

17-37 WILLIAM ROAD





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01

Introduction

- 1.1 This volume provides an assessment of the potential townscape, visual and built heritage effects of the proposals for 17-37 William Road (the ‘Proposed Development’), (‘the Site’) designed by architect, Morris + Company for Euston One Limited (‘the Applicant’). The proposed redevelopment includes demolition of Nos.35-37 and redevelopment to provide a student accommodation-led scheme, comprising a 15-storey building with basement and retention of Nos.17-33 with provision of affordable workspace at ground floor level, delivered alongside improvements to the existing ground floor façade, providing active frontages along William Road.
- 1.2 This volume provides an assessment of the likely effects of the Proposed Development on the surrounding townscape quality and character and composition of designated views and representative local townscape views, and on the settings of designated heritage assets close to the Site. The assessment has been undertaken by the Tavernor Consultancy Limited (‘Tavernor Consultancy’) and is based on architectural drawings by Morris and Company which are being submitted as part of the planning application, and verified images by Cityscape, which are included within this report. This document should be read in conjunction with the Design and Access Statement (DAS) produced Morris and Company and the full planning application documentation.



02

Assessment Methodology

Introduction

- 2.1 Townscape, built heritage and visual assessments are separate, although linked, procedures. The townscape and built heritage baseline analysis contributes to the scope of the baseline for the visual assessment. The visual assessment of change to the content and character of views in turn contributes to the understanding of potential impacts on townscape and built heritage assets. Although the assessment of townscape, heritage and views is inter-related, each topic is distinguished in this report. The assessment of townscape effects has considered how the Proposed Development will affect the elements that make up the townscape, the aesthetic and perceptual aspects of the townscape and its distinctive character. The visual assessment has considered the composition and character of views, including both protected views and representative views likely to be experienced by people within the townscape. The effects on built heritage assets have been considered in proportion to the value of each heritage asset and the degree and nature of the effects on their heritage significance, or the ability to appreciate that significance.
- 2.2 This assessment has taken into account the nature of the existing physical fabric of the area, the settings of designated heritage assets in the vicinity of the Site, the appropriateness of the form and massing of the Proposed Development and the architectural character and quality of the design. Structured, informed and reasoned professional judgement has been used to take account of quantitative and qualitative factors. This is widely accepted as best practice and has been based on an analysis of desk research and field assessment. It is recognised that the character of London is one of contrasts, of historic and modern buildings, and that modern buildings of high design quality do not necessarily or by definition harm the settings of heritage assets or the character of historic townscape or views.

Defining the Study Area

- 2.3 In accordance with standard practice, the study area has been defined in relation to the scale and massing of the Proposed Development and the scale, character, layout and sensitivity of the existing townscape context around the Site. Using computer modelling to determine the theoretical zone of visual influence (TZVI) of the Proposed Development, with site observation and more detailed testing in 3-d model views of potential impacts within the TZVI, a study area for each assessment topic has been defined within which effects could be expected on the identified townscape, built heritage or visual receptors. It is normal to

identify a potential study area informed by a TZVI, but especially in built-up urban environments, the actual area within which there may be potentially noticeable effects is usually much more contained. The TZVI in Appendix B, which does not include trees, shows the potential for widespread visual impacts within approximately 1.5km of the Site. More detailed testing of views in the 3-d model (including the test views modelled in Appendix A) has demonstrated that there would be potential for noticeable visual impacts within a radius of approximately 150m of the Site. Outside this close area, while development on the Site could be visible, impacts would not generally be noticeable. This has informed the extent of the study area considered to be sufficient to understand the range of likely effects of the Proposed Development for each topic. Each study area is considered to be reasonable and proportionate in relation to the anticipated effects of the Proposed Development and the sensitivity to change of its townscape, visual or built heritage context. There are some more distant areas of potential higher visibility as a result of the particular alignment of streets and open spaces, for example from Regent’s Park, Parliament Hill and Primrose Hill, which are very high in value and susceptible to change; while they are outside the core study areas, effects on them have been considered in the assessment.

Defining the Baseline Conditions

- 2.4 The baseline assessment will include an account of:
 - The history of the Site and surrounding area;
 - The character of the townscape on and around the Site;
 - The heritage significance and contribution to the appreciation of heritage significance of the settings of relevant heritage assets;
 - The existing characteristics of the agreed verified views; and
 - The sensitivity to change of the townscape, heritage assets and views, based on an understanding of their ‘value’ and ‘susceptibility’.
- 2.5 The baseline assessment of townscape character, built heritage and visual amenity is informed by an understanding of the history of the Site and its context. The baseline assessment will therefore include an account of the history of the Site and surroundings, with reference to historic maps and archival material. This study will inform the analysis of the existing character of the Site and its context, the significance of

relevant heritage assets and the character of the views.

Guidance for the Assessment of Effects

Townscape and visual assessments

2.6 The available guidance for assessing the effects of a development on townscape and views is as follows:

- Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA) (2013) (Ref 1-1) produced jointly by the Landscape Institute and the Institute of Environmental Management and Assessment;
- London View Management Framework Supplementary Planning Guidance (LVMF SPG) (2012) (Ref 1-2); and

2.7 The GLVIA (Ref 1-1) provides advice on good practice for townscape and visual assessment and, although developed for the assessment of landscape impacts, is broadly applicable to all forms of landscape (including townscape). The GLVIA states that an assessment should address potential effects on the character and distinctiveness of the landscape and effects on observers through their experience of views. The methodology employed for this assessment is based on approaches recommended in the GLVIA. It should be noted that the guidance states that its methodology is not prescriptive in that it does not provide a detailed universal methodology that can be followed in every situation (para 1.20). The assessment should be tailored to the particular circumstances in each case with an approach that is in proportion to the scale of the project that is being assessed and the nature of its potential effects. The guidance recognises that much of the assessment must rely on professional judgement (paras. 2.23-2.26). The LVMF SPG (Ref 1-2) identifies and sets out policy to protect a number of strategic views within London and provides guidance on the qualitative visual assessment of the designated views. Section 3 of the document is also applicable to the assessment of effects on undesignated views within London more generally.

Built Heritage

2.8 The available guidance for assessing the effects of a development on the settings of built heritage assets, including World Heritage Sites (WHs), is as follows:

- Historic England’s Conservation Principles, Policies and Guidance (2008) (Ref 1-3) and Conservation Principles, draft for consultation (2017) (Ref 1-3A);
- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017) (Ref 1-4), produced by Historic England; and

2.9 Historic England’s Conservation Principles (Ref 1-3 and 1-3A) provides guidance for assessing the heritage significance of heritage assets. Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Ref 1-4) advises on the management of change within the surroundings of heritage assets.

General Approach to the Assessment of Effects

2.10 This assessment considers the likely effects that result directly from the Proposed Development itself in isolation or in conjunction with other existing, pending approval and/or approved development (referred to as ‘cumulative schemes’).

2.11 Different detailed elements of methodology apply to each topic, but each assessment follows the same assessment sequence:

1. Identify the receptors;
2. For each receptor consider its value and susceptibility to change and combine those judgements to assess its **Sensitivity to Change**;
3. For each receptor consider the size and scale of the change, its geographic extent and duration, and combine those judgements to assess the **Magnitude of Impact** as the result of the Proposed Development; and
4. Combine the judgements of Sensitivity to Change of the receptor and Magnitude of Impact as a result of the Proposed Development to assess the **Scale of the Effect** and, where the scale of the effect would be minor or greater, then assess the **Nature of the Effect**.

2.12 Simple word scales are used as a means of summarising judgements at each stage of the assessment sequence described above, with clear and transparent narrative describing the reasoning for each judgment in the accompanying text.

Assessment Criteria

2.13 Sensitivity to change is summarised using the broad categories in Table 2.1.

Table 2.1: Sensitivity to Change

Very low	The receptor can accommodate considerable change without materially altering its character, heritage significance or visual amenity
Low	The receptor can accommodate change without materially altering its character, heritage significance or visual amenity
Medium	The receptor has some ability to accommodate change without altering its character, heritage significance or visual amenity
High	The receptor has limited ability to accommodate change without altering its character, heritage significance or visual amenity
Very high	The receptor has almost no ability to accommodate change without altering its character, heritage significance or visual amenity

2.14 The magnitude of impact is summarised using the broad categories in Table 2.2.

Table 2.2: Magnitude of Impact

None	No change.
Negligible	A change that would be barely perceptible.
Low	A slight change that is clearly visible but may not be immediately noticeable.
Medium	A clear change that would be immediately noticeable but would not dominate the composition of a view, townscape character or the ability to appreciate the heritage significance of a designated heritage asset.
High	An immediately apparent change that would become the focal point of a view or an area of townscape, or make an immediately apparent considerable change to the ability to appreciate the heritage significance of a designated heritage asset.

2.15 The scale of effect for townscape character, views and built heritage assets is summarised in a series of broad categories as set out in Table 2.3A. Effects judged to be minor, moderate, major or very major, are further categorised as beneficial, neutral or adverse as set out in Table 2.3B. ‘Very major’ effects are only applicable where a receptor is of ‘very high’ value with a ‘very high’ sensitivity to change.

Table 2.3A: Scale of Effect

Magnitude of Impact					
Sensitivity to change	None	Negligible	Low	Medium	High
Very High	No effect	Minor	Moderate	Major	Very major
High	No effect	Negligible	Minor	Major	Major
Medium	No effect	Negligible	Minor	Moderate	Major
Low	No effect	Negligible	Negligible	Minor	Moderate
Very Low	No effect	Negligible	Negligible	Negligible	Minor

Table 2.3B: Nature of Effect

Adverse	The quality of the environment is diminished, or ‘harmed’ in NPPF’ terms.
Neutral	The quality of the environment is preserved or there is a balance of adverse and beneficial effects; the environment is ‘sustained’ in NPPF terms.
Beneficial	The quality of the environment is improved, or ‘enhanced’ in NPPF terms.

- 2.16
- A neutral effect is one where, regardless of the scale of the effect, the nature of the change has no qualitative effect on the receiving environment. This could mean, for example, that there is a change to the character or composition of the view, but that the quality of the visual experience is neither better nor worse than the existing condition or that there is a balance of adverse and beneficial effects. The use of ‘neutral’ as a qualitative description of a balance of adverse and beneficial effects, or an effect that is neither beneficial nor adverse, is in accordance with the guidance provided within the GLVIA (Ref 1-1) and is standard practice for townscape and visual assessments. In built heritage assessment it equates to the heritage significance being ‘sustained’ in NPPF terms.
- 2.17
- Adverse effects are those that detract from the value of the receiving environment, for example through a removal of valuable characterising elements of the townscape or addition of new intrusive or discordant features; this would equate to ‘harm’ in NPPF terms when considering effects on the ability to appreciate the heritage significance of built heritage assets.
- 2.18
- Beneficial effects are those that contribute to the value of the receiving environment. This may be through the introduction of new, positive attributes; for example, through improvements to the setting of a built heritage asset that would enhance the appreciation of the heritage significance of that heritage asset. Where the effect is minor, moderate, major or very major, good design can reduce or remove potential harm or provide enhancement and in some cases design quality may be the main

consideration in determining the balance of positive and negative effects and the final judgement of a beneficial, neutral or adverse nature.

Built Heritage Assessment

- 2.19
- The built heritage assessment provides an assessment of the potential effects of the Proposed Development on the heritage significance or appreciation of the heritage significance of designated above-ground heritage assets. The ‘receptors’ are the identified ‘heritage assets’.

The Built Heritage Study Area

- 2.20
- In accordance with Step 1 of the methodology set out in The Setting of Heritage Assets (Ref 1-4), site inspection and testing has identified which heritage assets have settings that may be impacted by the Proposed Development. Testing has identified potential noticeable effects within 150m of the Site. Accordingly, the following built heritage study area has been defined for assessment:

- Conservation areas where all or part falls within approximately 200 m of the Site; and
- Listed structures, registered landscapes and above ground Scheduled Monuments where all or part falls within approximately 200 m of the Site.

- 2.21
- The built heritage study area includes all listed structures within an approximate 200m radius of the Site boundary, the area within which the character and composition of their settings may be changed with resultant impacts on the ability to appreciate their heritage significance. Because testing has demonstrated that the alignment of streets and spaces would create potential additional longer range visibility of the Proposed Development from Regent’s Park, additional designated heritage assets covering the park are included in the assessment. The heritage assets are mapped in Figures 4.6 and 4.7.

- 2.22
- Non-designated heritage assets have not been assessed individually in the built heritage assessment. As they make an important contribution to the quality and character of the townscape, they are considered as part of the conservation area, townscape character area or views to which they contribute.

Baseline Assessment of Sensitivity to Change of Heritage Assets

- 2.23
- The baseline value of all designated heritage assets is set out in Table 2.4.

Table 2.4: Existing Heritage Value

Value	Criteria
Very high	A site of acknowledged international townscape importance likely to be designated as a World Heritage Site; an internationally recognisable designated conservation area with exceptional distinctiveness, coherence and integrity, exhibiting unity, richness and harmony, and an exceptionally strong sense of place and likely to contain a high proportion of Grade I listed buildings; or an internationally recognisable Grade I registered landscape with associated Grade I listed structures.
High	Nationally designated structures and landscapes, and conservation areas
Medium	Locally listed buildings; non-designated heritage assets
Low to very low	Undesignated buildings and townscapes

- 2.24
- Susceptibility of a heritage asset is considered though an understanding of the heritage significance of the heritage asset and the contribution of setting (if any) to its heritage significance, or to the appreciation of that heritage significance. This is covered by Step 2 of the methodology set out in the Setting of Heritage Assets (Ref 1-4). Designated heritage assets of the same value may vary quite significantly in their susceptibility, or that of their settings.

- 2.25
- A proportionate summary of the history and character, and a proportionate summary of the relevant attributes of heritage significance of each heritage asset or group of listed structures is provided in Section 6. Appraisal of the heritage significance of each heritage asset is based on Historic England’s (HE) listing descriptions (for listed buildings and registered landscapes) and Local Authority appraisals (for conservation areas) and, where appropriate, supplementary desk-based and archival research and site inspections. HE’s Conservation Principles (Ref 1-3 and 1-3A) provides a methodology for assessing heritage significance by considering the three ‘heritage values’: archaeological interest, architecture or artistic interest and historic interest. This built heritage assessment does not cover archaeology. An assessment of heritage significance is made by considering the architectural/artistic interest and historic interest of the asset using professional judgement; the balance between the interests will vary. All designated heritage assets are considered to be of high value — or very high value where they are of international significance.

- 2.26
- In accordance with Step 2 of the methodology set out in The Setting of Heritage Assets (Ref 1-4), a description of the existing setting and an appraisal of its contribution (if any) to the heritage significance, or appreciation of the significance, of each heritage asset or group of listed buildings is provided in Section 4 based on the townscape and visual baseline assessments and site inspections of the existing settings. Setting is defined in the NPPF (Ref 1-5) as the “surroundings in which a heritage asset is experienced”. The setting of a heritage asset is not

itself a heritage asset or a heritage designation, but its value lies in what it contributes, if anything, to the heritage significance of the relevant heritage asset or the appreciation of its heritage significance. As stated in the Setting of Heritage Assets: “setting is different from general amenity. Views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting.” (Ref 1-4, para.16). Some aspects of a setting may contribute more than others to the appreciation of the heritage significance of an asset so there may also be variation across a setting in its capacity to accommodate change. The Setting of Heritage Assets notes that some views of a heritage asset contribute more to the understanding of the heritage asset; these include designed or associative views or views where the relationships between the heritage asset and other heritage assets are particularly relevant. (Ref 1-4, para.11) Therefore, settings may vary in their ‘susceptibility’, or capacity to accommodate change without harm to the heritage significance of the asset or the appreciation of that heritage significance. The baseline assessment of susceptibility is therefore considered on a case by case basis focusing on “those elements of the setting that make a positive contribution to the asset (or which better reveal its significance)” (Ref 1-5, para 200). The relevant aspects of setting in relation to the location of the Site and the contribution of setting to the appreciation of the heritage significance of the specific heritage asset will be considered in the assessment.

2.27 The value and susceptibility of each heritage asset are described in Section 4, and Table 4.1 of this volume. These judgements are combined to assess the Sensitivity to Change of each heritage asset.

Assessment of Magnitude of Impact on Built Heritage

2.28 The magnitude of the impact on the heritage significance or appreciation of the heritage significance of the asset as a result of the Proposed Development is informed by the assessment of impacts on key views of or from the heritage asset. In accordance with Step 3 of The Setting of Heritage Assets (Ref 1-4), it describes the degree to which the heritage asset or its setting would be changed by the removal of existing townscape elements or the addition of new ones and the resultant contribution that this change would make to the appreciation of the heritage significance of the heritage asset.

2.29 The assessment will vary for each individual heritage asset but will consider the location and siting, form and appearance and wider effects of the Proposed Development in relation to the heritage asset including the more detailed potential attributes affecting setting listed in the Assessment Step 3 Checklist in The Setting of Heritage Assets (Ref 1-4, p.13)

Assessment of Effects on Built Heritage Assets

2.30 The separate judgments of the sensitivity to change of the heritage asset, and the magnitude of the impact as a result of the Proposed Development are combined to allow a final judgement to be made of the likely scale

and nature of the effect on the heritage significance or appreciation of the heritage significance of the heritage asset. As recommended by The Setting of Heritage Assets (Ref 1-4). the assessment is not carried out solely through the use of tables or matrices: the rationale for the judgement is clearly and transparently explained in the text to demonstrate how the final assessment has been derived, and is summarised based on the broad categories set out in Tables 2.3A and B.

2.31 The qualitative judgement of the nature of the effect is further considered in relation to the NPPF (Ref 1-5, paras. 195 and 196,) where appropriate. Any adverse effects on the heritage significance of designated heritage assets are further assessed as causing ‘substantial’ or ‘less than substantial’ harm to heritage significance or the appreciation of heritage significance. The Secretary of State has consistently found (in line with the Bedford High Court judgement (Ref 1-6) that ‘substantial harm’ occurs only when much if not all of the heritage significance of a designated heritage asset is vitiated or very much reduced and is therefore a high test, particularly in relation to impacts on settings. Where the scale of harm would be ‘less than substantial’ this is further assessed on a spectrum of low to high, with low being a very slight degree of harm and high being close to but lower than an almost total loss of significance consistent with ‘substantial harm’, at its upper end.

Townscape Assessment

The Townscape Study Area

2.32 As a result of testing, a townscape study area radius for assessment of approximately 200 m from the Site boundary has been defined. This is an area within which it is judged, using professional judgement based on site visits and model testing of visual impacts, that there may be potentially noticeable townscape effects. Areas of designated townscape are also assessed separately in the Built Heritage Assessment.

Baseline Assessment of Townscape Sensitivity to Change

2.33 Within the study area the existing townscape character has been appraised and divided into areas of broadly similar character and quality; these ‘townscape character areas’ (TCAs), are the townscape receptors for assessment. The characterisation of the townscape character areas is based on desk top research and site survey. It also draws on the LBC Euston Area Plan (Ref 1-7) and its supporting Historic Area Assessment (Ref 1-7A) and the Camden Character Study (Ref 1-8).

2.34 In Section 4 the extent of each character area has been identified in Figure 4.8 and its character described in Table 4.2. It should be noted that townscape character almost invariably forms part of a continuum and that character area boundaries are often not distinct.

2.35 Criteria for assessing townscape value are based on any designation of the townscape and individual features within it, and qualitative aspects of the townscape character. Attributes which are generally agreed to influence the aesthetic and perceptual quality of the townscape are described in the GLVIA (Ref 1-1, Box 5.1). Townscape value has been allocated to one of five categories in Table 2.5.

Table 2.5: Existing Townscape Value

Value	Criteria
Very high	A site of acknowledged international townscape importance likely to be designated as a World Heritage Site; an internationally recognisable designated conservation area with exceptional distinctiveness, coherence and integrity, exhibiting unity, richness and harmony, and an exceptionally strong sense of place and likely to contain a high proportion of Grade I listed buildings; or an internationally recognisable Grade I registered landscape with associated Grade I listed structures.
High	A designated conservation area of outstanding townscape interest with a strong townscape structure, considerable attractiveness and coherence and a high proportion of listed buildings.
Medium	Good quality townscape. Designated conservation areas or undesignated townscapes of local importance with notable coherence and integrity and listed or unlisted buildings that contribute to an attractive townscape with distinctive character and sense of place.
Low	Ordinary quality townscape; typical, unremarkable undesignated areas of townscape with distinguishable structure but modest integrity, architectural character or distinctiveness. That may include some individual buildings of local heritage interest, but also potentially detracting features.
Very Low	Poor quality townscape of negligible architectural or historic merit, lacking legible townscape structure and coherence and likely to contain significant detracting or intrusive features.

2.36 As the GLVIA states, a highly valued designated townscape does not automatically or by definition have a high sensitivity to change. Townscape susceptibility, as defined in the GLVIA (Ref 1-1, para 5.40-5.42), is the ability of the townscape receptor to accommodate the Proposed Development without “undue consequences for the maintenance of the baseline situation” (para.5.40). In other words, a judgement of whether the townscape could absorb the Proposed Development without harming its baseline character and quality with specific reference to the particular type of development that is being proposed. Judgements of susceptibility are described for each townscape character area and recorded on a simple scale of High, Medium and Low. The value and susceptibility of each townscape character area are described in Section 4, Table 4.2. Those judgements are combined to assess Sensitivity to Change.

Assessment of Magnitude of Impact on Townscape

- 2.37 For the townscape character area that includes the Site, the judgement of the size or scale of change as a result of the Proposed Development is based on consideration of the extent to which existing townscape features within the Site boundary would be lost, the contribution of the features lost to the character of that townscape, and the urban design and architectural quality of the Proposed Development that replaces them, how this integrates with the surrounding townscape within the character area — and the degree to which the aesthetic or perceptual aspects of the townscape would be altered as a result.
- 2.38 In character areas that do not include the Site, the judgement of the size or scale of the change is based on consideration of the impact on the townscape character and quality as a result of changes to the wider setting of the specific character area. This is informed by the assessment of changes to representative views of or from the character area.
- 2.39 The geographical area over which the changes would be experienced, i.e. how widely the townscape character area would be affected by the Proposed Development, is considered. In most cases the size or scale of change would not be experienced consistently across the extent of the character area. Where the impacts of the Proposed Development on a character area would be localised to one part of the townscape character area, or would vary across the extent of the character area, this would result in a range of magnitude of impact for that character area.

Assessment of Townscape Effects

- 2.40 The final assessment of the scale of the townscape effect on each of the townscape character areas is based on the combination of the judgements of sensitivity to change of the character area and magnitude of change as a result of the Proposed Development. The rationale for the judgement is clearly and transparently explained to demonstrate how the final assessment has been derived, and is summarised based on the broad categories set out in Tables 2.3A and B.

Visual Assessment

The Visual Assessment Study Area

- 2.41 The visual study area, which is informed by site observation and visual impact testing, is not defined by a radius from the Site boundary because differences in the scale and alignment of the existing townscape result in variation in the distance from which the Proposed Development would be visible, for example there is usually greater visibility along aligned routes and across open spaces.
- 2.42 12 verified views for assessment were selected in consultation through testing and pre-application discussions. The proposed views for

assessment were issued to LBC officers in a Views Candidate Study in September 2020; no response has yet been received. All views assessed in this volume have been carefully selected in order to consider potential effects on specific designated views and representative and illustrative views that demonstrate the range of ways in which the Proposed Development would be seen and the resultant visual effects on “the general amenity experienced by people” (Ref 1-1, paras. 2.21). The views selected allow a methodical 360 degree view analysis of near, middle and distant views of the Proposed Development on representative visual receptors in the area likely to be affected by the visibility of the Proposed Development.

- 2.43 The visual assessment is not an exhaustive assessment of all potential visual effects but an assessment of a sufficient number of views from a variety of distances and directions that allow a proportionate assessment of changes to visual amenity. The detailed location of each viewpoint has been carefully considered to be typical or representative of the view likely to be experienced by a visual receptor in this location.
- 2.44 Public views are generally attributed greater value than views from private property because they are experienced by a greater number of people and therefore represent a greater proportion of the visual receptor community. All verified views have therefore been taken from publicly accessible land. The likely visual effects on views from inside buildings that are not publicly accessible or from private land have not been considered in this assessment.
- 2.46 Due to the timing of the application, new winter photography could not be captured so some views have been assessed using photographs taken during the summer but the baseline assessment describes how the composition and quality of the view would vary with seasonal change, and changes in atmospheric conditions where applicable. Views are often kinetic or sequential, therefore where appropriate, consideration and explanation of how a view would change as the observer moves around or through the viewing position is included in the baseline description.
- 2.47 As acknowledged by the Landscape Institute’s Technical Guidance Note, Visual Representation of Development Proposals (Ref 1-9), in reality no static photography is able to fully capture the richness and depth of the human viewing experience. Only the central 6-10 degrees of a view is seen in detail by the human eye but the scene beyond this can be appreciated in peripheral vision without moving the eyes – or by moving the eyes or rotating the head the focal point of the view can be changed. Both the clarity of the focal point, or multiple focal points of a view, and the appreciation of the wider context, contribute to our appreciation of the environment and for most views both aspects need to be equally well understood for a view to be robustly assessed.
- 2.48 Perspective is uniquely determined by the viewpoint position and direction of view, so cannot be altered by the use of different camera lenses. The scale of the buildings in a photographic image is a factor only of the size of the print or the image on screen. The choice of lens used to

photograph a view, and consequently the horizontal field of view (HFOV), is therefore made on the basis of the requirements for assessment, which may vary from view to view. The human eye has a HFOV of about 110°. ‘Normal’, or ‘Standard’ lenses (36–60mm in 35mm film format) cover between 62° and 40° so do not always provide the necessary context for a full appreciation of the human experience of the view.

- 2.49 Where the wider context of the view should be considered - and in most situations a viewer would naturally make use of peripheral vision in order to understand the whole – it is logical to use a wider angle lens (24–35mm in 35mm film format) which would cover a FoV between 84° and 64°. The Landscape Institute Technical Guidance Note (Ref 1-15) states that “A ‘standard’ lens (50mm FL on a FFS Camera) typically captures a HFOV of just under 40 degrees. This may be suitable for some purposes, but a single-frame photograph based on this FoV may not convey the breadth of visual information required to represent a proposed development and relevant context... the general requirement is to capture enough of the scene to represent the landscape/townscape setting and the likely visibility of the proposal” (Appendix 4, paras.4.2.3-4.2.5). Where the viewing point is studied at rest and the eye is free to roam over a very wide field of view and the whole setting of the view can be examined by turning the head it may be appropriate to provide a panorama comprising a number of photographs placed side by side to cover an even wider field of view. It will also be necessary to provide a wider HFOV for close viewpoints in order to capture the entire proposal; as stated in the Landscape Institute guidance “Views should include the full extent of the site/development and show the effect that it has upon the receptor location” (Appendix 4, para.4.1.5).
- 2.50 The views in the visual assessment have been used to inform the assessment of effects on heritage assets and townscape, where relevant. Additional views tested during the design development process but not verified or assessed are included in Appendix A. They have not been verified because the potential effects were not considered significant or because other viewing positions were selected in preference to demonstrate the likely visual or townscape effects or effects on the settings of built heritage assets, but they may be referred to in the assessments.

Baseline Assessment of Sensitivity to Change

- 2.51 The baseline characteristics of each view, including the attributes described in the GLVIA (Ref 1-1, para 6.24) and the LVMF SPG (Ref 1-2, p.8), and the contributions of any heritage assets to the view have been described where relevant. The value attached to a view takes account of any designation, the quality of the townscape seen in the view including heritage assets that may be visible in or from the viewing position, and the composition and scenic quality of the view.

Table 2.6: Existing Value of the View

Value	Criteria
Very high	Designated views of national or international importance: identified views into and out of a World Heritage Site; the Protected Vista or Protected Silhouette of a designated LVMF view.
High	Designated views of regional importance: LVMF or Borough views.
Medium	Valued local views noted in planning policy or conservation area appraisals; significant views of designated heritage assets or noted local landmarks; well composed representative views though townscape of good or high value.
Low	Representative views through townscape of ordinary or low value and incidental views through townscape of good or high value
Very Low	Incidental views through townscape of low or very low value

- 2.52 This assessment, as recommended in the GLVIA (Ref 1-1), considers the visual receptors to be the people experiencing each view. The susceptibility of the visual receptors to changes in their visual amenity, combined with the intrinsic value of the view, are combined to give a judgement of the view’s sensitivity to change.
- 2.53 There are limitations to this approach: the GLVIA defines “visual effects’ as “effects on specific views and on the general visual amenity experienced by people” (Ref 1-1, para 2.21). The glossary of the GLVIA defines ‘visual amenity’ as “the overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area”. It does not expand on what might amount to ‘pleasantness’ or what might be conducive to the ‘enjoyment of activities’, presumably because the measuring of psychological effects such as these are inevitably beyond the scope of the landscape/ townscape professional. The ‘pleasantness’ of the view and ‘enjoyment’ of the viewer is influenced by individual perception and taste, which is hard to judge, may vary dramatically from person to person and therefore has limited validity.
- 2.54 The GLVIA advises that the baseline visual assessment should include “the type and relative number of people (visual receptors) likely to be affected, making clear the activities that they are likely to be involved in” (Ref 1-1, para. 6.24 and goes on to categorise the susceptibility of these types of people to changes in their visual amenity (para. 6.32-4). Furthermore, the assessment of susceptibility should consider the extent to which the attention of any likely visual receptors would be focussed on views and visual amenity. Assessing visual effects is not a quantitative process and in a busy urban townscape context it is not practical to provide even approximate numbers of visual receptors; the relative busyness of a viewing position is however described where appropriate.

- 2.55 Assumptions as to the susceptibility of various groups of visual receptors described in para 6.33-6.36 of the GLVIA. As described in para.6.33, the visual receptors with the highest susceptibility are likely to include:
 - “residents at home”, though private visual amenity is not assessed within this document, so will rarely apply;
 - “residents or visitors engaged in outdoor recreation... whose attention or interest is likely to be focused on the landscape and on particular views”. This category would include, for example, walkers using local rights of way and is relatively rare in urban townscape assessments but may be relevant in considering visual effects on parks and other open spaces and recognised scenic routes.
 - “Visitors to heritage assets or other visitor attractions where views of the surroundings are an important contributor to the experience” This also applies to visitors to designated viewpoints such as LVMF viewing positions;
 - “Communities where views contribute to the landscape [or townscape] setting enjoyed by residents”. This would also apply to residential areas of good townscape quality, likely to be designated conservation areas;
 - Travellers by road or rail along “recognised scenic routes, where awareness of views is likely to be particularly high”. This is relatively rare in urban townscape contexts.

- 2.56 As set out in GLVIA para 6.34 the following visual receptors are likely to have the lowest susceptibility: “People engaged in outdoor sport or recreation which does not involve or depend upon appreciation of views of the landscape” and “People at their place of work whose attention may be focused on their work or activity rather than their surroundings” The assumptions made in the GLVIA do not cover an exhaustive range of the visual receptors.
- 2.57 Judgements of susceptibility are described for each view and recorded on a simple scale of Very High, High, Medium, Low and Very Low.

Assessment of Magnitude of Visual Impact

- 2.58 To demonstrate the change to the view as a result of the Proposed Development, three separate images have been prepared from each viewing location selected:
 - 1. Baseline** – the view as it exists currently;
 - 2. Proposed** – with the Proposed Development inserted in render and/ or wireline form; and
 - 3. Cumulative** – with the Proposed Development inserted in render and/or wireline form together with other cumulative schemes inserted (as wirelines);

- 2.59 The Proposed Development has been shown either in render or a blue wireline. Where the Proposed Development would not be visible, its position relative to the existing view may be shown with a dashed outline and a light fill where this helps to aid legibility. The methodology employed by the visualisation firm, Cityscape, to create the verified views is provided in Appendix D. The Visual Assessment, in Section 8 of this volume is based on the images prepared by Cityscape which are, in turn, based on the computer generated model of the Proposed Development prepared by the architects, who have confirmed the accuracy of the visualisations in relation to their design proposals before the Tavernor Consultancy have assessed them.
- 2.60 The judgement of size and scale of change to a view is based on a professional appraisal of interrelated factors set out in paragraph.6.39 of the GLVIA, which are described in narrative accompanying the proposed view where relevant. The geographical extent of the of a visual effect reflects the distance of the viewing position from the visible parts of the Proposed Development and any kinetic or seasonal impacts on its visibility from this distance.

Assessment of Visual Effects

- 2.61 The final assessment of the scale and nature of the visual effect on each of the verified views is based on the combination of the judgements of sensitivity to change of the existing view and magnitude of impact as a result of the Proposed Development. The rationale for the judgement is clearly and transparently explained to demonstrate how the final assessment has been derived, and is summarised based on the broad categories set out in Tables 2-3A and B.

Demolition and Construction Effects

- 2.62 Potential demolition and construction impacts would comprise the visibility of machinery, cranes and other equipment used in construction works (including the site office facilities); the part construction of the development; and the hoarding and site lighting which would be visible at street level. The scale of effects would vary according to the proximity of the receptor to the Site and would be adverse or neutral, reversible and short-term. Detailed assessment of the construction effects on the settings of built heritage assets, townscape character areas and views is not appropriate for the continuously changing impacts over the entire construction period. The assessment is considered appropriate and proportionate in relation to the temporary and constantly changing nature of the potential effects.

Cumulative Assessment

- 2.63 The townscape, visual, and built heritage assessments place the Proposed Development in its emerging urban context. The cumulative assessments

consider schemes in the local and wider area that are likely to have a perceptible effect in combination with the Proposed Development. The key cumulative schemes, with potential for noticeable effects due to their scale and/or proximity to the Proposed Development are listed in Table 2.7. In the cumulative views these schemes are distinguished by an orange wireline. They are named and their interaction with the Proposed Development is described in the narrative accompanying the cumulative view where relevant to the assessment.

2.64 As set out in GLVIA para 7.3, the cumulative assessment is an assessment of the “additional changes caused by a proposed development in conjunction with other similar developments” and is based on an assumption of high-quality design of each of the individual cumulative developments. Table 2.7. In more distant views, additional significant committed development that are more distant from the Site than those in Table 2.7 have also been included and are described in the text where relevant to the cumulative assessment of the Proposed Development.

Table 2.7: Cumulative Schemes

Development	Summary Description	Status
Central Sommers Town 2015/2704/P	7 buildings ranging from 3 to 25 storeys in height	Consented
Stephenson House, 75 Hampstead Road 2017/3518/P	Extensive internal and external refurbishment of Stephenson House to provide a ground plus 7 storey building	Consented

Assumptions and Limitations

2.65 The cumulative assessment is an assessment of the likely effects of the cumulative schemes in combination with the Proposed Development. It assumes that all the cumulative schemes are of high quality because they have been approved or submitted following a period of design development in consultation with LBC officers (or the relevant LPA officers where cumulative schemes are located outside of the LBC).

2.66 The assessment of townscape and visual effects and effects on the heritage significance of designated built heritage assets, is informed by relevant policy and guidance and also by professional judgement. Judgements on the scale and nature of effects, while they follow the clear process of sub-assessments set out in this methodology are always subjective to an extent, as acknowledged in the GLVIA (Ref 1-1, paras. 2.23-2.25). The assessment narratives in this volume has been set out as clearly as possible with description of the factors that have informed the assessment.



Planning Policy Context

Legislation

Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) (Ref 1-10)

- 3.1
- Most of the principles that should be adhered to when determining planning applications that affect the historic environment are set out in policy and guidance. However, local planning authorities must also comply with important statutory duties when weighing the planning balance, as set out within the Planning (Listed Buildings and Conservation Areas) Act 1990 (the "Act"). The principle statutory tests of relevance within the Act are as follows:
- a. Section 66(1) states that "in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"; and
- b. Section 72(1) states that "in the exercise, with respect to any buildings or other land in a conservation area, of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area." Sub-section (2) explains that the provisions referred to within subsection (1) include the Planning Acts."

National Planning Policy and Guidance

National Planning Policy Framework (NPPF) (2019) (Ref 1-5)

- 3.2
- A National Planning Policy Framework (NPPF) was introduced in 2012 to replace the previous Planning Policy Statements (PPS), and revised in July 2018, February 2019 and June 2019. It sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system.
- 3.3
- Chapter 12 notes that "the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities" (para.124). It notes that development should optimise the potential of the site to accommodate and sustain

an appropriate amount and mix of development (para.127) and that design quality should be considered in the assessment of development proposals (para.128).

- 3.4
- Policy and guidance relating to conservation and enhancement of the historic environment is set out in Chapter 16 of the NPPF.
- 3.5
- As the NPPF Glossary (Annex 2) defines it, 'significance' is "the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting." (p. 71) The significance of relevant heritage assets is described in Section 4.
- 3.6
- When determining applications, the NPPF requires Local Planning Authorities to account for:
 - "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." (para. 192).
- 3.7
- When assessing the likely impact of a proposed development, "great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance" (para. 193). The substantial harm or loss of significance to Grade I and II* listed buildings and World Heritage Sites (WHS) should be wholly exceptional.
- 3.8
- Less than substantial harm "should be weighed against the public benefits of the proposal" (para.196). Less than substantial harm may be considered on a spectrum and further assessed as being at the lower or upper end of this scale. Substantial harm to significance will be permitted when the harm enables the proposed development to provide "substantial public benefits that outweigh that harm or loss" or when all of the following criteria are met:

	<ul style="list-style-type: none"> • "the nature of the heritage asset prevents all reasonable uses of the site; and • no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and • conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and • the harm or loss is outweighed by the benefit of bringing the site back into use." 		its setting therefore a thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.		
3.9	When considering proposals for development within the setting of a heritage asset, Local Planning Authorities are required to seek opportunities for enhancement and to treat favourably proposals which "preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset" (para.200).		3.14 When identifying harm and assessing its degree, the PPG advises that: "What matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting. Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting." (018 Reference ID: 18a-018-20190723)		<i>National Design Guide (2019) (Ref 1-12)</i>
	<i>Planning Practice Guidance (PPG) (First published March 2014; thereafter continuously updated) (Ref 1-11)</i>				
3.10	The PPG, published by the Department for Communities and Local Government (DCLG), is an online resource providing guidance on implementing the policies of the NPPF. There are two sections of the PPG that are of particular relevance to this assessment:		3.15 In relation to harm to conservation areas, the PPG gives advice in relation to assessment of demolition of buildings within conservation areas, which is not applicable to this assessment (para. 019 Reference ID: 18a-019-20190723).		3.18 Published on 1st October 2019, the National Design Guide (NDG) sets out the characteristics of well-designed places and demonstrates what good design means in practice. It forms part of the government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on 'Design: process and tools'. The guidance is intended to support the NPPF which sets out that achieving high quality places and buildings is fundamental to the planning and development process. The NDG outlines the Government's priorities for well-designed places in the form of ten characteristics. The guidance states that: 'In a well-designed place, an integrated design process brings the ten characteristics together in a mutually supporting way. They interact to create an overall character of place.' (page. 4)
	<ul style="list-style-type: none"> • Design: process and tools; and • Historic environment. 		3.16 The avoidance and minimisation of harm to heritage assets is attributed to a clear understanding of the significance of a heritage asset and its setting. The PPG advises that "Early appraisals, a conservation plan or targeted specialist investigation can help to identify constraints and opportunities arising from the asset at an early stage. Such appraisals or investigations can identify alternative development options, for example more sensitive designs or different orientations, that will both conserve the heritage assets and deliver public benefits in a more sustainable and appropriate way." (para. 008 Reference ID: 18a-008-20190723)		3.19 The NDG outlines the key components of good design, including: layout; form; scale; appearance; landscape; materials; and detailing. The document states that: 'All developments are made up of these components put together in a particular way. The choices made in the design process contribute towards achieving the ten characteristics and shape the character of a place.' (page. 5)
3.11	The PPG on 'Design: process and tools', which supports Section 12 of the NPPF, states that local planning authorities are required to take design into consideration, stating that: "where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development." It goes on to state that good design is set out in the National Design Guide (Ref 1-12).		3.17 The NPPF requires less than substantial harm to heritage assets to be weighed against public benefits, which are defined in the PPG as follows: "Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits." (para. 020 Reference ID: 18a-020-20190723).		3.20 The ten characteristics that contribute towards well-designed places and are intended to foster local character, community and be sensitive to climate change, are: <ul style="list-style-type: none"> • Context – enhances the surroundings; • Identity – attractive and distinctive; • Built form – a coherent pattern of development; • Movement – accessible and easy to move around; • Nature – enhanced and optimised; • Public spaces – safe, social and inclusive; • Uses – mixed and integrated; • Homes and buildings – functional, healthy and sustainable; • Resources – efficient and resilient; and • Lifespan – made to last.
3.12	The guidance further provides details of tools for assessing and improving design quality, including: the National Design Guide; local design guides and codes; design review; and assessment frameworks. (Paragraph: 016 Reference ID: 26-016-20191001).				
3.13	The PPG on Conserving and Enhancing the Historic Environment supports Section 16 of the NPPF. "Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential effect and acceptability of development proposals." (para. 007; Reference ID: 18a-007-20190723). Significance derives not only from a heritage asset's physical presence, but also from				3.21 Each of these ten characteristics are described in detail in Part 2 of the NDG and each heading includes two or three policy directions and a number of good practice examples.

3.22 Within ‘Context’ and ‘Identity’, the guidance emphasises the importance of understanding place, noting that new development should respond positively to the site itself and its local and wider context. The NDG further highlights the importance of understanding the history of how a place has evolved, noting that well-designed places and buildings are influenced positively by the significance and setting of heritage assets and any other specific features that merit conserving and enhancing. The PPG, published by the Department for Communities and Local Government (DCLG), is an online resource providing guidance on implementing the policies of the NPPF (Ref 1-5). Design: process and tools (updated 1st October 2019) is relevance to this assessment.

Historic England Advice Note 4: Tall Buildings (2015) (Ref 1-13)

3.23 This guidance supersedes Guidance on Tall Buildings published by CABE (now Design Council CABE) and English Heritage (now Historic England) in 2007. Historic England’s advice “focuses on how the value of heritage assets may be affected, and how the heritage conservation objectives within legislation and national policy can best be achieved” (p 1).

3.24 This document provides guidance on the assessment of the potential effects of tall buildings on the historic environment. While it recognises that “Towns and cities evolve, as do their skylines... In the right place well-designed tall buildings can make a positive contribution to urban life” it also notes that “if the building is not in the right place and well designed a tall building, by virtue of its size and widespread visibility, can also seriously harm the qualities that people value about a place... One of the principal failings in the design of certain tall buildings was a lack of understanding of the nature of the area around them, and the impact they would have on both specific features of the historic environment and its general character.” (p.2).

3.25 Planning applications for tall buildings would need to address the likely effects of a tall building in isolation and cumulatively with concurrent proposals. An application including a tall building would be expected to include:

- a. Accurate and realistic representations of the proposal
- b. Consideration of the character of surrounding areas and the settings of heritage assets
- c. Consideration of impact on significant views
- d. Consideration of impact on townscape and public realm
- e. Other relevant environmental issues, particularly sustainability and environmental performance, e.g. the street level wind environment” (para.4.7)

3.26 The guidance states that tall buildings should set exemplary standards of urban design and architecture. “Good design will take the opportunities available for improving the character and quality of an area and respond to local character and history” (para. 4.9). “Consideration needs to be given to a tall building’s contribution to public space and facilities. This applies both internally and externally, including the provision of a mix of uses (especially on the ground floor of towers), as part of a well-designed public realm. Consideration of the impact on the local environment is also important, including microclimate, overshadowing, night-time appearance, light pollution, vehicle movements, the environment and amenity of those in the vicinity of the building, and the impact on the pedestrian experience. Well-designed tall buildings provide an inclusive environment, both internally and externally, taking opportunities to offer improved permeability, accessibility and, where appropriate, the opening up or effective closure of views to improve the legibility of the wider townscape.” (para. 4.10)

“A high quality scheme will have a positive relationship with:

- a. Topography
- b. Character of place
- c. Heritage assets and their settings
- d. Height and scale of development (immediate, intermediate and town- or city-wide)
- e. Urban grain and streetscape
- f. Open spaces
- g. Rivers and waterways
- h. Important views including prospects and panoramas
- i. The impact on the skyline” (para. 4.5)

“Delivering architectural quality involves a consideration, amongst other things, of the building’s:

- a. Scale
- b. Form and massing
- c. Proportion and silhouette
- d. Facing materials
- e. Detailed surface design
- f. Relationship to other structures

g. Impact on streetscape and near views

h. Impact on cityscape and distant views

i. Impact on the skyline” (para. 4.8)

Regional Planning Policy and Guidance

The London Plan: Spatial Development Strategy for Greater London: Consolidated with Alterations since 2011 (2016) (Ref 1-14)

3.27 The London Plan: Spatial Development Strategy for Greater London was adopted by the Greater London Authority (GLA) in July 2011. Minor amendments were made to the Plan in October 2013 and further alterations were published in March 2015 and March 2016. The London Plan is the overall strategic plan for London, which sets out the economic, environmental, transport and social framework for development over the next 25 years. The Plan continues the GLA’s support of high-quality design which relates successfully to its context. The London Plan contains policies that must be considered in relation to the Proposed Development, these are outlined below. →

3.28 Policy 7.7 relates to the location and design of tall and large buildings. 7.7B states that applications for tall buildings should include urban design analysis and 7.7D that tall buildings “should not impact on local or strategic views adversely” (p.293), particular consideration of these effects should be given when the proposed development may affect listed buildings and their setting, conservation areas, Registered Parks and Gardens and WHSs (7.7E). In general, the policy emphasises the necessity for large scale development to be of the highest architectural quality, that tall buildings will only be considered in areas whose character would not be adversely affected by their scale or massing and that they must relate to the context and character of the surrounding built environment. Urban design analysis should demonstrate that the proposal is part of a strategy that will meet the criteria below:

- a. Generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport;
- b. Only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building;
- c. Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;
- d. Individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London;

<p>e. Incorporate the highest standards of architecture and materials, including sustainable design and construction practices;</p> <p>f. Have ground floor activities that provide a positive relationship to the surrounding streets;</p> <p>g. Contribute to improving the permeability of the site and wider area, where possible;</p> <p>h. Incorporate publicly accessible areas on the upper floors, where appropriate; and</p> <p>i. Make a significant contribution to local regeneration.</p>		<p>by having a sufficient level of design information provided as part of the application, and conditioning the ongoing involvement of the original design team should be considered.</p>
<p>3.29 Policies 7.8 to 7.10 consider the Historic Environment, 7.8C states that “Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail” (p.295). Policy 7.11 and 7.12 acknowledge the London View Management Framework Supplementary Planning Guidance (LVMF SPG) (Ref 1-2) and the requirement that any proposed development must be considered against the list of designated strategic views to assess the level of effect the proposed development would have on these views.</p>	<p>3.31 Policy D1 London’s form, character and capacity for growth notes that Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area. This includes assessment of urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density), heritage assets, views and landmarks.</p>	<p>3.34 Policy D8 Public realm, which will replace policy 7.5 of the adopted London Plan (Ref 1-14), states that development proposals should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. The public realm should be seen as a series of connected routes and spaces that help to define the character of a place. Its design should be based on an understanding of how the public realm in an area functions and creates a sense of place.</p>
<p><i>The New London Plan: Spatial Development Strategy for Greater London: Intend to Publish version (December 2019) (Ref 6-14A)</i></p> <p>3.30 The Examination in Public (EiP) on the emerging new London Plan was held between 15 January and 22 May 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8 October 2019. The Mayor has considered the Inspectors’ recommendations and, on the 9 December 2019, issued to the Secretary of State his intention to publish the London Plan. The Secretary of State issued a response on 13 March 2020 (Ref 1-14B), which directed change to some policies, (including Policy D3, which is of relevance to this assessment) and is currently being considered by the Mayor. Once adopted the new London Plan will run from 2019 to 2041. The following policies are relevant to this assessment and relevant elements of their content are summarised below: Chapter 3 Design:</p>	<p>3.32 Policy D3 Optimising site capacity through the design-led approach states that “All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity” and continues that development proposals should “enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions”. The Secretary of State has directed that Policy D3 should be modified to state that “The design of the development must optimise site capacity” (Ref 1-14B), meaning that development should take the most appropriate form for the site and that higher density developments should be promoted in areas that are well connected to jobs, services infrastructure and amenities. Where there are existing clusters of high-density buildings expansion of the clusters should be positively considered and gentle densification in low and mid density locations should be considered.</p>	<p>3.35 Policy D9 Tall buildings will replace Policy 7.7 of the adopted London Plan (Ref 1-14). It states that while high density does not need to imply high rise, “tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as main centres of activity, and important street junctions and transport interchanges. Tall buildings that are of exemplary architectural quality, in the right place, can make a positive contribution to London’s cityscape, and many tall buildings have become a valued part of London’s identity. However, they can also have detrimental visual, functional and environmental effects if in inappropriate locations and/or of poor-quality design” (para. 3.9.1). The visual impacts of proposed tall buildings need to be considered in: long range views, in which a new tall building should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views; mid-range views in which the proposal should make a positive contribution to the local townscape in terms of legibility proportions and materiality; and immediate close views from the surrounding streets in which the base of the building should have a direct relationship with the human scale and character of the street. Whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding. Architectural quality and materials should be of an exemplary standard. Tall buildings should positively contribute to the character of the area. Proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings; proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm. Buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it. Publicly accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings.</p>
<ul style="list-style-type: none"> • Policy D1 London’s form, character and capacity for growth • Policy D3 Optimising site capacity through the design-led approach • Policy D4 Delivering good design • Policy D8 Public realm • Policy D9 Tall buildings 	<p>3.33 Policy D4 Delivering good design states that where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. Design review panels should be used to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made, if they are above the applicable density in Policy D6 or propose a building defined as a tall building by the borough or one that is more than 30 m in height where there is no local tall building definition. It is important that design quality is maintained throughout the development process from the granting of planning permission to completion of a development so the design quality of development should be protected</p>	<p>3.36 Policy HC1 Heritage conservation and growth will replace Policy 7.8 of the adopted London Plan (Ref 1-14) and states that development</p>

proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. **Policy HC3 Strategic and Local Views**, like Policy 7.11 of the adopted London Plan (Ref 1-14) describes the LVMF SPG and States that the Mayor will, when necessary, review the LVMF SPG. Unlike Policy 7.11 it requests that boroughs clearly identify important local views in Local Plans and strategies; it states that local views should be protected and managed in a similar manner as Strategic Views. **Policy HC4 London View Management Framework**, like policy 7.12 of the adopted London Plan (Ref 1-14), states that development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve or enhance viewers’ ability to recognise and to appreciate Strategically Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.

London View Management Framework Supplementary Planning Guidance (LVMF SPG) (2012) (Ref 1-2)

- 3.37 The LVMF SPG was published in March 2012. It was created to provide additional clarity and detail to the sections of the adopted London Plan (Ref 1-14) that deal with the management of important London views.
- 3.38 The LVMF SPG includes thirteen Protected Vistas - of St Paul’s Cathedral, the Palace of Westminster and the Tower of London - which replace the ten Strategic Views of RPG3A (1991). The Protected Vistas are geometrically defined and place additional consultation and referral requirements on development which exceeds the defined threshold plane. The Protected Vistas are included within views from a total of 27 Viewing Places identified in the LVMF SPG. The views are separated into four categories ‘London Panoramas’, ‘River Prospects’, ‘Townscape Views’ and ‘Linear Views’. All of the views in the LVMF SPG are subject to Qualitative Visual Assessment, as outlined in the Management Plan for each designated view provided in the Framework.
- 3.39 The Proposed Development would be visible in London Panoramas from Parliament Hill and Primrose Hill. The Proposed Development would lie in the foreground Landmark Viewing Corridor (LVC) of the London Panorama from Parliament Hill, Assessment Point 2A.2 and within the background Wider Setting Consultation Area (WSCA) of the London Panorama from Greenwich Park, Assessment Point 5A.2.
- 3.40 The LVMF SPG is also a useful guidance document for undertaking visual assessments of undesignated views more generally. Section 3 (Ref 1-2, pp. 7-9) of the guidance includes a methodology for the assessment process which includes guidance on describing the baseline characteristics and impacts on a view.

Local Planning Policy

Camden Local Plan (2017) (Ref 1-15)

- 3.41 The Camden Local Plan adopted in July 2017 sets out the Council’s planning policies and replaces the Core Strategy (Ref 1-16) and Development Policies (Ref 1-16A) adopted in 2010. The following policies are of particular reference to this assessment:
- Policy D1 Design
 - Policy D2 Heritage
- 3.42 **Policy D1 Design** states that LBC will seek to secure high quality design and “*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.” (Ref 1-15)*
- 3.43 The supporting text states that the council will welcome high quality contemporary design which responds to its context and will require all development to consider the following:
- character, setting, context and the form and scale of neighbouring buildings;
 - the prevailing pattern, density and scale of surrounding development;
 - the impact on existing rhythms, symmetries and uniformities in the townscape;
 - the composition of elevations;
 - the suitability of the proposed design to its intended use;
 - inclusive design and accessibility;
 - its contribution to public realm and its impact on views and vistas; and
 - the wider historic environment and buildings, spaces and features of local historic value.
- 3.44 The supporting text describes strategically important views that originate in or extend into the borough, including LVMF views of St Paul’s and the Palace of Westminster. The document also lists ‘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 statutes (for example, Centrepont, St Stephen’s, Rosslyn Hill and St George’s, Bloomsbury).
- 3.45 The document also states: “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.” (Ref 1-15,

	para.7.30) Further guidance on important local views is set out in individual conservation area statements.				
3.46	Policy D1 also covers tall buildings. The document defines tall buildings as those “which are substantially taller than their neighbours or which significantly change the skyline.” (Ref 1-15, para.7.35). The supporting text states that “While tall buildings offer the opportunity for intensive use, their siting and design should be carefully considered in order not to detract from the nature of surrounding places and the quality of life for living and working around them” (para.7.35) The policy does not assessment criteria for the suitability of tall buildings within the borough but refers to London Plan Policy 7.7 (Ref 1-14) on the location of tall and large buildings and the Historic England Advice Note 4 on Tall Buildings (Ref 1-13). The Local Plan does not identify areas of the borough which might be suitable for tall buildings but states that “the entire borough is considered as being within the ‘sensitive’ category, as defined by the English Heritage / CABE Guidance on Tall Buildings. Tall building proposals in Camden will therefore merit detailed design assessments.” (Ref 1-15, para.7.36).	3.49	EAP Section 3.3 Design Strategy includes Strategic Principle EAP 2: Design: <i>“A: Development and change will create an integrated, well connected and vibrant place of the highest urban design quality, which builds on existing character and provides an attractive and legible environment for local people, workers and visitors.</i> <i>B: Any proposals should fully address the following key urban design principles:</i> <ul style="list-style-type: none"> • Improving connectivity by enhancing existing and providing new east-west and north-south links, reinstating the historic Euston area street pattern and improving wayfinding; • Transforming the public realm through improvements to streets and the buildings that front them; • Providing active frontages along key streets to enliven streetscapes and make them attractive and safe routes; • Creating a network of new and improved open spaces and squares; • Ensuring that development is of the highest architectural quality and designed to be accessible to all; • Responds to the viewing corridors, scale and character of existing buildings, and context; • Protecting and enhancing heritage assets and their settings that are sensitive to change; and • Ensuring world class station design and a comprehensive approach to above station development. <i>C: While the strategic viewing corridors will limit development heights in the Euston area there may be some opportunities for taller buildings subject to design, heritage and policy considerations.”</i>	3.51	The further detail on Building heights, massing and scale on pages 49-50 of the guidance states: “Euston’s potential role as a major economic driver within the Central Activities Zone (CAZ) and its function as a major transport hub make it a suitable location for maximising development opportunities. However, development must be of the highest architectural quality.” (p. 49). Indicative massing is shown in Figure 3.4, which maps the LVMF viewing corridors and indicates building heights for selected sites within the EAP area.
3.47	Policy D2 Heritage , outlines LBC’s obligation to preserve listed buildings and preserve or enhance the character and appearance of conservation areas. LBC “will not permit the loss of or substantial harm to a designated heritage asset [...] unless it can be demonstrated that substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss”. In decision making, the Council will take into consideration the scale of the harm and the significance of the asset. The Council will also seek to preserve non-designated heritage assets including London Squares and those on and off the local list. The document notes that LBC has a general presumption in favour of retaining buildings that make a positive contribution to the character or appearance of a conservation area, whether they are listed or not, so as to preserve this character and appearance. The existing building on the Site is noted as a negative contributor to the Regent’s Canal Conservation Area. The document also states that Development will not be permitted which causes the loss of trees or garden space where this is important to the character and appearance of a conservation area..			3.52	The guidance on Building heights, massing and scale states that “A detailed view assessment should be conducted through the use of Accurate Visual Representation (AVR) that shows location of the proposed development and also illustrates the degree to which the development will be visible, its detailed form and the proposed use of materials. It should demonstrate that the proposal does not unacceptably impact on strategic and local views (including views from adjoining boroughs, such as those from Regent’s Park and views identified in the EAP Background Report), the character of the surrounding area including the settings of heritage assets (see English Heritage Guidance on the Setting of Heritage Assets, 2011), and that it contributes positively to the London skyline.” (p.49) and “Tall buildings should be designed to have a minimum impact on neighbouring properties and have a clearly defined relationship with the streets, buildings and uses around it.” (p.49).
	<i>London Borough of Camden: Euston Area Plan (Ref 1-7)</i>			3.53	The guidance on conserving and enhancing heritage assets on page 51 states that: “The London Borough of Camden and the Mayor of London will seek to ensure that new development in the Euston area is of excellent design quality and complements local character and scale whilst making the best possible use of land.” It notes that key heritage assets and issues, including areas of sensitivity and opportunities to enhance historic character, are identified for each character area in Section 4 of the EAP.
3.48	The Euston Area Plan (EAP) was adopted in January 2015 as a long term planning framework to guide transformational change in the area, focused around the redevelopment of Euston Station. The Regent’s Park Estate is defined as one of the character areas in the plan and this includes the Site. The Draft Euston Planning Brief (Ref 1.7B) published in January 2020 has been prepared to provide further guidance to the policies in the EAP, but it is more tightly focussed on Euston Station itself and its boundary does not include the Site.	3.50	The more detailed guidance on design states that: “Opportunities should also be taken to provide more active frontages where sites and buildings currently fail to address the street, both in terms of improved building design and, where appropriate, more active land uses that generate additional activity and overlooking of the street.” (p.48)	3.54	Section 4 of the guidance sets out context and development principles for each of the character areas. For the Regents Park Estate the following relevant points on context are noted: <ul style="list-style-type: none"> • An existing mix of building and unit types, set in landscaped space which creates a lack of clear definition between private space as well as building fronts and backs resulting in community safety issues; and • Regent’s Park, a designated Grade I Historic Park and Garden and part of a conservation area immediately to the west of the estate. The estate boundary along Albany Street is adjacent to the rear of nationally important heritage assets such as the Grade I Chester Terrace.

3.55 Development Principles EAP5: Regent's Park Estate includes the following design principles that are relevant to the Site:

- *“enhance the design and layout of the estate to make it easier to move around;*
- *provide overlooking and active frontages onto the streets to enhance community safety;*
- *[...]*
- *contribute towards improved wayfinding and access to Regent's Park; and*
- *create clear definition between public and private spaces.”*

3.56 Elaborating on these design principles, the guidance states: *“Building design: Buildings should have doors and windows overlooking the street and where appropriate, active frontages such as shop or community uses at ground level to enhance natural surveillance, perception of safety and encourage walking and cycling.”* (p.106)

3.57 The EAP is accompanied by the Euston Area Plan Background Report (Ref 1-7C), which provides the context for the EAP including key issues and existing policies and guidance which are relevant to the plan and its development, including further detail on built heritage urban design and views.

3.58 An EAP Historic Area Assessment (Ref 1-7A) was also published in October 2014 to provide a deeper understanding of the historical development of the Euston area to inform the production of the EAP. It identifies and describes character areas, assesses their relative architectural and historic importance and provides an evidence base for retaining areas of distinctive character. It examines the components of the historic environment and the relationships between them. It provides an overview of historic sensitivity within the Euston area on page 145-55. The areas of high, low and neutral sensitivity are mapped on page 155 and defined as:

- Areas of high sensitivity are those with a concentration of heritage assets, and/or a fine grained layout and small or medium scaled buildings. Their special qualities could be readily disturbed by demolition, erosion of features or inappropriate development.
- Areas of low sensitivity are those where significant change has already occurred, and where further development may be more readily accommodated or even desired.
- Neutral areas are those without a concentration of heritage assets but where the need for change may be less pressing.

The part of the Site on the corner of William Road and Stanhope Street is shown as an area of low sensitivity with the eastern wing of the site as neutral. The terrace of listed and unlisted buildings to the immediate south of the Site on Stanhope Street and the locally listed buildings at the eastern end of William Road are marked as areas of high historic sensitivity.



04

Baseline Conditions

Introduction

- 4.1 The urban development of London has resulted from a combination of careful foresight and planning, and a pragmatic, sometimes expedient response to opportunities and events. It is not the result of a comprehensive unified vision. Consequently, it is a city of many distinctive parts. These have combined to create a rich urban environment. Through complex interactions London's fabric has become highly stratified and is represented by a great variety of architectural styles and building types. These have been built over many centuries in response to changing opportunities, and to the expectations and demands of London's citizens.
- 4.2 Successive eras – Georgian, Victorian, Edwardian and Modern – have all added to the City's building stock within the existing framework of streets. Therefore, the City has not been defined physically by any single overriding architectural idea or stylistic era: its buildings and places are multi-layered palimpsest, having been constructed across the ages. This is key to appreciating the qualities of the City's urban character, and herein lies its potential for developmental flexibility and continued economic success into the future.

History of the Site and the surrounding area

- 4.3 The Blome and Strype map (1694-1720) shows Tottenham Court with a route north marked 'the way to Hamsted' on the alignment of Hampstead Road. In the area of Regent's Park, several enclosed fields are titled 'St Mary le Bon' and 'Marybone Park', all of which are to the immediate north of the orthogonal gridded street pattern of modern day Marylebone to the south. At the time of the production of Rocque's Map (1746) the built up area of London remained well to the south of the what is now Euston Road and the Site is within open fields.
- 4.4 The New Road (now Euston Road) was built in 1756, to drive livestock to Smithfield and until around 1800 it marked the northern edge of the built up area. Horwood's map of 1799 (Fig 4.1) shows the built up area already beginning to extend northward in the direction of the Site, by this date there is a ribbon of residential development fronting Hampstead Road and part of what is now Regent's Place has been developed. By 1828 and the publication of the Greenwood Map (Fig 4.2), the area around the Site had been comprehensively developed; William Road is shown clearly for the first time (marked as William Street, and Fredrick Street at its eastern end). Much of this part of Euston was developed as a

working class quarter to service the Nash's masterplan for an exclusive residential development within private parkland to the west, which was subsequently opened to the public as Regent's Park.

- 4.5 The first Ordnance Survey map of the area dating from 1876 (Fig 4.3) shows the street pattern and layout little changed from the Greenwood Map of 1828. Mary Street was renamed Stanhope Street in the 1860s. The Site formed part of an urban block, bound by Charles Street to the south, Hampstead Road to the east, Frederick Street to the north and Stanhope Street to the west. The OS Map shows a uniform terraces of modest residential buildings fronting Stanhope Street and William Street as part of a wider rectilinear layout of streets and squares. It was not just a residential area: the Goad Fire Insurance Map of 1887 details the businesses and industries within the local area, which included the Eagle Brewery, house furnishers, timber yards, public houses and warehouses, all within meters of the Site. The OS Maps of 1895 (Fig 4.4) and 1921 (Fig 4.5) show little change to the townscape on and around the Site.
- 4.6 During the Second World War and the post-war years that followed it, the area saw dramatic changes to the townscape, the largest since the area's inception. The LCC Bomb Damage Map (Fig 4.6) shows widespread bomb damage. There was some damage to the buildings in the urban block that includes the Site, with the large corner plot at the southern end of Stanhope Street and the centre of the urban block 'Damaged Beyond Repair' (purple and blast damage to the eastern end of William Road and Drummond Street and the terraces on Hampstead Road. Although undamaged, the terrace to the south of the site that includes the Lord Nelson public house and Nos 50 and 52 Stanhope Street (now all listed at Grade II) have been marked as a 'Clearance Area' (in green).
- 4.7 Slum clearance began in the area in the 1930s but the combination of Second World War bomb damage and continuing post-war clearance, instigated by the radical St Pancras Borough, prompted comprehensive redevelopment of an extensive area to the north and west of the Site in the 1950s which profoundly changed its townscape character as shown on the OS map of 1970 (Fig 4.7). The development of the Regent's Park Estate between 1951 and 1959 replaced the regular grid of 19th century terraced houses with larger scale, coarser grained layout. In the first phase (1951-53) north-east of Cumberland Market and east of Augustus Street are a number of eight storey, L-shaped blocks designed by Frederick Gibberd, with six storey blocks in Festival of Britain style, by St Pancras Borough Architect, T Sibthorpe to the west of Augustus Street. Phase 2 (1952-53) to the north of Robert Street, by architects Davies & Arnold, consists of plainly detailed tall slab blocks, typically of

11 storeys (the tallest in London at the time), combined with lower houses and reflected new thinking at the LCC for development at contrasting scales. The southern part of the estate (south of Robert Street) by Armstrong & McManus followed in 1957-59, with four-storey precincts of maisonettes in an interlocking layout. To reach the London County Council's standards for residential densities, two towers of 18 and 19 storeys were added to the masterplan. The various phases of rebuilding reflect changing post-war fashions in planning and architectural style. Pevsner describes it as 'a muddled story' with no overall plan followed (Ref 1-17, p.383).

- 4.8 The corner plot to the south at the junction of Stanhope Street and Drummond Street was rebuilt following bomb damage and is now locally listed. The western part of the Site was rebuilt during the 1960s with the poor quality two to six storey commercial block that currently defines the junction of William Road and Stanhope Street, replacing the northern end of the early 19th century terrace that survives in part to the south of the Site. Nos. 17-33 William Road were rebuilt in early 21st century with the existing seven-storey mixed use building.

- 4.9 To the south of Drummond Street early 19th century townscape was replaced after WWII damage by the Euston Centre, a speculative development of commercial blocks of varying heights, linked together by an upper level walkway, developed in stages between 1962 and 1972. The centrepiece of the development was the 37-storey Euston Tower designed by Sidney Kaye of Sidney Kaye, Eric Firmin and Partners and completed in 1969. Redevelopment of the Euston Centre began in the late 1980s and the development was renamed Regent's Place. The north-east quadrant of the Euston Centre to the north of the Euston Tower was replaced by the 16-storey commercial building, 10 Brock Street designed by Wilkinson Eyre and completed in 2013, and 20 and 30 Brock Street, which includes the 26-storey residential Triton Building on Drummond Street and mid-rise commercial buildings fronting Brock Street and Hampstead Road, designed by Stephen Marshall Architects and completed in 2013. To the west are the large footprint seven-storey commercial buildings 1 and 2 Triton Square designed by Arup Associates and Sheppard Robson and completed in 2000. Regent's Place now forms a distinct large scale modern commercial quarter between Euston Road and Drummond Street- Longford Street bounded by Hampstead Road to the east and Osnaburgh Street to the west.



Figure 4.1: Horwoods Map, 1799



Figure 4.3: OS Map, 1876

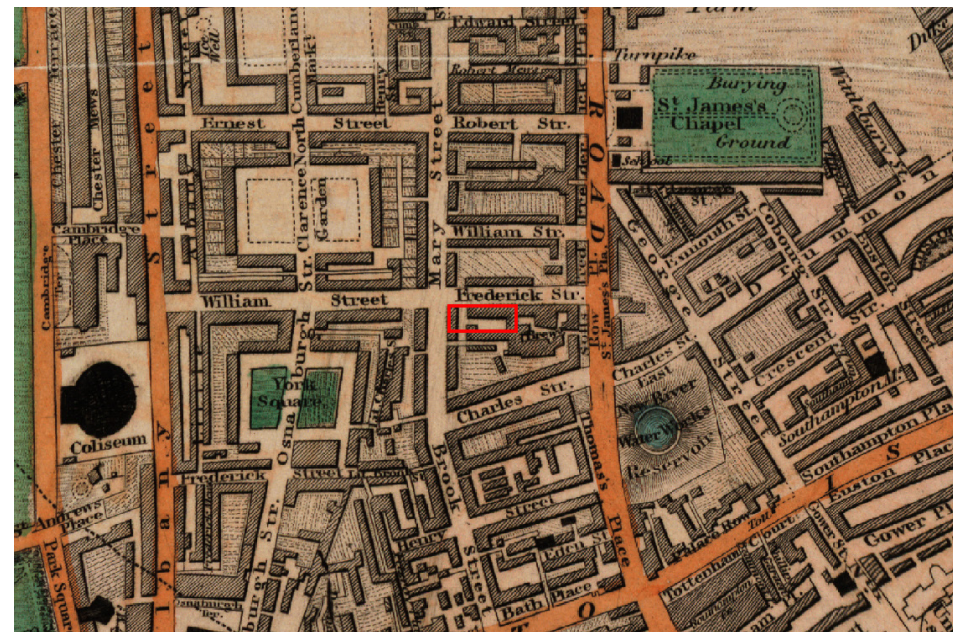


Figure 4.2: Greenwoods Map, 1828

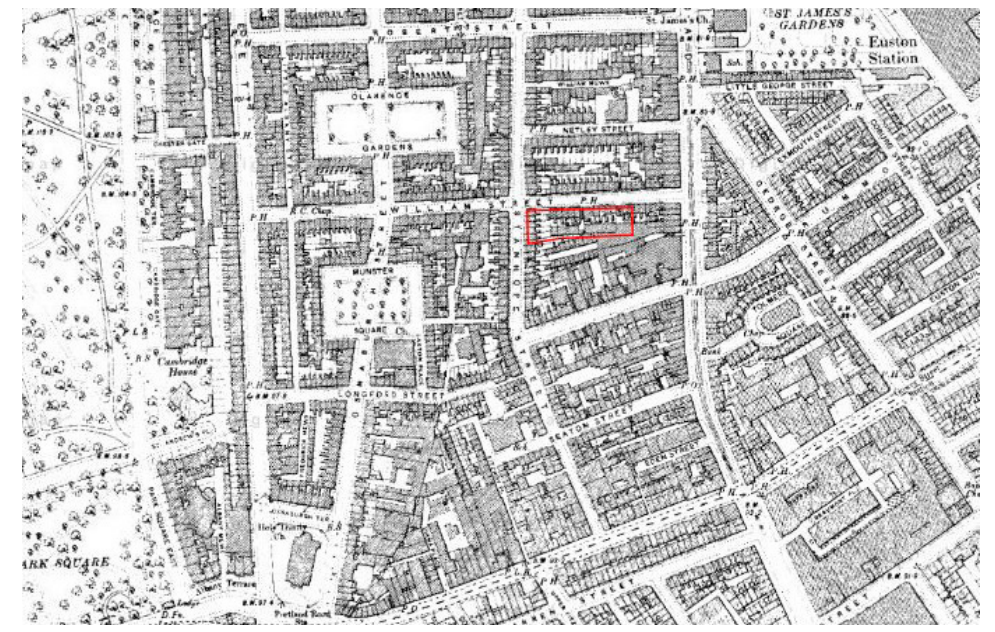


Figure 4.4: OS Map, 1896



Figure 4.5: OS Map, 1916



Figure 4.7: OS Map, 1970

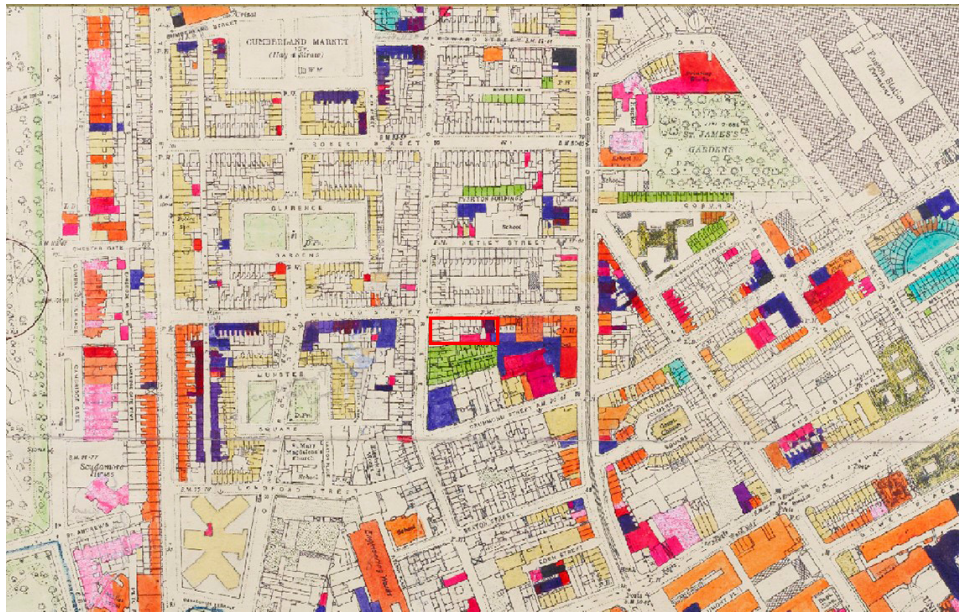


Figure 4.6: LCC Bomb Damage Map, 1945

BUILT HERITAGE BASELINE

Designated Heritage Assets

- 4.10 Nos.48-52 Stanhope Street form part of a short terrace close to the south of the Site and are considered as a group. These are described in paras.4.4-4.25. Other individual listed structures within the core built heritage study, have been described in Table 4.1. There are a number of locally listed buildings in the surrounding area; these are not assessed in Table 4.1 but are described in relation to the relevant views.
- 4.11 Although only a small part of the LBC Regent's Park Conservation Area would fall within the core built heritage study area, the TZVI demonstrates that there would be a wider potential visual impact on the Grade I listed landscape of Regents Park. Regents Park is sub-divided by the borough boundary between LBC and City of Westminster and therefore covered by two conservation areas. The park and its close setting within the designated conservation areas also includes a number of listed structures. As there is considerable visual interaction and group value, and to avoid repetition, the description of Regent's Park will cover all its various heritage designations including listed buildings where relevant to the potential effects of the proposed development. The TZVI in Appendix B demonstrates that there would be no likely visual impacts on the parts of the LBC conservation area to the east of Regent's Park or the parts of the CoW Regent's Park Conservation Area to the west of the park. Due to the distance of the Proposed Development from the park there would be no non-visual impacts. The baseline description therefore focusses on the landscape of the park itself.

4.12 The Bloomsbury and Fitzroy Square Conservation Areas are outside the core built heritage study area to the south-east and south respectively. As the TZVI in Appendix B demonstrates there would be no visual impact on their northerly settings. Due to the distance of the Proposed Development from the conservation areas there would be no non-visual impacts. These conservation areas have therefore been scoped out of the built heritage assessment.

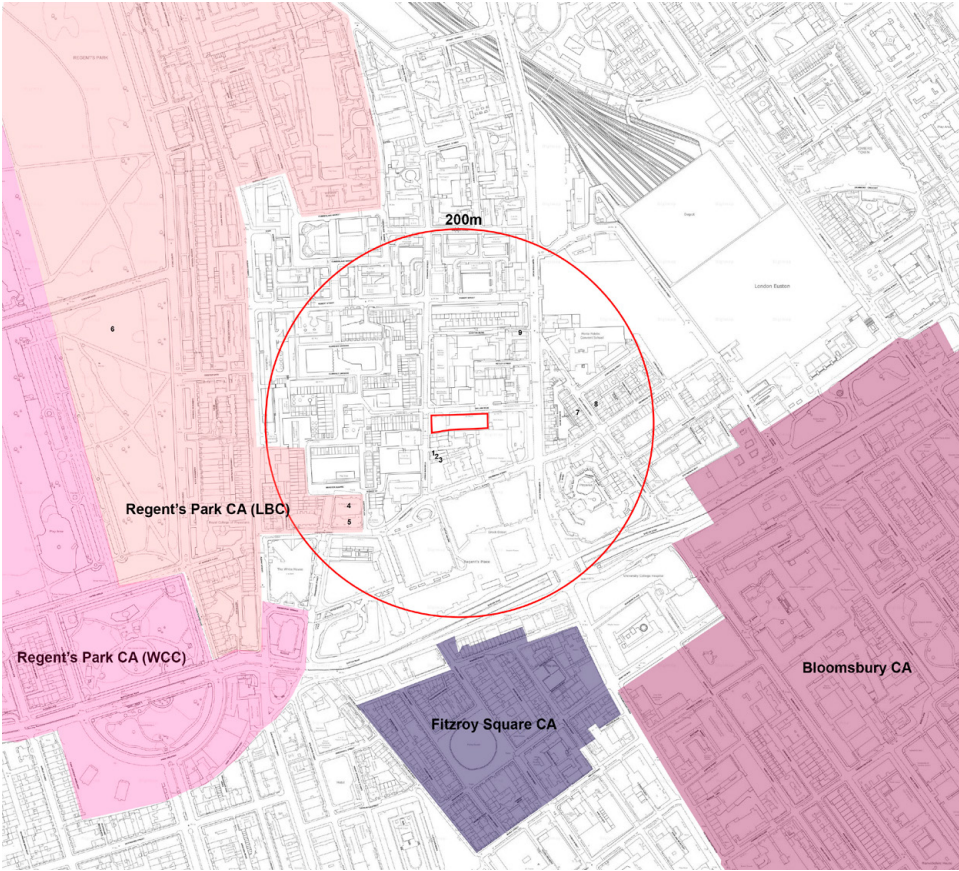


Figure 4.8: Conservation Areas

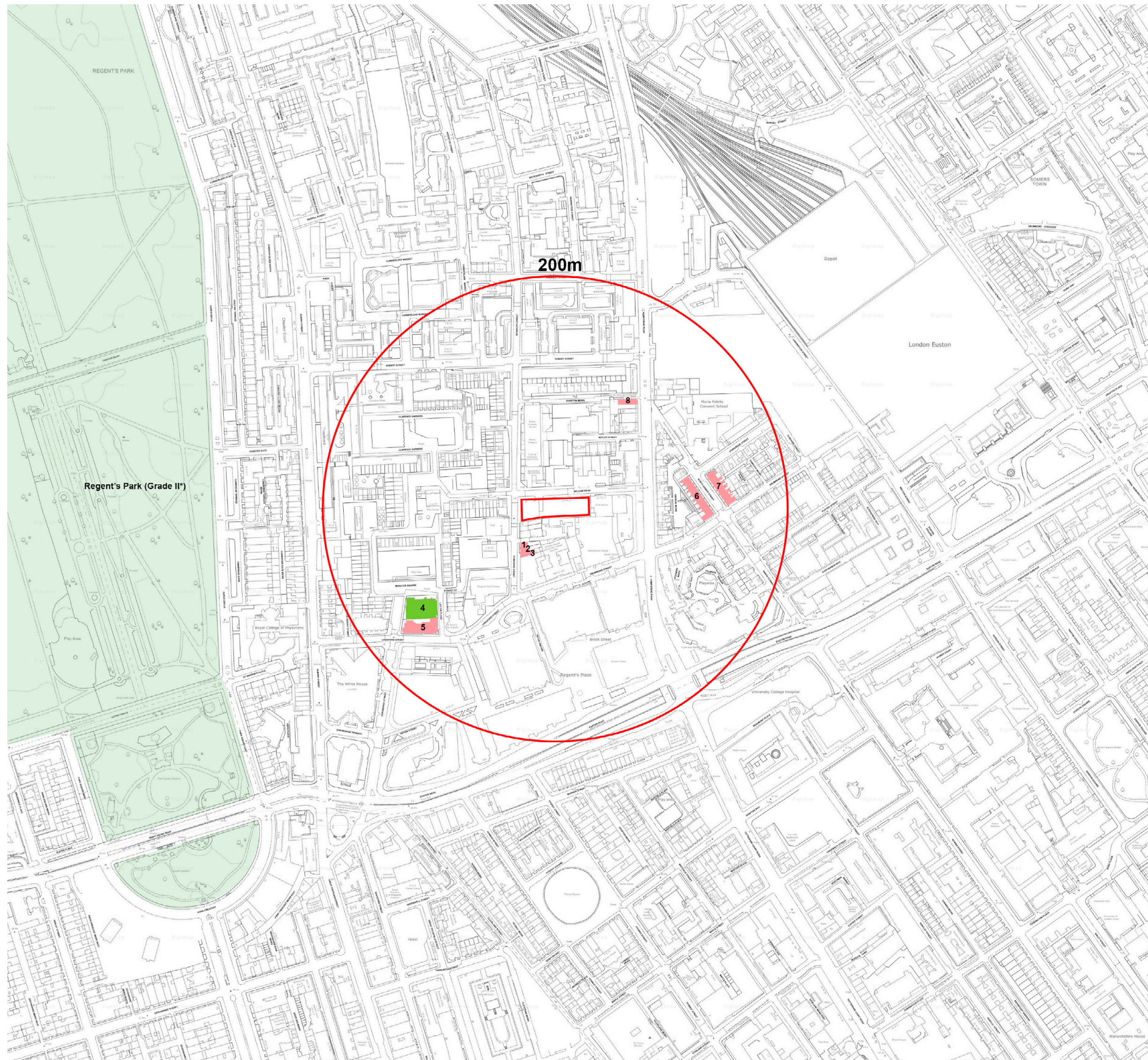


Figure 4.9: Listed Structures

Nos 48-52 Stanhope Street (Grade II)

History and description

- 4.13 Nos.50 and 52 Stanhope Street were built in around 1803 as part of a longer terrace of three-storey houses, which extended northwards to include the frontage of the Site to Stanhope Street. Stanhope Street was then called Mary Street until the 1860s. The houses pre-date John Nash's 1811 plan for Regent's Park, which reserved an area to the east of Albany Street for a working class quarter to serve the grand terraces fronting the park. The terrace formed part of the incremental northward development of housing for artisans and craftsmen following construction of the New Road (now Euston Road). It has not been built at the time of Horwood's map of 1799 (Fig 4.1) which shows that development north of the New Road has reached Drummond Street and also lines Hampstead Road; by Greenwood's map of 1828 (Fig 4.2) Regent's Park, the grand terraces to its east and the working class quarter to the east of Albany Street have been completed and residential development extends north of Robert Street. The modest quality of Nos.50 and 52 and their adjacency to the new market squares planned by Nash to the west of the Site resulted in their effective integration in this service neighbourhood, and the Booth Poverty map of 1886-1903 consequently shows that they were occupied by working class households with 'good ordinary earnings'.
- 4.14 Nos.50 and 52 are each three storeys plus basement with attached cast-iron railings with finials; each is two bays wide with a parapet concealing a butterfly or "London" roof, which is visible from the rear. Typical of Georgian housing the plots are long and narrow. Typically they have basements; all houses except the very poorest were built with basements and as is also common, the basement is within the made up ground that creates a raised street level on Stanhope Street but has windows on to the rear yard at the back.
- 4.15 No.50 is faced in stucco with a painted weatherboarded ground floor, infilling a wooden former shopfront with pilasters carrying entablature with dentil cornice. Its doorway is recessed with a blocked rectangular fanlight and wooden panelling. Upper windows have with recessed sashes and vermiculated keystones above. No.52 is in yellow stock brick. The front entrance has a round arched doorway with stucco impost blocks, a keystone, a blocked fanlight and a panelled door. The windows have recessed sashes with painted gauged brick arches above. A 1st floor sill band to No.52 aligns with the cornice of No.50. The interiors have not been inspected.
- 4.16 Constructed in 1899, the four-storey Lord Nelson public house replaced the original No.48 Stanhope Street of 1803, which formed part of the three-storey terrace with the surviving Nos.50-52. The original No.48 appears to have been completely rebuilt: although the ground floor aligns, above that the first floor is taller and the upper floors do not align. The pub is in red brick with a stucco ground and first floor and stucco dressings. At ground floor there is a recessed, wooden 20th century frontage flanked by pilasters supporting at 1st floor level panelled dado

and semi-circular window with an architraved lunette and keystone inscribed "Estab. 1803/rebuilt 1899". Above the cornice at 2nd floor level is inscribed "Ye Lord Nelson". At second floor are two segmental-arched, tow-light casements with keystones. Above a continuous sill band at third floor is a three-light casement with a scrolled surround and scrolled pediment with central feature surmounted by broken pediment. The address of the pub was listed as No.100 Mary Street until the 1861 census. The pub interior dates from the 20th century. The building has been significantly extended to the rear.



Figure 4.10: Stanhope Street, opposite Nos 48-52



Figure 4.11: No.48 Stanhope Street: The Lord Nelson

Heritage Significance

- 4.17 Nos. 48-52 have historic interest as a surviving fragment of the pre-existing 19th century townscape that was developed on what was the outer edge of London at the beginning of the 19th century, illustrating the growth and development of this part of London. The buildings have no known associations with important people or events.
- 4.18 Nos.50-52 have architectural interest in their embodiment of typical modest Georgian houses of the period. They are not considered to be significant or innovative examples of the type. As stated in the criteria for listing "from 1700 to 1850, most buildings that retain a significant proportion of their original fabric are likely to be regarded of special interest." (Ref 1.18). Therefore, as reasonably well-preserved early 19th century houses, the buildings will have been listed primarily for their age and rarity. They have no known association with an architect or particular builder, being typical of the pattern book designs prevalent in speculative residential housing of the period and have little special intrinsic architectural merit. The use of pattern books was common for even modest developments by the late 18th century. The Building Acts of 1707 and 1709 required party walls to rise 18 inches above the roof, and window frames to be recessed by four inches to reduce fire risk. This resulted in the general adoption of parapets, butterfly roofs and sash windows with recessed frames after this date and the arrival of the characteristic appearance of the Georgian house. The Building Act of 1774 further regulated construction of urban and suburban houses in the 18th and 19th centuries standardising the quality and construction of buildings and making the exterior of a building as fire-proof as possible. The Act consolidated previous regulations and further restricted any superfluous exterior timber ornamentation, except for door frames and shop fronts. Window joinery which previous Acts had already pushed back from the wall face was now concealed in recesses behind. As a result of the 1774 Act, later Georgian terraces like Nos.50-52 are generally more austere; what is lost in the detailing is made up for in the syncopation of repetition along a terrace – John Summerson describes the "insistent verticality of the London House" (Ref 1-19) – however because only a fragment of two houses from the original remains, this feature of the streetscape can no longer be appreciated. The Building Act of 1774 also categorised or 'rated' houses according to value and floor area from the smartest first rate houses of grand scale and the finest quality down to the smallest plainest fourth rate houses. Based on their scale and simplicity Nos 50-52 would likely have been classified as fourth rate houses.
- 4.19 No 48 Stanhope Street, the Lord Nelson pub, has architectural significance for its flamboyant eclectic exterior. The first public houses were ordinary houses that happened to have rooms that were opened to the public for the consumption of drink. Distinctive public house architecture began to emerge during the 19th century and culminated in the great boom of pub building at the turn of the 20th century. The main purpose of the public house exterior was to attract the attention of the passers-by and distinguish the public house from the private house to attract customers

in. Pubs embodied popular commercial architecture; public houses were essentially working class and during the 19th century their architecture both externally and internally offered an exotic or flashy conviviality in contrast to the drab, harsh reality of the everyday life of the majority of their customers. Because of an increasing difficulty in obtaining new licences towards the end of the 19th century, breweries bought up independent pubs; many old pubs were rebuilt or refitted in grand style as a result and competition between them was fierce. The exterior of a pub was effectively an advertisement and, as well as pub signage seen at closer range, elaborate, often taller, frontages, were methods of marking the difference in use of the public house from a further distance. Pub design tended not to be at the cutting edge of architectural style. Stylistic waves that influenced Victorian design more widely were adapted and reached the architecture of public houses a few years later "mixing motifs with completer disregard of historical scholarship, and to infuse the result with the aggressive qualities of 'vigour' and 'go' " (Ref 1-26). The HE listing Guide describes the decades either side of 1900 as "The high point of pub building" (Ref 1-20, p.12). Towards the end of the 19th century Queen Anne and Flemish styles of pub design were popular choices and are especially well represented in the golden age of the 1890s. The Lord Nelson is a fine example of a late Victorian urban public house. A pub had existed at No.48 since the terrace was constructed in 1803 and may well have been rebuilt in 1899 by a new owner to create a more prominent eye-catching presence, with the abundance of fashionable high Victorian ornament in the front elevation to Stanhope Street, which was raised by a storey above the existing early 19th century terrace. The additional storey and eclectic late Victorian motifs in the facade mark out as No.48 as distinctly different in use from the private houses in the remainder of the terrace and, until the post-war redevelopment of its setting, it would have effectively punctuated the regularity of the early 19th century streetscape. In a more varied modern streetscape it may no longer be the most eye catching building on the street but its visual distinction can still be appreciated to an extent in relation to its close street setting.

- 4.20 The listing descriptions (Ref 1-25) are brief and do not describe the heritage significance of the listed buildings; these are included in Appendix C. The buildings are not described in Pevsner's The Buildings of England. (Ref 1.17)

Setting and its contribution to the appreciation of heritage significance; resulting susceptibility and sensitivity to change

- 4.21 To the south of No.48 is Nos.40-46 Stanhope Street, a substantial locally listed warehouse partly dating from early 20th century but largely rebuilt in a complementary form in the mid 20th century following bomb damage. This rises taller than No.48 and provides a strong bookend to the streetscape. To the north of No.52, the terrace is continued by a mixture of plainly detailed unremarkable modern neo-Georgian infill of three and four storeys at Nos. 54 and 56 Stanhope Street. Further to the north Nos.58 and 60 are not listed or locally listed but appear to be much altered remnants of the same early 19th century terrace as Nos.50

and 52 Stanhope Street: both have basements, both have a sill band below the first floor windows which matches that of No.52 and gauged brickwork above the second floor windows. The houses have both been extended by a floor and their elevations simplified by applied render to ground and first floor. There is significant cracking apparent above the first floor windows. To the north at the junction with William Road is the post-war office building that occupies part of the Site with a utilitarian inactive poor quality two storey frontage at the corner and a taller six storey element is brick work set well back from Stanhope Street. The listed buildings and their immediate neighbours form a relatively coherent stretch of streetscape of varying quality that is seen within the wider setting of Regents Place to the south, the post-war Regents Park Estate to the west and north-west and a wide mix of buildings to the east. To their west in the interior of the urban block is a private yard and four to seven storey modern student housing blocks accessed from Drummond Street.

4.22 Regent's Place to the south of Drummond Street is a contrasting townscape of tall and midrise late 20th and early 21st century, generally commercial development which forms a large scale coarse grained backdrop to the listed buildings seen from the north. The southerly setting includes the Euston Tower, Triton Building and 10 Brock Street at 37, 26 and 16 storeys respectively seen in the close backdrop to the listed buildings at a distance of approximately 50m. The Regent's Park Estate replaced early 19th century development around Munster Square and Clarence Gardens, which would have originally set the listed buildings within a wider area of regular modest Georgian terraces to both sides of Stanhope Street. The later phase of the Regent's Park Estate that replaced it after WWII dates from 1957-59, with four-storey precincts of maisonettes in an interlocking layout and two towers of 18 and 19 storeys. The townscape of the estate is characterised by a coarse grain and lack of legibility with poorly defined streets and a lack of clarity between fronts and backs. Street trees soften and screen the surroundings in some locations. The 19 storey Bucklebury tower opposite the listed buildings, approximately 25m to the west, is set back from the street behind a low inactive podium; the quality of the west side of Stanhope Street is streetscape opposite the listed buildings is of very poor architectural and public realm quality. To the north-east, William Road at the junction with Stanhope Street is characterised by unremarkable early 20th century development including the existing 17-33 William Road on the Site and the red brick eight storey Netley Building. Further east on William Road towards the junction with Hampstead Road are locally listed buildings: Hampstead House, a mansion block on the north side dating from the late 19th century and Nos 7-15 William Road a commercial building, opposite on the south side dating from the early 20th century, which have no visual, historic or functional relationship to the listed buildings on Stanhope Street.

4.23 The immediate setting of the listed buildings to the north and south on Stanhope Street contributes to a neutral but relatively coherent stretch of streetscape between No.40 and No.56 Stanhope Street of equivalent scale and similar materiality. This close setting on the east side of

Stanhope Street while it is not all of high architectural quality and not all contemporary with the listed buildings does make some contribution to the appreciation of the heritage significance of the listed buildings through its similar scale and material palette that provides a neutral buffer between the listed buildings and the surrounding more varied, generally coarser grained taller and contrasting townscape of the wider setting. Beyond this close setting on the east side of Stanhope Street the contrasting modern townscape of larger taller buildings and coarser grained townscape is clearly apparent. The contrast highlights the fine grain and historic character of the listed buildings but the modern setting is not judged to make any material contribution to the appreciation of the heritage significance of the listed buildings.

4.24 The loss of the remainder of the terrace to the north and south and in the wider area more generally has to an extent reduced the ability to appreciate their heritage significance as part of a wider area of early 19th century late Georgian townscape. However, Nos 48-52 were listed in 1974 after construction of the Regent's Park Estate and the Euston Centre. Therefore it is concluded that the heritage significance of the buildings can be appreciated much as it was when they were listed, despite the contrasting character of much of the setting, and despite its proximity and visibility in the backdrop of some views of the listed buildings. The modern setting makes little or no contribution to the ability to appreciate the heritage significance of the listed buildings.

4.25 The value of the listed buildings as nationally designated heritage assets, as advised by HE should be considered to be **high**. Because their setting beyond the immediate streetscape neighbours is characterised by coarse gained, taller contrasting modern development their susceptibility to further change in their settings is assessed to be low and not likely to impact further on the ability to appreciate their heritage significance. Combining the judgements of value and susceptibility to change with equal weighting results in a medium sensitivity.

Value: **High**
Susceptibility to change in setting: **Low**
Sensitivity: **Medium**

Regent's Park (Grade I)

Regent's Park heritage designations and guidance

4.26 The landscape of Regents Park was added to the HE list of Registered Parks and Gardens in 1987. The designation covers the landscape of Regent's Park within both boroughs and includes Park Square Gardens and Crescent Gardens to the south-east. The listing description dates from 2000 and was last amended in August 2020.

4.27 The LBC Regent's Park Conservation Area was designated in 1969 and its Appraisal and Management Strategy (Ref 1-21) was adopted in July 2011; it was extended to include the church of St Mary Magdalene in 1985. The conservation area covers the eastern edge of the Regent's Park, to the east of the Broad Walk, and the residential area to the east of park that includes the Grade I listed Nash Terraces facing the park, the Grade I listed Royal College of Physicians (Denys Lasdun and Partners 1960-4) and the Park Villages planned by Nash as a 'garden suburb'. It includes the Grade II* listed Church of St Mary Magdelene, which is separately assessed in Table 4.1. The TZVI in Appendix B demonstrates that there would be no likely visual impacts on the parts of the LBC conservation area to the east of Regent's Park; the baseline description therefore focuses on the park itself.

4.28 The CoW Regent's Park Conservation Area was designated in 1969 and a Conservation Area Directory was published in 1968 (Ref 1-22). A brief General Information Leaflet (Ref 1-22A) was published in 2004. The conservation area covers the landscape of Regent's Park to the west of the Broad Walk, buildings between the Outer Circle and Park Road to the west of the Park and townscape to the south and south-east of the Park that includes Park Square and Park Crescent, the Grade I listed Holy Trinity Church and the Grade II listed Great Portland Street Underground Station. The TZVI in Appendix B demonstrates that there would be no likely visual impacts on the parts of the CoW conservation area to the west of the park or to the south-east of Park Square; the baseline description therefore focuses on the park itself.

4.29 The Regent's Park and Primrose Hill Conservation Management Plan (updated 2015) prepared by The Royal Parks (Ref 1-23) provides further information on the heritage context, character and heritage significance of the park.

History

4.30 Marylebone Park, later renamed The Regent's Park, was formerly part of the manor of Marylebone, held by the nunnery of Barking. In the 16th century, the land passed to the Crown and was enclosed as a deer park. During the 18th century the area was leased as farm land by the Duke of Portland, reverting to the Crown in 1811. To the south of the park, Portland Place was developed from 1776 onwards by the Adam brothers originally intended to be an exclusive enclave out of the city. Its orientation, north to south, would later form a ceremonial route from Oxford Circus to the park. Later, a grid of streets planned by John Fordyce was built

around Portland Place in 1783. By 1809, the Duke of Portland published a plan to show a landscaped park with villas and terraces north of the Marylebone Road on farmland that was owned by the King and would form part of the Regent's Park. In 1811, John Nash won a competition to be the Prince Regent's architect; his proposal produced in March 1811, was for a private residential estate set in parkland surrounded by grand inward-facing terraces, and was strongly influenced by the work of Humphry Repton, with whom he had worked between 1795 and 1802. Nash's design included the park in a grand scheme to create a new processional route through London from Carlton House, north along Regent Street and Portland Place to Regent's Park.

4.31 Regent's Park and its surrounding buildings took 21 years to construct. Work began in 1811 with planting as well as excavations for the lake and ground modelling and continued until 1832 – with the design continuing to evolve during this period. The original intention shown by Nash's plan of 1811, was for a residential estate set in private parkland. The original intended focus of the scheme, a large central double circus of houses, the Great Circus and the Inner Circus was omitted, and the forty villas shown on the 1811 plan were reduced to eight by 1827. The extensive water network shown in the original plans was restricted to the implementation of the ornamental lake and the Regent's Canal at the northern edge. The emerging park lacked formal structure, consisting of large areas of sweeping lawns and open grazing land, punctuated by scattered trees, and groups of trees planted to screen the villas which had never been constructed. Only one formal avenue of trees: Broad Walk Avenue, was created. This ran between Park Square and Chester Road connecting to the Inner Circle which been reduced to a single circus without the proposed enclosing terraces. Even before completion of the park there had been considerable pressure from the public for access to the parkland and in the 1830s Nash was asked by the park Commissioners to review public access to the park: in response he extended the Broad Walk northwards, and from 1835 the park progressively opened to the public. Later additions to the Broad Walk included lodges, a bandstand and shelter, drinking fountains and numerous seats. Such public amenities continued to be created in response to demand and the public area of Regent's Park was expanded along the eastern and western sides. Features and amenities began to extend beyond the Broad Walk including ornamental planting around entrances, sports fields centred upon the timber Prince's Pavilion and provision of toilet facilities and refreshment kiosks.

Description

4.32 The 147 hectares of Regent's Park slope gently to the south and is largely enclosed by the highway of the Outer Circle. Regent's Park is largely laid to grass, much of which is set aside for recreational sports. A number of tarmacked paths which radiate from the entrances and from points within the site, cut across the grass. The most significant and widest of these is the Broad Walk. Marking the boundary between Camden and Westminster, the Broad Walk passes over the Grand Union Canal at its northern end, then runs south from the Outer Circle. To the

west of the Broad Walk at its northern end is the triangular site of the Zoological Gardens. After c 500m the walk divides around an ornate marble and granite drinking fountain dating from 1896, (listed grade II) before continuing for a further c 500m where it is crossed by Chester Road, which leads west to the Inner Circle and east to the Grade I listed Chester Terrace. The final section of the walk runs through the formal Italian Garden. Created in 1864 by William A Nesfield, at the direction of Prince Albert, the Garden had become grassed over by the late C20. By the 1990s proposals were in hand to restore both the Italian Garden and the informal English Garden to the east, the English Garden having been made at around the same time by Nesfield's son Markham, who used mounded grass and planting to create informal glades. The restoration of the Italian Garden was completed in 1996; the renewal of planting in the English Garden is (2000) ongoing. The Broad Walk is lined with trees screening views of tall development at to the south-east of the park.

4.33 Within the Inner Circle are Queen Mary's Gardens. Within the Inner Circle a central path leads north from ornamental gates (listed grade II), erected to commemorate King George V and Queen Mary's Jubilee in 1935, to a pool and fountain (listed grade II). To the north-west is the open-air theatre and café. Two sets of heavily gilded gates decorate the entrances to the gardens. The eastern gates, from Chester Road, were provided by Sigismund Goetze, a wealthy local artist, in 1932. On the south-west side of the park to the west of the Inner Circle is the Boating Lake a Y-shaped lake with a number of islands, The east and west arms of the lake are crossed by ornamental footbridges, the southern arm being crossed by York Bridge (listed grade II) which carries cars between the Outer and Inner Circle. In 1930 a small children's boating pool was added c 50m to the west of the western arm of the lake.

4.34 The few recent additions to Regent's Park include the London Central Mosque by Sir Frederick Gibberd, Sir Denys Lasdun's Royal College of Physicians and, more recently, three classical villas by Quinlan Terry.

Heritage Significance

4.35 Regent's Park is a significant, large, piece of open public space within central London. Its long associations with the monarchy and more recently the expansion of London contributes to its significance. This is further enhanced through the relationships with John Nash whose vision it was to terminate a route through London with an exclusive enclave of houses and open landscape. The landscape was intended to be naturalistic, as though it was a piece of countryside or landscaped park belonging to a country house, which Nash had learnt through his professional acquaintance with Humphry Repton.

4.36 The HE listing description provides the following summary of heritage significance:
"Regent's Park is included on the Register of Historic Parks and Gardens for the following principal reasons:

- 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 C19;
- for the specific interest of some of its designed landscape elements such as WA Nesfield's Italian Garden of 1864 and the near-contemporary English Garden by his son Markham;
- as the setting for a large number of listed structures within it including early C19 villas and those of the Zoological Gardens, and the surrounding terraces"

4.37 The LBC Regents Park CAA described the special character of the LBC conservation area as follows:

"The Regent's Park Conservation Area covers the eastern segment of John Nash's early 19th century Regent's Park development. It is a small part of a greater scheme that extends to the west into the City of Westminster, and comprises a unique planned composition of landscape and buildings, at once classical and picturesque.

The significance of the Regent's Park area is of national and international importance. The comprehensive masterplanning of the park, terraces, villas and the (largely redeveloped, but still appreciable in plan form) working market and service area served by canal to the east was on an unprecedented scale of urban design in London. The integration of all elements of a living area, from aristocrat to worker, from decorative to utilitarian, in a single coherent scheme were exhibited here.

On approaching the conservation area from the Park the terraces emerge over the trees; here is the city in the country. On approaching from the south Regent's Park is the culmination of Regent's Street, Portland Place and the wineglass shape of Park Square; here is the country in the city. Park Village East and Park Village West are picturesque precedents for the small suburban villa, closely set in a variety of styles that were to become so popular with the Victorians.

The service area, whilst largely redeveloped in the 20th century, is preserved in the layout of later development, and the physical remains of the canal and basin to the east of Albany Street.

Control over development has been in place from the start when the concept of Regent's Park development was established after a design competition; after which John Nash sold building leases for approved designs." (p.5)

4.38 The Primrose Hill and Regents Park 2015 Management Plan (Ref 1-23) includes a Statement of Significance from which the following excerpts are relevant:

"Regent's Park and Primrose Hill are individually and collectively highly valued by many people (over eight million visitors a year). Their prime

significance is due to their:

- *Internationally renowned historic landscape (recognised in numerous national historic and landscape designations including the Grade 1 listing of Regent’s Park on the English Heritage Register of Parks and Gardens and the presence of several listed buildings);*
- *Royal origin and connections (from Marylebone Park and the Prince Regent to Queen Mary and The Royal Parks);*
- *Grand and elegant early nineteenth century design by John Nash with Regency terraces and villas, set around and within a spacious picturesque parkland.*
- *Later design layers such as the Avenue Gardens, English Gardens, Queen Mary’s Gardens and associations with ZSL London Zoo, which are all now important historic features in their own right: distinctive character areas within the park, supported with intentionally differentiated furniture.*
- *Large number of high quality sculptures and artefacts that enrich the visual quality and intimacy of the parkland landscape without cluttering it.*
- *Historically important intervisibility between the Nash terraces and the historic parkland; important internal views over the Ornamental Water, Queen Mary’s Gardens, and key Broad Walk vista; and the contrasting characters between the refined ambience of Regent’s Park with the naturalistic landscape of Primrose Hill, with its panoramic views over the city of London, St Paul’s Cathedral and Westminster Abbey that are protected by statute.*
- *Importance as a formal and informal public recreational landscape, including children’s play, with extensive provision for many sports (including football, rugby, cricket, softball and tennis”*

Setting and its contribution to the appreciation of heritage significance; resulting susceptibility and sensitivity to change

- 4.39
- Beyond the perimeter of the park, modern tall buildings are a clearly legible aspect of the setting to the south-east, signifying the park’s location in the heart of the modern city. The potential visibility of development on the Site and the impact of any visibility of key views from the park or on the visible setting of the park is the key aspect of setting that will be considered in the assessment; due to its scale and distance from the park, development on the Site would not affect other aspects of the parks setting.
- 4.40
- The LBC CAA (Ref 1-21) identifies key views, emphasising the relationship of city to green space and states “The park and buildings are such a complete and integrated composition, handled with absolute

thoroughness, that all views from within the park have significance.” (Ref 1.X p.19). Noted views of relevance to this assessment include:

- *“Chester Terrace from Chester Road and from Chester Place”*
- *“From the Park to the Terraces seeing a clear roofline (without buildings in the background)”*

- 4.41
- The Regents Park with Primrose Hill Management Plan notes that the visual character of the park is dependant on the quality and nature of views including views from Regent’s park “The historic terraces bordering the park and the villas within the park are integral to the design and layout of the park. The majority of views from the park are truncated by buildings: for the most part historic views of the elegant terraces as Nash intended... Some of these are also being adversely affected by views to tall modern buildings located behind the terraces, such as at Sussex Place... ” (Ref 1.23, p.73). Figure 16 in the plan shows key historic and modern views; of relevance to this assessment is the historic intervis- ibility between the park and the historic terraces to the east, south and west of the park, which makes a contribution to the appreciation of the heritage significance of the listed landscape.
- 4.42
- The value of the listed landscape and its associated conservation areas and listed structures as nationally designated heritage assets, as advised by HE should be considered to be **high**. Because thee setting beyond the immediate park enclosure in the area of the Site is characterised by a cluster of taller contrasting modern development the susceptibility to further change in this part of the setting is assessed to be medium and minor changes to its composition or quality are not likely to impact further on the ability to appreciate heritage significance. Combining the judgements of value and susceptibility to change with equal weighting results in a medium sensitivity.

Value: **High**
Susceptibility to change: **Medium**
Sensitivity: **Medium to high**

Table 4.1: Baseline assessment of listed structures

Ref	Listed structure	Summary History and description	Heritage Significance	Setting and its contribution to the appreciation of heritage significance; resulting susceptibility and sensitivity to change
1	No.52 Stanhope Street Grade II	Refer to paragraphs 4.13-4.25		
2	No.50 Stanhope Street Grade II	Refer to paragraphs 4.13-4.25		
3	Lord Nelson Public House (No.48 Stanhope Street) Grade II	Refer to paragraphs 4.13-4.25		
4	Church of St Mary Magdalene Grade II*	Built between 1849 and 1852 by R. C. Carpenter with later alterations by the same architect in 1866-7 and a crypt added in 1883-4. The building is constructed from snecked Kentish ragstone with Bath stone dressings. It has a tiled pitched roof with ornamental ridge tiles. The church is large, with a six-bay nave with two aisles on the interior. The building is highly ornamental, with an octagonal bell turret terminating in gabled louvres under a conical roof with finial. The aisles are defined by buttresses with traceried windows. The east window is of particular interest being one of Pugin's last designs before his death. Further windows include two memorial windows to Sir Edward Hall Anderson (1857) by Clayton and Bell, under the supervision of William Butterfield.	Architectural and historic interest: The plan of the church with its nearly equal nave, aisles and intended tall tower, together with the English Gothic Revival style, are of the influence of Pugin. On its consecration in 1852, the magazine the Ecclesiologist described the church as “the most artistically correct new church yet consecrated in London”; Norman Shaw worshipped here for 42 years and described the church as the “beau ideal of a town church”. The church has associations with both Pugin and Butterfield in both its design and the windows attributed to their hands. Richard Cromwell Carpenter was a prolific English architect chiefly known for his ecclesiastical work and association with Anglo-Catholicism; a large number of his new church designs and restorations are listed; St Mary Magdalene is considered to be one of his finest works; the N aisle and N chapel were added by his son.	The immediate setting has changed significantly since the church's inception when Euston was on the edge of the rapidly expanding London. On its completion, the building was described as a “town church”, rather than one in the centre of a city. The setting of the church changed dramatically in the second half of the C20: the modest stucco cottages that lined Munster Square to the north were bomb damaged in WWII and redeveloped as part of the Regent's Park Estate in 1957-59 with four-storey precincts of maisonettes designed by Armstrong & McManus; the 19 and 18 storey towers Bucklebury and The Combe are located just outside the square. From the eastern side of the church and school, the Euston Tower and BT Towers are visible to the SE. The church was listed in 1954 prior to the redevelopment of Muster Square. The loss of the contemporary early C19 townscape setting of the church has reduced the ability to appreciate its heritage significance within its original C19 setting. The church and school form a group with a functional historic relationship that contributes to the heritage significance of both buildings. Built to serve the new working class quarter proposed as part of Nash's masterplan for Regent's Park and its environs the church and school have a historic relationship to the Park and Nash Terraces to the west and are included on the edge of the LBC Regent's Park CA. The predominantly post-war setting to the N, S and E however makes no material contribution to the appreciation of heritage significance. Given the existing character of the setting to the E and its lack of contribution to the appreciation of heritage significance, the susceptibility of the setting to additional modern development of the scale and form proposed on the Site is low. Value: high Susceptibility of setting: low Sensitivity: Medium
5	St Mary Magdalene School Grade II	A school associated with the neighbouring church of the same name, designed by Philip Robson, and dating from 1901. The building is built with Art Nouveau and Queen Anne influences, with red brick and stone dressings detailing the façade. It is two storeys with a semi-basement. It is three windows wide, with the entrance to the left, with a full height canted oriel window above. Other details include cast-iron balustrades in an Art Nouveau style. The school has a modern red brick extension to the east	Architectural and historic interest: It has architectural interest in its successful fusion of what was at the time contemporary and historically imagined designs. There is a historic and functional relationship to the Grade II* listed church and the two buildings form a pocket of historic townscape in an otherwise post-war and C21 townscape.	

Ref	Listed structure	Summary History and description	Heritage Significance	Setting and its contribution to the appreciation of heritage significance; resulting susceptibility and sensitivity to change
6	Nos.211-229 North Gower Street Grade II	Nos.211-229 North Gower Street is a terrace of 10 four-storey, two bay Regency houses with basements dating from the early C19. The houses are constructed in yellow stock brick with incised stucco to the ground floors that gives a rusticated appearance. The round-arched doorways have fanlights; Nos.211 and 213 have arched ground floor windows; above ground floor window openings have gauged brick flat arches; the first floors have cast iron balconies (except No 211).The attached cast-iron railings enclosing basement areas have acorn finials. All except No.211 have had their original ‘London’ roofs replaced with modern flat roofs.	Architectural and historic interest: Although the N end of Nos. 211-229 (Nos.231-233) has been lost, both terraces contribute to what Pevsner describes as a “surprisingly complete residential area built up by the Southampton Estate c.1820 with modest terraces and small shops” (Ref 1-17, p.378). Both terraces have historic interest in illustrating the growth and development of the Southampton Estate in the Euston Area in the early C19. Both terraces have architectural interest in their embodiment of typical modest third rate pattern book Georgian houses of the period. The houses are plainly detailed but elegantly proportioned. They are not considered to be significant or innovative examples of the type. They retain a significant proportion of their original fabric and, dating from earlier than 1850, the buildings will have been listed primarily for their age and rarity and their group value with each other and other terraces and partial terraces to the S, also GII listed, and on Drummond Street to the east, parts of which are GII listed.	The terraces are not within a conservation area. The terraces are seen as part of a relatively complete section of Regency streetscape in views up and down North Gower Street towards or from the terraces, in which the vertical rhythm of the street and the repetition of the individual houses that form the terrace can be appreciated; and this contributes to the appreciation of their heritage significance. The individual houses are also appreciated in close street views that allow the proportions and detail of the elevations to be appreciated. Regency terraces do not survive on Starcross Street, with the exception of the return to No 204. The view from Starcross Street towards the northern end of Nos.211-299 is terminated also by the post-war redevelopment of Nos.231-233. The 26-storey Triton Building is approximately 140m to the SW of the terraces with the 37-storey Euston Tower approximately 180m to the SW. Both buildings are visible in views of Nos.211-229 from Starcross Street. Views from Starcross Street are therefore judged to be incidental, making no real contribution to the appreciation of the heritage significance of the terraces in comparison to more significant views along North Gower Street. Drummond Street retains something of its historic character and views towards the S end of Nos.211-229 also contribute to the appreciation of the heritage significance of the terraces as part of a wider area of Regency townscape. The Triton Building and Euston Tower are prominently visible in westerly views from Drummond Street. Tall buildings contrast with the historic townscape but do not interrupt the historic streetscape of North Gower Street or Drummond Street prevent the appreciation of the interrelationships of the various terraces and listed buildings. The backdrop of Nos.211-229 is already characterised by tall buildings to the W in longer views. Further tall buildings in the wider setting to the W would not alter the taller modern character of the W setting and would not impact on the most significant views up and down North Gower Street; susceptibility to change of the setting of the listed buildings to development of the scale proposed in the area of the Site is therefore low. Value: high Susceptibility of setting: low Sensitivity: Medium
7	The North Gower Hotel (Nos.190-198) and Nos.200-204 Grade II	Nos.190-198 is a terrace of 8 four-storey two bay Regency houses with basements dating from the early C19, built by I Bryant. The houses are constructed in multi-coloured stock brick with incised stucco to the ground floors that gives a rusticated appearance. The round-arched doorways have fanlights and there is a mixture of round and square headed windows at ground floor level; above ground floor window openings have gauged brick flat arches; the first floors have cast iron balconies (except No.204).The attached cast-iron railings enclosing basement areas have acorn and spear head finials. All retain a butterfly ‘London’ roof form. Number 204 fronts North Gower Street, but to Starcross Street has a three bay return with a round headed door and blind windows above. Nos.20-204 have taller floor to floor heights and a higher parapet than the remainder of the terrace.		
8	Prince of Wales Public House, Hampstead Road Grade II	The Prince of Wales is a public house located at the corner of Prince of Wales passage and Hampstead Road. There has been a pub in this location since at least 1807. The current building was constructed in the mid-1860s from stock brick, with stucco bands and dressings. The building is four bays wide with sash windows punctuating architraved surrounds and pilasters to each side articulating the verticals in the elevation. At ground floor there is projecting ground floor bar to Hampstead Road with a carriage entrance to its north. The building is topped out by a slate roof and party wall stacks to create a distinctive roofline. These pilasters rise to visually support a curved pediment with the Prince of Wales’ feathers central to the piece. On the first floor, there is a large projecting bow supported by a cornice line below which extends to the right and over the original carriage entrance which remains.	Architectural and historic interest: the public house has historic interest in illustrating the growth and development of the Euston Area in the C19. It retains an original carriage entrance, evidence of its use as a coaching inn on this major route into London from the north. The pub has architectural interest, and is noted for its interior, which the list description refers to as being a “ <i>remarkable survival... Included as an example of a mid-C19 public house which retains an unusual number of later C19 fittings.</i> ” (Ref 1-25).	The pub has two unlisted buildings to its south that appear to date from the C19, though they are much altered. Other buildings in the close setting of this part of Hampstead Road are very varied and date largely from the C20. The listed building is appreciated as an isolated C19 survival and is best appreciated in closer views across Hampstead Road. The appreciation of its interior which contributes significantly to its heritage significance would not be affected by changes to the wider setting. Views south along Hampstead Road from the location of the listed building are terminated by the Triton Building and Euston Tower with the BT Tower seen beyond marking the northern edge of central London in this important approach from the N. Further tall buildings in the wider setting to the SW would not alter the taller modern character of the setting and would not impact on the most significant close views of the pub; susceptibility to change of the setting of the listed buildings to development of the scale proposed in the area of the Site is therefore low. Value: high Susceptibility of setting: low Sensitivity: Medium