and 5 (St Katherine's Hall) and attached screen walls (Grade II\*)**

4.65 The special interest of the buildings is derived, primarily from their high architectural quality, as a group of English Gothic-Revival buildings, located on the edge of Regent's Park. The buildings display a strong group value, resulting from their shared materiality and architectural features which demonstrate ecclesiastic influences. The church is an attractive example of Victorian Gothic architecture, designed by one of the leaders in ecclesiastical design. The association with architect, Poynter, further elevates the interest of the buildings, as well as their relationship with Regent's Park, and the surrounding high quality Italianate villas, which make up Nash's planned townscape. The visibility of the listed buildings between the trees from within Regent's Park allows a greater appreciation of their group value and disposition and affords views between the church and adjoining buildings to the wider context. The oblique views of the buildings along the Outer Circle provide visibility of the picturesque roofscape and a compositional quality, which further enhances their group value. Due to the separation distances and alignment of the application site to the listed buildings, there would be no impact on the legibility of the buildings' architectural character or on the historic designed interrelationship with Regent's Park or other positive elements of setting. Accordingly, the July 2020 amended proposed development would preserve the special interest and settings of these listed buildings, consistent with the assessment of the May 2020 consented scheme.

**Conservation Areas**

***Regent's Canal Conservation Area***

4.66 The significance of the conservation area is derived from the almost hidden nature of the canal, which creates a tranquil space, distinct from the surrounding area, and the planning, layout and varying levels of the canal's route, which contribute to its character. The industrial buildings, structures and archaeology also form an important part of its historic character and appearance, as does the changing and varying character along different sections of the canal. The conservation area's setting is formed of the dense urban townscapes of Camden Town and Kentish Town, which consist of differing architectural styles and character, although principally of 19<sup>th</sup> century date. This built form is representative of the development of the surrounding area and contributes to the changing character of the canal along its length. The railway line and elements of the former Goods Yard, which form part of the immediate setting, are reminiscent of the former function of the canal and as such, make a positive contribution to significance.

4.67 The July 2020 proposed amendments include no changes to the approved PFS Parcel, the development of which remains in accordance with the May 2020 consented scheme. It is, therefore, not necessary to consider the impacts of that element of the July 2020 amended proposed development on the significance of this conservation

area in detail as part of this report. For the sake of completeness, it is confirmed that the PFS Parcel, the only part of the July 2020 amended proposed development to have a direct impact on the significance of the conservation area, would enhance its character or appearance.

- 4.68 The development of the MS parcel as part of the July 2020 amended proposed development would form a new element in Chalk Farm Road, albeit as part of a varied urban context, in the kinetic experience moving along Chalk Farm Road (Views 21 and 22 and 28-31), as well as in linear views along Harmood Street (View 24), Hartland Road (View 25) and Ferdinand Street (View 23). Whilst the July 2020 amended proposed development would be experienced as part of these kinetic experiences, and be more prominent in some parts of those local views due to the increased height of Blocks A, B, C and F, when compared to the May 2020 consented scheme, the new buildings would be seen behind and against the context of the more recent market buildings, which are taller and of a contrasting contemporary character to the listed building, and would, in that sense, be consistent with the existing and emerging character of the asset's setting.
- 4.69 As identified in the Design and Access Statement Addendum, the July 2020 amended proposed development is of a high-architectural quality that responds to both its particular history and the varied character of the wider context in which it is located. The disposition of new development within the MS Parcel and the variety in forms, heights and massing, results in layered and complex relationships in the setting of the conservation area and avoids overbearing and unrelieved masses when experienced as part of its setting.
- 4.70 Moreover, such relationships from outside of the market complex are consistent with its historic distinction from the surrounding context. The robust and substantial retaining wall to the Chalk Farm Road, historically, marked the interface and boundary between the railways related infrastructure and the varied domestic/commercial townscape to the north, where there are existing contrasts in scale, character and patterns of activity.
- 4.71 From within the Camden Market complex as a whole, when experienced at street level, the July 2020 amended proposed development is likely to have a significant presence from limited locations, due to the scale of interposing, recent market buildings and the railway viaduct, and the associated sense of enclosure. Where visible from within the markets, particularly from the upper levels of the remaining traditional railway related buildings, July 2020 amended proposed development would be understood in the context and beyond these more modern market buildings, where there is a transition between the historic character of the markets and the application site.
- 4.72 The experience of the July 2020 amended proposed development in views along the canal is more complex, arising from the changes in level between two paths and elevated bridges and the means of experiencing this part of the conservation area i.e. on foot, via watercraft, by bicycle etc. and the kinetic qualities of the movement of water and associated noise. The impact of the July 2020 amended proposed development would be dependent upon the relative location on the canal and spatial level (Views 8 and 32-34).

- 4.73 From the eastern part of the conservation area, the upper elements of July 2020 amended proposed development would have a presence as new elements of the varied urban context visible from the canal (View 8). Whilst of a greater scale than the prevailing built form, it would not impair the legibility of key interrelationships between historic industrial buildings and the waterway as part of the understanding of their significance.
- 4.74 Further west, where the canal interacts with Camden Market, there is an important collection of listed buildings (considered separately earlier in this Section). These elements of the conservation area form part of a complex and rich spatial experience that allows an understanding of the historic legacy of the functional interrelationships between the canal, railway and road networks associated with Camden Goods Yard, located to the northwest. In that regard, they are one of the more significant elements of the conservation area.
- 4.75 The July 2020 amended proposed development has been carefully designed to be a minor element in the experience of these heritage assets, particularly from along the canal, where the important historic interrelationships are best understood (Views 32-34 and A9). In this context, the nature of existing and previously approved new buildings within the adjoining market means that for the most part, the July 2020 amended proposed development would sustain an understanding of the contribution made by these buildings to the significance of the conservation area, notwithstanding the increased height of Blocks A, B, C and F. The increase in height of Block C would, however, increase the localised visibility of new built form within the application site relative to the Interchange Building as a positive element of the character of the conservation area. As assessed earlier in this Section, the July 2020 amended proposed development distract from an appreciation of the architectural quality of the Interchange Building from parts of its canal side context within the conservation area and, in those terms, have an adverse impact on its significance (View A9). Where the July 2020 amended proposed development is visible as part of this experience of this part of the conservation area, it would be a comparatively minor element, visible in part of the townscape context where the contemporary market buildings form part of the existing backdrop. These relationships arising from the July 2020 amended proposed development would have a minor adverse impact on the overall legibility of this group and on the character or appearance of the conservation area as a whole, amplified to a minor degree when compared to the assessed effects of the May 2020 consented scheme.
- 4.76 There would be further impacts on the significance of the conservation area, where it interfaces with the immediate townscape context of the Interchange Building, including Gilbeys Yard (the late 20<sup>th</sup> century buildings are not located within the boundary of the conservation area). This area has been, historically, extensively altered with the erection of the existing residential development, the artificial separation from the MS parcel, the extensive areas of car parking and servicing areas and satellite dishes/back of house areas associated with the current operation of the Interchange Building. This is not an area where it is best possible to appreciate the contribution made by the Interchange Building and associated historic public realm the historic character/function of this part of the conservation area, albeit it does provide important elements in the understanding of its role at the historic interface between

rail, road and canal. These remaining elements of setting, which provide some continuity of the former functional links between the MS Parcel and this immediate context, includes the cobbles/setts, rail tracks, ventilation grilles and the subterranean horse tunnels (although public access is currently not possible), all of which would be retained by the July 2020 amended proposed development.

- 4.77 The July 2020 amended proposed development would reinstate, where possible, connections to this part of the wider townscape context, utilising a language and palette of materials that resonates with the former function of the Camden Goods Yard and those remaining elements beyond the application site boundary, including the Interchange Building, public realm materials and horse tunnels. The July 2020 amended proposed development would replace the existing extensive surface car parking and non-descript food store building, incongruous elements of the conservation area's setting, with a high-quality, integrated urban area that has been developed from an understanding of the application site's historic uses and current townscape context. The revised landscaping proposals maintain the design ethos, character and materiality of the May 2020 consented scheme. It is understood from Chapter 5 of the ES, that there would be no construction activities associated with the proposed development from Gilbeys Yard, so there would be no impact on historic paving materials and street furniture cobbles/setts, rail tracks, ventilation grilles and the subterranean horse tunnels.
- 4.78 There are longer distance views into the conservation area, looking northward along Oval Road into the designated area (Views 35-37). The July 2020 amended proposed development would have a limited impact on this element of setting, being limited to a presence in views northwards along Oval Road, beyond the existing built form of Gilbeys Yard. This new built form would form part of the varied built context to the north of the listed buildings that tends to increase in scale and mass towards the Grand Union Canal. This part of the assets' setting already includes contrasts in scale, character and materiality and the presence of new, high-quality urban development within this part of its setting would have no impact upon an understanding of the character or appearance of the conservation area as a whole. The proposed increase in the heights of Blocks A, B, C and F, as part of the July 2020 proposed amendments, would not materially change the assessed effects of the May 2020 consented scheme in this part of the conservation area.
- 4.79 In overall terms, notwithstanding the increase in height of Blocks A, B, C and F and the associated localised area of greater visibility of new built form in the varied townscape setting of the conservation area, the July 2020 amended proposed development would, in overall terms, preserve the significance of the heritage asset through the transformation of an incongruous and unattractive site, which forms a sizeable element of its setting and a poor quality element of the designated area at the interface of the application site with Chalk Farm Road, consistent with the findings of the assessment of the May 2020 consented scheme.

#### ***Primrose Hill Conservation Area***

- 4.80 The Primrose Hill Conservation Area is of significance as a smart residential area of mid-19<sup>th</sup> century speculative residential development, which displays the fashion for Classically-influenced architecture of the period throughout London. The high quality

townscape and consistency of materiality and scale lend unifying characteristics to the more variable patterns of terraces, squares and streets, which are illustrative of the area's speculative development. The setting of the conservation area comprises the open green spaces of Primrose Hill and Regent's Park to the south-west, which complement the special interest of the conservation area and therefore contribute positively to its significance. To the north-east is the railway line and contrasting urban townscape of Chalk Farm and Camden Town, which contribute to the conservation area through providing evidential value of the development of this part of London in the 19<sup>th</sup> century.

- 4.81 The impacts of the July 2020 amended proposed development on the significance of the listed buildings contained within the Primrose Hill Conservation Area have been assessed earlier in this Section and identified a degree of less than substantial harm to a small number of those heritage assets.
- 4.82 The July 2020 amended proposed development would, as a matter of course, result in changed and new experiences in the setting of the conservation area. This is the case for any development of the application site, which optimises its development potential, in accordance with the objectives of the NPPF and Development Plan. Due to the nature of the conservation area's street pattern and resulting tight urban grain/sense of enclosure, the extent and magnitude of the impact is variable. Generally speaking, the closer that elements of the conservation area are to the application site and the greater the alignment of streets towards the application site, the greater the likely prospects of intervisibility and potential impact on its particular heritage significance.
- 4.83 In considering the impact of the July 2020 amended proposed development on the significance of the conservation area; there is a general awareness that the curving northern and eastern boundary, located in closest proximity to the application site, is defined by the railway with a contrast in scale, activity and character beyond. Such distinctions were, historically, more pronounced, with substantial railway structures (since demolished); noise from locomotives and nearby industrial processes having a greater presence within the conservation area than is currently the case.
- 4.84 The July 2020 amended proposed development would be a significant new element in the setting of the conservation area. When experienced in linear views along Princess Road (View 17) and Edis Street (View 18), it would form a new background element that contrasts with the strong horizontal emphasis of the building stock within the conservation area (albeit that the building stock on that part of Gloucester Avenue is more variable than otherwise found in the conservation area). The mere visibility of new built form in this part of the conservation area's context is not harmful, as a matter of principle, being consistent with the historic distinction between the 'railway lands' associated with the tracks leading to/from Euston, the Camden Goods Yard/industrial context of the Grand Union Canal and the domestic context of Primrose Hill. In this instance, however, whilst the disposition of individual buildings and variety in design would ensure that there is sufficient legibility of each component to create a layered composition, the scale, height and mass of Blocks A, B, C and F of the July 2020 amended proposed development would contrast strongly with the otherwise consistent townscape that defines this part of the conservation area and distract from

an appreciation of these qualities, consistent with the assessment of the impacts of the May 2020 consented scheme.

- 4.85 Where the July 2020 amended proposed development would also change the experience of the approach to the conservation area from the north and south, along Gloucester Avenue, this would be in the context of extensive later development and railway infrastructure (Views 15 and 16). In these instances, the experiences of the contrast in scale and form with the building stock within the conservation area would generally be less pronounced and would not result in a harmful diminution of the legibility of the 19<sup>th</sup> century domestic townscape.
- 4.86 The July 2020 amended proposed development would not materially impact on the experience of the principal north-south axis, Fitzroy Road (View A12), and appreciation of its role in the conservation area's street hierarchy and its grand urban scale.
- 4.87 From the section of the Grand Union Canal within the conservation area, the July 2020 amended proposed development would be a significant new element in the experience of this part of the designated area (Views 12-14). The existing character is verdant and mature, with elements of the 19<sup>th</sup> century townscape (of a varied character and age) providing an informal and iterative setting, resulting in a rus-in-urbe quality. For the most part, the July 2020 amended proposed development would be consistent with the prevailing scale and variety and built form of development that forms part of the townscape context, with only the taller elements of Blocks A and B contrasting strongly with the prevailing character, notwithstanding the design quality identified in the Design and Access Statement Addendum. The strength of contrast of these vertical forms, emphasised by their contrasting relationship to the canal (an unavoidable consequence of the application site not having a canal frontage) means that there would be some adverse effects arising in this part of the conservation area, albeit not significantly greater than that assessed for the May 2020 consented scheme.
- 4.88 In elevated views from Primrose Hill, the July 2020 amended proposed development would be a significant new addition to the local townscape (View 2). It would be experienced as part of the varied urban context of the conservation area, through existing soft landscaping. It would be experienced as contrasting elements to the prevailing character of the conservation area, albeit seen at some distance, and clearly as a background element that does not undermine an appreciation of the consistent 19<sup>th</sup> century townscape.
- 4.89 In overall terms, the July 2020 amended proposed development would result in localised areas of adverse impact on the significance of the conservation area. Those adverse impacts of the July 2020 amended proposed development would be amplified to a minor degree in some locations, when compared to the assessed impacts of the May 2020 consented scheme, due to the increased height and scale of Blocks A, B, C and F. In overall terms, whilst the redevelopment of the PFS Parcel of the application site would preserve the character or appearance of the conservation area, the July 2020 amended proposed development of the MS Parcel would cause less than substantial harm to the significance of the conservation area as a whole, consistent with the assessment of the impacts of the May 2020 consented scheme.



### ***Harmood Street Conservation Area***

- 4.90 The conservation area's significance arises from the retention of a large proportion of the stock brick terraced houses of 'cottage' character, which form part of the area's original phase of 19<sup>th</sup> century development. The conservation area is predominantly residential and encompasses the principal road of Harmood Street and a number of smaller streets leading off it, all of which have a broadly unified architectural style and material palette. The setting of the conservation area consists of the railway line to the east and the surrounding townscapes of Kentish Town, Belsize Park, Chalk Farm and Camden Town. This surrounding varied context, primarily of 19<sup>th</sup> date, contributes to the significance of the conservation area as it is illustrative of the overall development of the surrounding area.
- 4.91 It is only the proposed development of the MS Parcel that would impact on the significance of the conservation area. This impact on the significance of the conservation area would be localised in extent due to the curve in the street pattern and the nature of enclosing development. The July 2020 amended proposed development would be a significant new element in part of the townscape setting of the conservation area (View 24). New built form within the application site would be visible behind the historic and comparatively recent Camden Market buildings, with the level of visibility increased from that associated with the May 2020 consented scheme, due to the proposed increase in heights of Blocks B and C.
- 4.92 Notwithstanding the minor increased heights of those blocks as part of the July 2020 amended proposed development, there are existing contrasts in scale and materiality with the building stock within the market and along Chalk Farm Road, reflecting the historic differences between the domestic scale of the conservation area and the more commercial and industrial scale of its southern context. The July 2020 amended proposed development would be consistent with this legacy of townscape contrasts. Whilst of a high-architectural quality, with the disposition of development creating varied and layered relationships between the proposed buildings, the strength in contrast of the form, height and massing of the proposed buildings to the modest 19<sup>th</sup> century townscape of the conservation area, would result in localised areas of harm, albeit in part of the conservation area with a more varied townscape context. In those terms, the July 2020 amended proposed development would result in a degree of less than substantial harm to the significance of this heritage asset, consistent with the assessment of the impacts of the May 2020 consented scheme.

### ***Camden Town Conservation Area***

- 4.93 The Camden Town Conservation Area is of significance as a predominantly 19<sup>th</sup> century urban townscape consisting of two distinct character areas; a busy commercial and retail area and a quieter residential area. The commercial area has a dynamic and bustling character and is defined by a variety of building types and styles, whereas the residential area has a more uniform character, displaying stock brick and stucco terraces. The area is bounded by the railway line to the south west, and is surrounded by the predominantly 19<sup>th</sup> century townscapes of Kings Cross, Chalk Farm and Kentish Town, which contribute to the significance of the conservation area as they provide evidential value of the evolution of the area. Due to the separation distances, interposing built form and alignment of street patterns, the July 2020 amended proposed development would have no impact on the significance of the conservation

area as a whole (Views 9 and A6-A8), consistent with the assessment of the impacts of the May 2020 consented scheme. Accordingly, the character or appearance of the conservation area would be preserved.

### **Registered Parks and Gardens of Special Historic Interest**

#### ***Regent's Park (Grade I)***

- 4.94 The significance of the RPG is as a key element of John Nash's major improvement scheme of 1811-28, for north-west London which also included Regent Street; as one of the most ambitious urban parks of the early 19<sup>th</sup> century. Significance is also invested in specific elements of its designed landscape, such as WA Nesfield's Italian Garden of 1864 and the near-contemporary English Garden by his son Markham. Significance is also invested in its value as a substantial aspect of the setting for a large number of listed structures within it, including early 19<sup>th</sup> century villas and those of the Zoological Gardens, and the surrounding terraces.
- 4.95 The impact of the July 2020 amended proposed development on the extensive designated landscape would be localised, arising from the development of the MS Parcel. For the most part, the July 2020 amended proposed development would have no impact on the designated landscape or the heritage contained therein due to the nature of separating distances, interposing landscaping and built form and relative dispositions.
- 4.96 The accurate visual representations submitted with July 2020 s73 application demonstrate that from key structural elements of the historic landscape, the July 2020 amended proposed development would not be a visible or perceptible new element of its townscape context, even in winter months when foliage is at its least dense (View A1). Moreover, the proposed development would not be perceptible from within the park in conjunction with the contemporaneous early 19<sup>th</sup> century enclosing development that has an important reciprocal relationship with the designed landscape and integrated picturesque design. Accordingly, consistent with the assessment of the impacts of the May 2020 consented scheme, the July 2020 amended proposed development would sustain an understanding and appreciation of the significant structural elements of the historic landscape design and its relationship to its contemporaneous urban setting.
- 4.97 The upper levels of the July 2020 amended proposed development would be visible in some views in the north-eastern 'quadrant' of Regent's Park, in an area of more informal parkland character, as new elements of the urban setting that forms the distant, variable context of the heritage asset (Views 10 and 11). Parts of the July 2020 amended proposed development would be seen through existing soft landscaping (with seasonally defined dynamic effects) and in the context of the later, grade II listed villas that enclose the northern side of the park. These villas on Prince Albert Road do not, however, form part of the originally planned and delivered contemporaneous enclosing built form to the park. As such, they do not have the same strength of reciprocal, historic interrelationships with the overall picturesque landscape design. Those parts of the July 2020 amended proposed development visible from this part of Regent's Park would be legible as individual, minor elements, predominantly through

mature tree cover; consistent with the assessed impacts of the May 2020 consented scheme.

- 4.98 Those parts of the May 2020 Amended Proposed Development visible from the north-eastern section of the park would be legible as individual, minor incidental elements, predominantly through mature tree cover, set c.500m from Regent's Park. The degree of enclosure within this part of the park means that there are limited opportunities to appreciate the intended views to the rising hills of Hampstead and Highgate to the north. In those terms, whilst there would be a minor increase in the visibility of the upper floors of part of the July 2020 amended proposed development, that increased visibility would not impact on the park's intended reciprocal relationship with the wider context to the north; the currently available glimpsed views would remain.
- 4.99 In overall terms, whilst there would be a minor increase in the visibility of the upper floors of part of the July 2020 amended proposed development; there would be no material change in the nature or extent of perceived impacts on the particular significance of this heritage asset. As such, the July 2020 amended proposed development would have a localised and minor impact on the significance of Regent's Park as a new element of its townscape context. In being visible above the strong tree line that defines the edge of the more naturalistic parkland landscape in the north-east quadrant, the July 2020 amended proposed development would be consistent with elements of the existing urban setting.
- 4.100 Any perceived harm that may arise from the awareness of the July 2020 amended proposed development from this localised area of the designated landscape would be comparatively modest and less than substantial for the purposes of the NPPF for the following reasons:
- **Seasonal variation in impact:** The impact of the July 2020 amended proposed development on the significance of Regent's Park would not be consistent throughout the year. It is dependent upon the extent of foliage/tree cover, and would be greatest in the winter months when this tree coverage is at its thinnest. Conversely, the impact would be much reduced in the summer months, when the upper elements would be seen in the backdrop of this part of the park through mature canopies. The long-term management and replacement (as necessary) of this landscape element is anticipated, given its importance to the character and heritage significance of Regent's Park, as outlined in the published Conservation Management Plan.
  - **Disposition of form and materiality:** The upper elements of the July 2020 amended proposed development visible from this part of Regent's Park are clearly articulated as individual elements, reflecting their disposition within the application site. Moreover, the proposed materiality of these upper elements further reinforces their recessive character as new background townscape elements. As a result, given the separating distance between Regent's Park and the application site, the upper levels of the July 2020 amended proposed development would be 'perceived' as a recessive element consistent with the scale, character and form of more recent built form located in this part of the asset's context.

- **Relationship to Regent’s Park as a whole:** The July 2020 amended proposed development would have no impact on an appreciation of the important reciprocal relationship between the enclosing, contemporaneous built form and the picturesque landscape. Moreover, there is no impact on an appreciation or understanding of the important structural elements of the picturesque landscape, which comprise a major part of the park’s heritage significance.
- **Extent of impact:** The identified adverse impact relates to a comparatively small part of the heritage asset as a whole, as one part of the complex experiential component of the setting of the heritage asset. Moreover, the historic, intended prospects towards the hills of Hampstead and Highgate are no longer prominent, being restricted by mature soft landscaping and trees, which define the north-eastern boundary. Where such glimpsed views of these aspects of the northern context remain, their legibility would not be adversely impacted by the July 2020 amended proposed development. The extent of visibility is comparatively minor and relates to the uppermost storeys of part of the July 2020 amended proposed development in part of the park where awareness of built form in its wider townscape forms part of the experience of its setting. The materiality, form and separation distances of the July 2020 amended proposed development means that it would be a recessive background element that would not significantly impair an understanding of the particular significance of these heritage assets.
- **Identified Views:** The importance of the contribution made by these views to the particular significance of the heritage assets is not identified as one of the ‘Key Historic and Modern Views’ in the ‘Regent’s Park and Primrose Hill Conservation Management Plan’, prepared by the Royal Parks.

#### **Locally Listed Buildings (Non-Designated Heritage Assets)**

##### ***Nos.2-8 (even) Ferdinand Street***

4.101 The locally listed buildings are modest, late 19<sup>th</sup> century examples of the well-established urban typology of residential accommodation above commercial/retain units. They are attractive, typical examples of this typology, constructed of stock brick with contrasting red brick dressings, albeit the painting of much the first floor brickwork has obscured this detailing. The setting of these properties is highly variable.

4.102 The locally listed buildings, and the 2020 June Amended Proposed Development, would also be experienced in conjunction with each other, albeit as part of a varied urban context, primarily as part of the kinetic experience of moving along Chalk Farm Road (Views 30 and 31) and in linear views along Ferdinand Street (View 23). Whilst the July 2020 amended proposed development of the MS Parcel would be experienced as part of the kinetic experience and linear view, the new buildings would be seen behind and against the context of the more recent market buildings, which are taller and of a contrasting contemporary character to the listed building, and would, in that sense, not be incongruous. The proposed minor increase in heights of Blocks A, B, C and F that form part of the July 2020 proposed amendments would not materially alter the magnitude and character of the change in the setting of these buildings, when compared to the May 2020 consented scheme.

- 4.103 As identified in the Design and Access Statement Addendum, the July 2020 amended proposed development is of a high-architectural quality that responds to both its particular history and the varied character of the wider context in which it is located. The disposition of new built form within the MS parcel and the variety in forms, heights and massing results in layered and complex relationships in the setting of the locally listed buildings and avoids overbearing and unrelieved masses. Moreover, such relationships from outside of the market complex are consistent with its historic distinction from the surrounding context. The robust and substantial retaining wall to the Chalk Farm Road historically marked the interface and boundary between the railway's related infrastructure and the varied domestic/commercial townscape to the north, where there are existing contrasts in scale, character and patterns of activity. The proposed minor increase in heights of Blocks A, B, C and F maintain the character and form of the new relationships assessed in the context of the May 2020 consented scheme.
- 4.104 Accordingly, in overall terms, the local heritage significance of these buildings would be sustained by the July 2020 amended proposed development, whilst the redevelopment of the PFS parcel would enhance an element of their setting, as previously identified.

***Nos.36-37 Chalk Farm Road***

- 4.105 This building is principally of architectural interest as an imposing, eclectic and high-quality example of later 19<sup>th</sup> century Italianate commercial architecture. It forms an attractive corner building, which defines the street junction of Chalk Farm Road and Harmond Street; best appreciated when approaching from the south along Chalk Farm Road. The urban context of the building is highly variable and the contribution made by setting is therefore not consistent. Where remnants of the 19<sup>th</sup> and early 20<sup>th</sup> century townscape context survive, it contributes positively to their significance by virtue of shared materiality, scale and character and from what it helps to illustrate about the origins of the buildings and local area.
- 4.106 Whilst the July 2020 amended proposed development of the MS Parcel would be experienced as part of the kinetic experiences of moving north and south along Chalk Farm Road (Views 28-31), the new buildings would be seen behind and against the context of the more recent market buildings, which are taller and of a contrasting contemporary character to the listed building, and would, in that sense, not be incongruous. Accordingly, the proposed development would not impair an appreciation of the building's architectural quality in the views moving north and south, where the canted corner entrance bay is best appreciated. Notwithstanding the minor increased height of Blocks A, B, C and F, there would be no change in the relationships and impact assessed as part of the May 2020 consented scheme. As identified in the Design and Access Statement Addendum, the July 2020 Proposed Development within the MS Parcel is of a high-architectural quality that responds to both its particular history and the varied character of the wider context in which it is located. The disposition of new built form within the MS Parcel and the variety in forms, heights, massing and disposition of individual buildings results in layered and complex relationships in the setting of the locally listed building and avoids overbearing and unrelieved masses. The robust and substantial retaining wall to the Chalk Farm Road, historically, marked the interface and boundary between the railways related

infrastructure and the varied domestic/commercial townscape to the north, where there are existing contrasts in scale, character and patterns of activity.

- 4.107 When viewed from Harwood Street (View 24), as part of a kinetic experience, the July 2020 amended proposed development would be a significant new element located beyond the locally listed building and experienced against the plain rear elevation and roof profile, which are not experiential elements of setting, which contribute strongly to its local heritage significance. Accordingly, given the separation distances between the heritage asset and the MS Parcel (across Chalk Farm Road, the market complex and the railway viaduct), the historic distinction between the railway and wider townscape, street alignment and the later interposing built form there would be no impact on the particular local heritage significance of this building arising from the July 2020 amended proposed development. Accordingly, consistent with the assessment of the impacts of the May 2020 consented scheme, the July 2020 Proposed Development would sustain the local heritage significance of this building.

**No.1a Harwood Street**

- 4.108 This is an attractive example of late 19<sup>th</sup> or early 20<sup>th</sup> century industrial architecture. The architectural interest is derived from its unadorned façade and the understanding of the importance of plan form and large window openings in understanding its historic function. The historic interest of the building is derived from its role in illustrating the importance of industry to the local area. The urban context of the building is highly variable and the contribution made by setting is, therefore, not consistent. Whilst the development of the MS parcel would be visible at the end of Harwood Street, beyond the layered buildings of the market complex, this would not result in the removal or alteration of any elements of existing setting, which contribute positively to the significance of this locally listed building. Moreover, due to the relative disposition of the July 2020 amended proposed development within the MS Parcel and the locally listed building and the presence of interposing built form on Chalk Farm Road there would be no impact or interruption of the legibility of its architectural character or role in illustrating the importance of 19<sup>th</sup> and 20<sup>th</sup> century industry to the local area, which is best appreciated when the building is experienced face on from the eastern side of Harwood Street (View 24). Accordingly, notwithstanding the minor increases in height of Blocks A, B, C and F, there would be no material changes to the previously assessed impacts of the May 2020 consented scheme and the local heritage significance of this building would be sustained.

**Nos. 1-55 Hartland Road (odd-west side)**

- 4.109 The locally listed buildings are an attractive, albeit typical example, of modest mid-19<sup>th</sup> terraced housing. The retention of original decorative detailing and the general consistency in scale and materiality is the basis of their local heritage significance. The application of later paint finishes emphasises the individuality of the properties and results in an idiosyncratic townscape character. Where remnants of the 19<sup>th</sup> and early 20<sup>th</sup> century townscape context survive, this element of setting contributes positively to their significance by virtue of shared materiality, scale and character and from what it helps to illustrate about the origins of the local area.
- 4.110 Whilst the July 2020 Proposed Development of the MS Parcel would be visible at the end of Hartland Road, rising beyond the layered buildings of the market complex, this

would not result in the removal or alteration of any elements of existing setting, which contribute positively to the significance of these locally listed buildings (View 25). Moreover, due to the relative disposition of the proposed built form within the MS Parcel and the locally listed buildings and the presence of interposing built form on Chalk Farm Road there would be no impact or interruption of the legibility of their architectural character as a long terrace, 19<sup>th</sup> century domestic terrace, particular in important views north, towards the grade II listed Church of the Holy Trinity with St Barnabas, whose stone tower is visible rising above the railway viaduct. Accordingly, notwithstanding the proposed increase in height of Blocks B and F as part of the July 2020 proposed amendments, there would be no changes to the previously assessed new additions to the townscape setting of these locally listed buildings and associated impacts of the May 2020 consented scheme. On that basis, the July 2020 amended proposed development would sustain the particular heritage significance of these locally listed buildings.

***Holy Trinity and St Silas Primary School, Hartland Road***

4.111 The significance of this mid-19<sup>th</sup> century building is derived from its architectural character, which illustrates trends in the provision of education provision and school design and the role of the church prior to mandatory state education. The ecclesiastical detailing harmonises with the nearby Holy Trinity church. The relative disposition and siting of the church means that it is best appreciated in views westward from the church, which together with the mature soft landscaping form an attractive townscape group, which amplifies their respective significance. Due to the nature of the local townscape context (including proximity to the railway viaduct), separation distances and nature of the July 2020 amended proposed development there would be no impact on the local heritage significance of this 19<sup>th</sup> century school building or the positive elements of setting, notably the relationships and proximity to the listed Church of the Holy Trinity with St Barnabas and contemporaneous context to the north. Accordingly, its local heritage significance would be sustained; consistent with the previously assessed impacts of the May 2020 consented scheme.

***Nos.39-49 (odd) and Nos.54-76 (even) Hadley Street and Nos.14 & 16 Lewis Street and street surfacing***

4.112 The principal elements of heritage significance of these locally listed buildings is derived from their architectural value as a cohesive mid-19<sup>th</sup> century townscape, amplified by the remaining traditional elements including Holy Trinity Church and the St Giles Primary school. Due to the nature of the local townscape context (including the degree of enclosure), separation distances and nature of the July 2020 amended proposed development there would be no impact on the local heritage significance of this 19<sup>th</sup> century townscape group or the positive elements of setting, notably the relationships and proximity to the listed Church of the Holy Trinity with St Barnabas and locally listed Holy Trinity and St Silas Primary School. Accordingly, the local heritage significance of these non-designated heritage assets would be sustained; consistent with the previously assessed impacts of the May 2020 consented scheme.

***Tapping the Admiral PH, No.77 Castle Road***

4.113 The building is an attractive example of a mid-19<sup>th</sup> century public house with later ground floor extensions, which illustrates the growth and importance of pubs to historic local communities. Its comparative scale and siting at a complex interface of

streets and raised railway viaducts gives the building a prominent townscape role in defining the local townscape. Due to the nature of the local townscape context, separation distances and nature of the July 2020 amended proposed development there would be no impact on the local heritage significance of the public house or the positive elements of setting, notably the relationships with the remaining elements of the contemporaneous townscape context in which it is located. Accordingly, the local heritage significance of this non-designated heritage asset would be sustained; consistent with the previously assessed impacts of the May 2020 consented scheme.

***No.41 Clarence Way (corner Castlehaven Road)***

4.114 The locally listed building's significance is derived from its local 'rarity' value as a mid-19<sup>th</sup> century survivor of the traditional townscape that was largely replaced in the mid-late 20<sup>th</sup> century. The building was originally a public house and has since been converted to alternative uses and whilst the original architectural character remains legible the associated alterations and extensions have not always been consistent with its original appearance. Holy Trinity church, located to the west of the heritage asset, provides a link to the wider 19<sup>th</sup> century townscape that survives to a greater degree to the west, however, the strength of this contribution is diminished by interposing 20<sup>th</sup> century residential development.

4.115 Due to the nature of the local townscape context; separation distances; nature of the July 2020 amended proposed development; and, the very limited contribution made by setting to the particular local heritage significance of this building there would be no impact on the local heritage significance of the public house or the positive elements of setting (View 26). Accordingly, the local heritage significance of this non-designated heritage asset would be sustained; consistent with the previously assessed impacts of the May 2020 consented scheme.

***Hawley Infant School, Buck Street***

4.116 The building is principally of interest as the attractive remnant of a much larger school site. It is built in the typically well-considered Queen Anne Revival style favoured by schools of the period, with the resultant decorative work and picturesque composition providing visual interest when seen rising above the brick boundary wall and obliquely through the gates. The setting of the school building has been subject to change with the remaining traditional townscape contributing positively to create a complex and layered context. As a result of the separation distances, disposition to the application site and the nature of interposing built form, the July 2020 amended proposed development would have no impact upon an appreciation of the particular local heritage significance of this remnant of a traditional school complex or any relationships to remnants of its traditional 19<sup>th</sup> townscape context of which it forms a part. In those terms, the July 2020 amended proposed development would sustain the particular heritage significance of this locally listed building; consistent with the previously assessed impacts of the May 2020 consented scheme.

***The Buck's Head, No.202 Camden High Street***

4.117 This is a mid-19<sup>th</sup> public house located on a prominent corner site on the busy pedestrian north-south route of Camden High Street. The pub frontage is highly articulated and reminiscent of the 'house style' of the Truman brewery. The building forms an integral part of the distinctive local townscape of Camden High Street, with a



shared materiality, character, grain and scale whilst the use complements that of the diverse mix within the local area.

- 4.118 As a result of the separation distances; interposing built form and enclosure to this part of Camden High Street, the July 2020 amended proposed development would have no impact upon an appreciation of the particular local heritage significance of this public house or any relationships to remnants of the bustling 19<sup>th</sup> townscape context of Camden Town and its bustling urban character, which contribute positively to its particular heritage significance (View A7). In those terms, the July 2020 amended proposed development would sustain the particular heritage significance of this locally listed building; consistent with the previously assessed impacts of the May 2020 consented scheme.

***The Elephant's Head, No.224 Camden High Street***

- 4.119 This is a mid-19<sup>th</sup> public house located on a prominent corner site on the busy pedestrian north-south route of Camden High Street. It is a handsome example of a traditional public house with an attractive tiled frontage, which extends along the return to Hawley Crescent. Above, the property is a typical and attractive example of mid-19<sup>th</sup> century terraced architecture with decorative enrichment emphasising the building's townscape role in terminating the contemporaneous terrace of which it forms a part. The building forms an integral part of the distinctive local townscape of Camden High Street and, in this regard, setting contributes positively to the building's particular heritage significance (Views A7 and A8). Beyond the distinctive townscape of Camden High Street, there is an emerging and more variable townscape character consisting of new contemporary buildings of a varied character and materiality, visible in both directions along Jamestown Road and Crawley Crescent.

- 4.120 As a result of the separation distances; interposing built form and enclosure to this part of Camden High Street, the July 2020 amended proposed development would have no impact upon an appreciation of the particular local heritage significance of this public house or any relationships to remnants of the bustling 19<sup>th</sup> townscape context of Camden Town and its bustling urban character, which contribute positively to its particular heritage significance. In those terms, the July 2020 amended proposed development would sustain the particular heritage significance of this locally listed building; consistent with the previously assessed impacts of the May 2020 consented scheme.

***The Oxford Arms, No.265 Camden High Street***

- 4.121 This is a late-19<sup>th</sup> public house located on a prominent corner site on the busy pedestrian north-south route of Camden High Street. It has a highly eclectic composition in a nominal Queen Anne Revival style, reflecting the diversity and flexibility of late Victorian architecture, with richly detailed and modulated façades. The height, form and decoration of the public house terminates the attached terrace and defines an important townscape junction. The building forms an integral part of the distinctive local townscape of Camden High Street, with a shared materiality, character, grain and scale whilst the use complements that of the diverse mix within the local area. Beyond the distinctive townscape of Camden High Street, there is an emerging and more variable townscape character consisting of new contemporary

buildings of a varied character and materiality, visible in both directions along Jamestown Road and Crawley Crescent.

- 4.122 As a result of the separation distances; interposing built form and enclosure to this part of Camden High Street, the July 2020 amended proposed development would have no impact upon an appreciation of the particular local heritage significance of this public house or any relationships to remnants of the bustling 19<sup>th</sup> century townscape context of Camden Town and its bustling urban character, which contribute positively to its particular heritage significance (Views A7 and A10). In those terms, the July 2020 amended proposed development would sustain the particular heritage significance of this locally listed building; consistent with the previously assessed impacts of the May 2020 consented scheme.

***No.31 Jamestown Road***

- 4.123 This is a late 19<sup>th</sup> century public house arranged around a highly original composition on a corner site. When considered as a whole the building has a strong vertical emphasis, which contrasts with the long, low horizontal form that tends to characterise the building's context. The originality of the composition is enhanced by the quality of the red brickwork. As a result of the extent of change within the building's setting from the mid-20<sup>th</sup> century onwards, there are established contrasts in scale, materiality and character.

- 4.124 As a result of the interposing built form and enclosure to this part of Jamestown Road, the extent of mid-late 20<sup>th</sup> century redevelopment and subsequent limited contribution made by setting to significance in this instance, the July 2020 amended proposed development would have no impact upon an appreciation of the local heritage significance of this public house. In particular, the views from the east where the striking form and composition is best appreciated would not be affected by the July 2020 amended proposed development. In those terms, the July 2020 amended proposed development would sustain the particular heritage significance of this locally listed building; consistent with the previously assessed impacts of the May 2020 consented scheme.

***No.57 A/B/C/D Jamestown Road***

- 4.125 This collection of buildings dates from the mid-19<sup>th</sup> to early 20<sup>th</sup> century and is typical and attractive examples of modest industrial structures. The buildings are principally of historic interest as remnants of the locally important piano-making industry. The remaining elements of the traditional townscape are of a consistent scale and materiality and help to illustrate the process of the area's historic development. As backland industrial buildings they are recessive elements within the townscape, with the most significant relationship being with the other nearby contemporaneous industrial buildings, notably the Collard and Collard piano-making factory with which they shared a similar historic function. The large tree within the courtyard emphasises the townscape value of the group and their disposition.

- 4.126 Due to the scale of interposing built form located on the south side of Jamestown Road and the nature of the July 2020 amended proposed development there would be no impact on the particular heritage significance of this industrial group. Moreover, there would be no change in the important interrelationships between the individual

buildings or those elements of setting, which contribute positively to their local heritage significance. In those terms, the July 2020 amended proposed development would sustain the particular heritage significance of these locally listed buildings; consistent with the previously assessed impacts of the May 2020 consented scheme.

***Nos.61-85 Jamestown Road***

4.127 This group of locally listed building consists of a truncated terrace of apparently mid-18<sup>th</sup> century date. The terrace is, however, not complete or intact. Overall, the properties are of architectural interest for their townscape value as a consistent and attractive terrace. The properties are of historic interest as a legacy of the area's development, the changing fortunes of the area and as a representative example of modest terraced housing. The most significant setting relationship is with the remaining terraced housing, located nearby on Oval Road, of which the assets form part of a consistent townscape group of shared materiality, scale, character and historic development. This group value enhances the individual significance of the heritage assets.

4.128 Due to the scale of interposing built form located on the south side of Jamestown Road, the scale and character of more recent development in the local context and the separating distance to the application site there would be no impact on the particular heritage significance of traditional terrace arising from the July 2020 amended proposed development. Moreover, there would be no harmful change in the important interrelationships between the individual buildings or those elements of setting, which contribute positively to their local heritage significance. In those terms, the July 2020 amended proposed development would sustain the particular heritage significance of these locally listed buildings.

***Nos.14-18 Oval Road***

4.129 These locally listed buildings consist of a short, mid-19<sup>th</sup> century terrace constructed of stock brick, are a single bay wide, with stucco work detailing and decorative metal balustrades to the first floor windows. The vertical emphasis, reinforced by the recessed channel on party wall lines, creates a tight grain and rhythm. The terrace is, however, not intact, with inappropriate replacement windows to all of the properties and replacement of the parapet cornice, which harms their architectural value. Overall, the properties are of architectural interest for their townscape value as a consistent and attractive terrace. The most significant setting relationship is with the remaining terraced housing, located nearby on Jamestown Road, of which the assets form part of a consistent townscape group of shared materiality, scale, character and historic development.

4.130 The introduction of new built form on the MS Parcel would be a significant change from the existing context. This new built form would be experienced as part of the varied townscape context in which the terraced properties are located, which includes established contrasts in scale, age, form and character, which marks the transition between the more consistent domestic townscape to the south and the industrial legacy further to the north along the canal (Views 36 and 37). The separation distances and the layering of new buildings behind the existing late 20<sup>th</sup> century buildings in Gilbeys Yard would ensure that the July 2020 amended proposed development would not undermine an appreciation of the buildings' architectural character and quality or

its group value with Nos.61-85 Jamestown Road, given their relative disposition and alignments. Accordingly, notwithstanding the proposed minor increase in the heights of Blocks A, B, C and F, the July 2020 amended proposed development would sustain the particular heritage significance of these locally listed buildings; consistent with the previously assessed impacts of the May 2020 consented scheme.

**No.12 Oval Road**

4.131 This is an early 20<sup>th</sup> century warehouse built of red/brown brick with the principal interest derived from the street elevation with its two flanking recessed window bays to a central double bay with restrained decorative detail in the form tiled panels. The building is a typical example of industrial architecture of the period. The setting of the building is varied, reflecting its location at the transition between the more domestic context of Gloucester Crescent and Oval Road and the later industrial development aligned with the railway and towards the northern end of Oval Road. The industrial context makes the strongest contribution to significance by virtue of their shared origins, function and role in the development of the area.

4.132 The introduction of new built form on the MS Parcel would be a significant change from the existing context. This new built form would be experienced as part of the varied townscape context in which the building is located, which includes established contrasts in scale, age, form and character. The separation distances and the layering of new buildings behind the existing late 20<sup>th</sup> century buildings in Gilbeys Yard would ensure that the July 2020 amended proposed development would not undermine an appreciation of the building's architectural character, its historic function and relationship with the nearby industrial context of which it forms a part (Views 37 and 38). Accordingly, notwithstanding the proposed minor increase in the heights of Blocks A, B, C and F, the July 2020 amended proposed development would sustain the particular heritage significance of these locally listed buildings; consistent with the previously assessed impacts of the May 2020 consented scheme.

**Nos.2, 10 & 11 Regal Lane**

4.133 These properties are a group of three bespoke houses dating to 1961-2 and 1964 respectively, on a backland site, formerly occupied by garages. The strongly modernist character of these buildings integrates with the surrounding context through the use of reclaimed stock brick to reflect the texture, colour and tonality of the prevalent local building materials. The associations with John Winter are of some minor historic interest. The locally listed buildings are not readily visible from the public realm and the resultant secluded character, associated with the previous use of the site as gardens and later garages, contributes positively to their significance. Due to the enclosed character of the backland site in which the buildings are located, the nature of surrounding built form and mature trees and the separating distance to the application site, there would be no impact on the particular heritage significance of these buildings. Moreover, there would be no change in the important interrelationships between the individual buildings or those elements of setting, which contribute positively to their local heritage significance. In those terms, the July 2020 amended proposed development would sustain the particular heritage significance of these locally listed buildings; consistent with the previously assessed impacts of the May 2020 consented scheme.

### ***Nos.1 & 2 Bridge Approach***

4.134 These buildings are attractive, albeit typical, examples of symmetrical mid-19<sup>th</sup> century Italianate villas. Historic interest is secondary to the property's architectural value and is derived from their role in illustrating the rapid urbanisation of the area during the 19<sup>th</sup> century. The properties are situated on rising ground, which gives them an elevated position in the local townscape and means that they terminate western views along Regent's Park Road. The townscape character is varied with elements of the 19<sup>th</sup> century townscape on Adelaide Road and to the south of the railway lines in Primrose Hill amplifying the significance of the buildings through shared character, materiality, scale and historic origins. The railway tracks are a well-established element of the area and reflect the historic integration of transport infrastructure and residential development during the 19<sup>th</sup> century.

4.135 As a result of the topography and relative disposition of the application site to these buildings it is likely that the July 2020 amended proposed development would only be visible from the upper storeys of the buildings. The new built form would be experienced as part of the varied urban context, including range of 20<sup>th</sup> century (and later) buildings in the foreground, and would be consistent with this townscape character. Any views from the dormer windows in the attic, seemingly later insertions out of keeping for a property of this date, would have no impact on its local heritage significance. Moreover, there would be no impact on positive elements of setting, such as the termination of views along Regent's Park Road, relationship to the 19<sup>th</sup> century domestic context to the south and north; or their relationship with the railway. Accordingly, in those terms, the July 2020 amended proposed development would sustain the particular heritage significance of these locally listed buildings; consistent with the previously assessed impacts of the May 2020 consented scheme.

### ***Nos.23-49 Adelaide Road***

4.136 These locally listed buildings consist of a group of 14, attractive, albeit typical, examples of symmetrical mid-19<sup>th</sup> century Italianate villas. A number of villas have been connected via recessive links, which has eroded their legibility as suburban villas. Overall, the group provides a substantial and attractive southern edge to this wide street, and although some individual houses retain less of their original detailing, they contribute together to provide a high quality and consistent townscape. The properties are set within historic plots, with the front gardens/yards often containing mature trees and soft landscaping, which illustrate their original suburban character. Due to the scale of interposing built form and mature trees together with the separating distance to the application site, there would be no impact on the particular heritage significance of these locally listed buildings arising from the June 2002 Amended Proposed Development. Moreover, there would be no change in the important interrelationships between the individual buildings or those elements of setting, which contribute positively to their local heritage significance. In those terms, the July 2020 amended proposed development would sustain the particular heritage significance of these locally listed buildings; consistent with the previously assessed impacts of the May 2020 consented scheme.

### ***No.2 Haverstock Hill and Nos.45-47 Crogsland Road***

4.137 The locally listed buildings form part of a consistent townscape group. The most significant element is the 19<sup>th</sup> century public house located on the corner of Haverstock

Hill and Crogsland Road, opposite the junction of Regent's Park Road and Adelaide Road. The public house is connected to a short stretch of heavily altered terraced housing on Crogsland Street. The architectural integrity of these terraces has been significantly eroded and they are now of limited comparative interest. The townscape context of the buildings has been subject to significant change. The remaining 19<sup>th</sup> century elements contribute positively by virtue of their shared age and materiality but are located within a fragmentary context, are now isolated elements in an inconsistent, predominantly 20<sup>th</sup> century townscape. Overall, setting makes a limited contribution to the significance of these buildings.

- 4.138 Due to the relative disposition of the application site to this group and the degree of enclosure, the impact of the July 2020 amended proposed development is likely to be restricted to No.2 Haverstock Hill, with no intervisibility with Nos.45-47 Crogsland Road, the significance of which would be sustained. The development of the MS Parcel (principally Block A) would be new, high-quality background elements in the varied townscape context, of No.2 Haverstock Hill, and would be consistent with its setting in that regard (View 21). Due to the separation distances between No.2 Haverstock Hill and the PFS parcel, the July 2020 amended proposed development would be a recessive townscape element, experienced in the context of the existing Nos.100, 100a and 100b Chalk Farm Road as well as the consented proposals. In overall terms, there would be no impact on an understanding of the architectural interest of No.2 Haverstock Hill or its relationship with any elements of setting that contribute positively to its local heritage significance, best appreciated in the northern and southern kinetic experience moving along Chalk Farm Road, where its traditional corner PH form is most readily understood. Accordingly, its significance would be sustained by the July 2020 amended proposed development; consistent with the previously assessed impacts of the May 2020 consented scheme.

***Nos.1-11 Crogsland Road***

- 4.139 These locally listed buildings consist of a short, tall terrace of mid-19<sup>th</sup> century houses. They are high-quality, albeit typical, examples of late Georgian/early Victorian domestic architecture. Historic interest is secondary to the properties' architectural value and is derived from their role in illustrating the rapid urbanisation of the area during the 19<sup>th</sup> century. The setting of the terrace has been extensively altered and it is now only the relationship with the listed Georgian terrace at Nos.131-149 Prince of Wales Road, which contributes positively to their local heritage significance. The orientation of the locally listed buildings and their disposition relative to the application site, considered together with the nature of interposing built form and landscaping means that there would be no impact on an understanding of their particular heritage significance arising from the July 2020 amended proposed development. In addition, there would be no change or impact upon the contribution made by the remaining positive elements of setting, notably Nos. 131-149 Prince of Wales Road located to the north, to the particular local heritage significance of these terraced properties. Accordingly, their local heritage significance would be sustained by the July 2020 amended proposed development; consistent with the previously assessed impacts of the May 2020 consented scheme.

***Nos.4-8 (even) and Nos.7-11 (odd) Belmont Street***

4.140 These buildings are attractive examples of mid-19<sup>th</sup> century domestic architecture with their particular aesthetic interest derived from their townscape role in forming the southern end of this 'square'. Historic interest is secondary to the properties' architectural value and is derived from their role in illustrating the former townscape composition of which they form a part; illustrating the rapid urbanisation of the area during the 19<sup>th</sup> century. The setting of these buildings has been extensively compromised as a result of extensive mid-late 20<sup>th</sup> century development, which is of a significantly contrasting scale and character. Whilst part of the original townscape/street pattern remains legible this is significantly compromised.

4.141 The relative disposition of the application site to these locally listed buildings, the orientation of the local street pattern and the nature of interposing built form, means that there would be no intervisibility with the July 2020 amended proposed development. Accordingly, there would be no impact on an appreciation of their local architectural or historic significance, particularly with regard to their relationship to the remaining elements of historic street pattern. In addition, there would be no impact on the relationships between these heritage assets and the remaining elements of the 19<sup>th</sup> century townscape context on Belmont Street, which remain in the local context, due to the linear alignment of the street, relative disposition to the application site and interposing built form. Accordingly, the particular heritage significance of these locally listed buildings would be sustained by the July 2020 amended proposed development; consistent with the previously assessed impacts of the May 2020 consented scheme.

***Former Chappell's Piano Factory, No.10a Belmont Street***

4.142 The architectural interest of this building is derived from its scale and external character of robust, masculine brickwork and extensive glazing, which illustrate the particular requirements of industrial and manufacturing processes. The overall composition is assured, elegant and representative of the pride and wealth invested into 19<sup>th</sup> century industrial buildings. The recent roof top addition is a complementary, contrasting addition to the building. The building is a rare example of a typology, which provides a tangible connection to Camden's piano making heritage, and is, accordingly, of historic interest. The setting of this building has been compromised as a result of extensive mid-late 20<sup>th</sup> century development, which is of a significantly different character and quality. Whilst part of the original townscape/street pattern remains legible this is significantly compromised.

4.143 This building is locally prominent as a result of its scale, massing and form relative to the prevailing scale of built form of the townscape context to the east of Chalk Farm Road. The July 2020 amended proposed development, by virtue of the interposing built form and relative disposition to the locally listed building would not impair the legibility of this local landmark status or compete with its architectural quality in understanding its former industrial use, notwithstanding the increased heights of Blocks A, B, C and F. Whilst there would be high-level views of the July 2020 amended proposed development from the upper floors of the locally listed building in gaps between interposing buildings to the west and above the existing townscape context, these would not interfere with an understanding of any associations or visual links with the varied townscape that contribute positively to its local heritage significance. In addition, there would be no impact on the relationships between these heritage assets

and the remaining elements of the 19<sup>th</sup> century townscape context on Belmont Street as a result of the degree of enclosure, relative disposition to the application site and interposing built form. Accordingly, the particular heritage significance of this locally listed building would be sustained by the July 2020 amended proposed development; consistent with the previously assessed impacts of the May 2020 consented scheme.

***Nos.10-14 (even) Belmont Street***

4.144 These locally listed buildings consist of a short group of three houses, which are the southern fragment of a larger mid-19<sup>th</sup> century terrace. They are attractive examples of the typical restrained and elegant architectural character of urban townhouses of the period. Historic interest is secondary to the properties' architectural value and is derived from their role in illustrating the former townscape composition of which they form a part; illustrating the rapid urbanisation of the area during the 19<sup>th</sup> century. The setting of these buildings has been extensively compromised as a result of mid-late 20<sup>th</sup> century development, which is of a significantly contrasting scale and character. Whilst part of the original townscape/street pattern remains legible this is significantly compromised.

4.145 As a consequence of the interposing built form, the nature of the July 2020 amended proposed development and having regard to the limited contribution made by setting to the particular local heritage significance of these buildings, there would be no impact on an understanding of the architectural and historic significance of these locally listed buildings. The particular heritage significance of these locally listed buildings is best appreciated from within Belmont Street, in the context of the remaining elements of historic street pattern and traditional townscape, which would not be affected by the July 2020 amended proposed development, notwithstanding the increase in height of Blocks A, B, C and F. Accordingly, the local heritage significance of these buildings would be sustained by the July 2020 amended proposed development; consistent with the previously assessed impacts of the May 2020 consented scheme.

**Summary of Heritage Impact of July 2020 amended proposed development**

4.146 As explained in the Planning Statement Addendum, prepared by Turley, the July 2020 Proposed Amended Development is submitted in the context of acute housing need in London and Camden. The overall approach to the July 2020 Proposed Amended Development is to increase the delivery of new homes whilst maintaining and building upon the design quality and sense of place of the May 2020 consented scheme. The July 2020 proposed amendments are consistent with both the May 2020 consented scheme and with adopted and emerging policy, including in relation to built heritage; housing mix; affordable housing quantum and mix; commercial floorspace, including affordable workspace; architectural quality; and, the quality of homes.

4.147 Like the May 2020 consented scheme, the July 2020 amended proposed development has been conceived on the basis of a detailed understanding of the constraints of the application site, including the particular significance of heritage assets within the study area; the remarkable opportunity to revitalise this part of Camden; and, to reintegrate the application site into the wider townscape context. The impacts of the July 2020 amended proposed development, both beneficial and harmful, are derived directly from this ambition to deliver a transformational scheme. As such, they are interrelated



and the overall impacts of the July 2020 amended proposed development upon the significance of the relevant built heritage assets must be considered in their entirety, having regard to the substantial public benefits (widely defined for the purposes of the NPPF – see later in this Section), which would be delivered.

- 4.148 The Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty upon the decision maker in determining applications for planning permission to have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses. As noted in **Section 2** of this Addendum and Appendix 6 of the Heritage Statement (June 2017), it has been confirmed that decision-makers should give considerable importance and weight to the desirability of preserving a listed building and its setting. It is also a duty upon the decision maker in determining applications for planning permission within conservation areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. It has also been confirmed that considerable importance and weight to the desirability of preserving or enhancing the character or appearance of a conservation area. The setting of a conservation area is not enshrined in the legislation and does not attract the weight of statutory protection.
- 4.149 There are no statutory duties relating to the protection of the special historic interest or setting of Registered Parks and Gardens.
- 4.150 In overall terms, consistent with the assessment of the impacts of the May 2020 consented scheme, the July 2020 amended proposed development sustains, and, to a degree, enhances the particular significance of a wide range of the heritage assets identified within the study area, including the contributions made by setting to that significance. In those terms, the July 2020 amended proposed development is consistent with the relevant statutory duties of the 1990 Act and the requirements of the NPPF.
- 4.151 There are elements of the July 2020 amended proposed development that would have adverse impacts on the significance of a small number of heritage assets located within the study area, consistent with the impact assessment of the May 2020 consented scheme:
- The Roundhouse (Grade II\* listed building);
  - The Interchange Building (Grade II listed building);
  - Nos.1-15 Prince Albert Road (Grade II listed buildings);
  - Primrose Hill Infants School (Grade II listed building);
  - The Engineer PH (Grade II listed building);
  - Primrose Hill Conservation Area;
  - Harmood Conservation Area; and
  - Regent’s Park (Grade I Park and Garden of Special Historic Interest).

- 4.152 Whilst that adverse impact would be amplified in the case of the Interchange Building, The Roundhouse and the Primrose Hill Conservation Area, by virtue of the minor increases to the heights of Blocks A, B, C and F, the level of perceived heritage harm in all cases remains less than substantial for the purposes of the NPPF and ‘calibrated’ as comparatively modest in all instances.
- 4.153 The Planning Statement Addendum and Design and Access Addendum provide the clear and convincing justification for that heritage harm (paragraph 194 of the NPPF).
- 4.154 The identified less than substantial harm has to be weighed in the balance against the public benefits, which include heritage benefits, as required by paragraph 196 of the NPPF and must be accorded great weight and importance (paragraph 193 of the NPPF).
- 4.155 In this instance, the overarching public benefits are directly linked to the redevelopment of this important but underutilised Town Centre site and the creation of a high-quality new neighbourhood. These substantive public benefits, and the overall planning balance, are identified in the Planning Statement Addendum prepared by Turley.

## 5. Summary and Conclusions

5.1 This Heritage Statement Addendum has been prepared by Turley Heritage on behalf of the Applicant, to assess the built heritage impacts of the July 2020 s73 application<sup>10</sup> for the Camden Goods Yard project. The Design and Access Statement Addendum provides the full description of development.

5.2 The July 2020 s73 application comprises the proposed amendments (collectively referred to as the 'July 2020 proposed amendments') in respect of Blocks A, B, C and F of the MS Parcel, identified in detail within the Design and Access Statement Addendum and identified here for ease of reference:

- Deepening an area of 300 m<sup>2</sup> within the basement footprint by approximately 4 m to create a two-level basement under Block A.
- Concierge facilities will be moved from Block E to Block A.
- Updated basement and lower ground floor layout to account for the following:
  - Relocation of plant and updated car parking layout.
  - Introduction of a cinema, pool, gym and associated facilities beneath Block A.
  - Repositioning of energy centre within the basement, to shift further east beneath Block A.
- Introduction of one to two additional floors to Blocks A-C and F as follows (excluding plant enclosures) to accommodate an additional 71 homes:
  - Block A1 to increase from 14 to 15 floors (approximately 0.91m increase from 84.170m AOD to 85.075m AOD).
  - Block A2 to increase from 11 to 12 floors (approximately 1.58m increase from 74.050m AOD to 75.625m AOD).
  - Block B1 to increase from 7 to 8 floors (approximately 2.70m increase from 62.075m AOD to top of proposed urban farm to 64.775m AOD to top of proposed urban farm).
  - Block B2 to increase from 6 to 7 floors (approximately 6.13m increase from 55.950m AOD to 62.075m AOD).
  - Block C to increase from 8 to 10 floors (approximately 4.65m from 64.125m AOD to 68.775m AOD); and 10 to 11 floors to the tallest part of the block set back from the application site boundary (approximately 1 m from 71.250m AOD to 72.250m AOD).

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<sup>10</sup> Application ref.: 2017/3847/P

- Block F2 to increase from 9 to 11 floors (approximately 4.90m increase from 67.315m AOD to 72.210m AOD, approximately 6.56m increase to 73.875m AOD when including the proposed new plant enclosure).
- Decrease of 717 m<sup>2</sup> GIA in the overall provision of commercial space from 26,904m<sup>2</sup> to 26,187m<sup>2</sup> GIA, within increases in the provision of retail, office, affordable workspace, and urban farm spaces, and decreases in the provision of supermarket (A1) and workspace.
- Reduction in a total of 47 car parking spaces as follows:
  - Foodstore to decrease by 50 car parking spaces from 300 to 250 car parking spaces; and
  - Residential to increase by three car parking spaces from 20 to 23 car parking spaces.
- Increase of 142 residential and 21 commercial long stay cycle parking spaces through the following changes to Blocks A-C and F;
  - Block A to increase from 148 to 173 residential cycle spaces (increase in 25 cycle spaces) and from 12 to 13 commercial cycle spaces (increase in 1 cycle space);
  - Block B to increase from 218 to 288 residential cycle spaces (increase in 70 cycle spaces) and from 39 to 43 commercial cycle spaces (increase in 4 cycle spaces);
  - Block C to increase from 132 to 157 residential cycle spaces (increase in 25 cycle spaces) and from 8 to 22 commercial cycle spaces (increase in 14 cycle spaces); and
  - Block F to increase from 246 to 268 residential cycles spaces (increase in 22 cycle spaces) and from 12 to 14 commercial cycle spaces (increase in 2 cycle spaces).
- Increase of 18 visitor short stay spaces for both residential and non-residential elements across the main site and PFS in communal areas, from 80 to 98 spaces.
- Increase in private amenity space from 3,209m<sup>2</sup> to 3,436m<sup>2</sup>.
- Increase of 1,031 m<sup>2</sup> in the total area of communal amenity, play space and landscaping through the following:
  - Civic space to increase from 6,155m<sup>2</sup> to 7,481m<sup>2</sup>.
  - Green amenity space to decrease from 3,490m<sup>2</sup> to 2,947m<sup>2</sup>.
  - Play Space to increase from 1,115m<sup>2</sup> to 1,265m<sup>2</sup>.
  - Food growing to increase from 463m<sup>2</sup> to 561m<sup>2</sup>.

- Minor amendments to elevational treatments, including the additional height and some relocations of windows, the removal of all glass balustrades and timber cladding in line with changes to Part B (Fire) of the building regulations and replacement with open vertical metal bars and timber with folded metal cladding, and the use of lighter brick for Block B and F courtyard elevations to enhance daylight of the courtyard and homes facing into it.
  - Update of demolition and construction programme with the year of opening changing from Q4 2023 to Q4 2027.
- 5.3 The May 2020 consented scheme, as amended by the July 2020 s73 application, is hereafter referred to as the 'July 2020 amended proposed development'.
- 5.4 There are no proposed amendments to the appearance, height and massing of the remaining blocks (E1, E2 and D) of the MS Parcel or the PFS Parcel as established by the May 2020 consented scheme, such as the ventilation, access and servicing, which require assessment as part of this report.
- 5.5 There are minimal changes to the authorised elevations of the May 2020 consented scheme, the most significant being the removal of all glass balustrades and timber cladding due to the changes to Part B (Fire) of the Building Regulations; these balustrades are all replaced with open vertical metal bars as per the bay studies and timber with folded metal cladding. The authorised brick texture and colour remains unchanged, accept for the Block B and F courtyard elevations, where a lighter brick is proposed to enhance the daylight of the courtyard space and the homes facing into the courtyard. These are not matters that would materially change the previously assessed heritage impacts of the May 2020 consented scheme.
- 5.6 Accordingly, it is only the amendments to the proposed heights of Blocks A1, A2, B, C and F2 and changes to the detailed design of the proposed landscaping that have potential implications for impacts on the significance of the relevant built heritage assets. These amendments have been considered in this Addendum in the context of assessing the impacts of the July 2020 amended proposed development as a whole. This Addendum uses the Heritage Statement (June 2017) and Supplementary Comment: Impact of Proposed Development on Regent's Park (October 2017) as a framework in assessing the impacts of the July 2020 amended proposed development.
- 5.7 This Addendum report is a Technical Appendix to the July 2020 EIL and informs its findings. Accordingly, these two reports should be read in conjunction with each other. The Heritage Statement Addendum should also be read in conjunction with the following:
- June 2017 Environmental Statement (ES) Volume 2B Heritage Assessment (including Heritage Statement) that accompanied the 2017 full planning application;
  - Supplementary Comment: Impact of Proposed Development on Regent's Park (October 2017); and

- January 2020 Environmental Implications Letter (EIL) that accompanied the January 202 S73 application, which concluded no change to the conclusions of the 2017 ES in respect of Heritage.
- 5.8 The accurate visual representations (AVRs) contained within Townscape and Visual Impact Assessment Addendum: Updated Verified Views Appendix of the July 2020 EIL have informed the assessment in this report.
- 5.9 As noted earlier in this Section, the built heritage impacts of the July 2020 amended proposed development has been assessed in its entirety in this Heritage Statement Addendum, having regard to the previously assessed impacts of the May 2020 consented scheme. For ease of reference, however, where there are no proposed amendments to previously consented elements associated impacts assessed in the Heritage Statement (June 2017), Supplementary Comment: Impact of Proposed Development on Regent's Park (October 2017) and January 2020 EIL, then such elements have not been specifically considered as part of this report, to allow for proportionate reporting.
- 5.10 The relevant legislation relating to built heritage matters, as referred to within the Heritage Statement (June 2017) and the Supplementary Comment: Impact of Proposed Development on Regent's Park (October 2017) remain extant, unchanged and valid. This includes s66 and s72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The up to date national planning policy and Development Plan context have been identified at **Section 2** of this Addendum, alongside any updated best practice guidance/advice. Together, this legislative and planning policy framework has informed the impact assessment contained at **Section 4** of this report.
- 5.11 At **Section 3**, it is confirmed that there have been no changes to the built heritage baseline defined in the Heritage Statement (June 2017) that require assessment as part of this Addendum.
- 5.12 The impact assessment in **Section 4** of this Addendum, confirms that in overall terms, consistent with the assessment of the impacts of the May 2020 consented scheme, the July 2020 amended proposed development sustains, and, to a degree, enhances the particular significance of a wide range of the heritage assets identified within the study area, including the contributions made by setting to that significance. In those terms, the July 2020 amended proposed development is consistent with the relevant statutory duties of the 1990 Act and the requirements of the NPPF.
- 5.13 There are elements of the July 2020 amended proposed development that would have adverse impacts on the significance of a small number of heritage assets located within the study area, consistent with the impact assessment of the May 2020 consented scheme:
  - The Roundhouse (Grade II\* listed building);
  - The Interchange Building (Grade II listed building);
  - Nos.1-15 Prince Albert Road (Grade II listed buildings);

- Primrose Hill Infants School (Grade II listed building);
- The Engineer PH (Grade II listed building);
- Primrose Hill Conservation Area;
- Harmood Conservation Area; and
- Regent's Park (Grade I Park and Garden of Special Historic Interest).

- 5.14 Whilst that adverse impact would be amplified in the case of the Interchange Building, The Roundhouse and the Primrose Hill Conservation Area, by virtue of the minor increases to the heights of Blocks A, B, C and F, the level of perceived heritage harm in all cases remains less than substantial for the purposes of the NPPF and 'calibrated' as comparatively modest in all instances.
- 5.15 The Planning Statement Addendum and Design and Access Addendum provide the clear and convincing justification for that heritage harm (paragraph 194 of the NPPF).
- 5.16 The identified less than substantial harm has to be weighed in the balance against the public benefits, which include heritage benefits, as required by paragraph 196 of the NPPF and must be accorded great weight and importance (paragraph 193 of the NPPF).
- 5.17 In this instance, the overarching public benefits are directly linked to the redevelopment of this important but underutilised Town Centre site and the creation of a high-quality new neighbourhood. These substantive public benefits, and the overall planning balance, are identified in the Planning Statement Addendum prepared by Turley.

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