

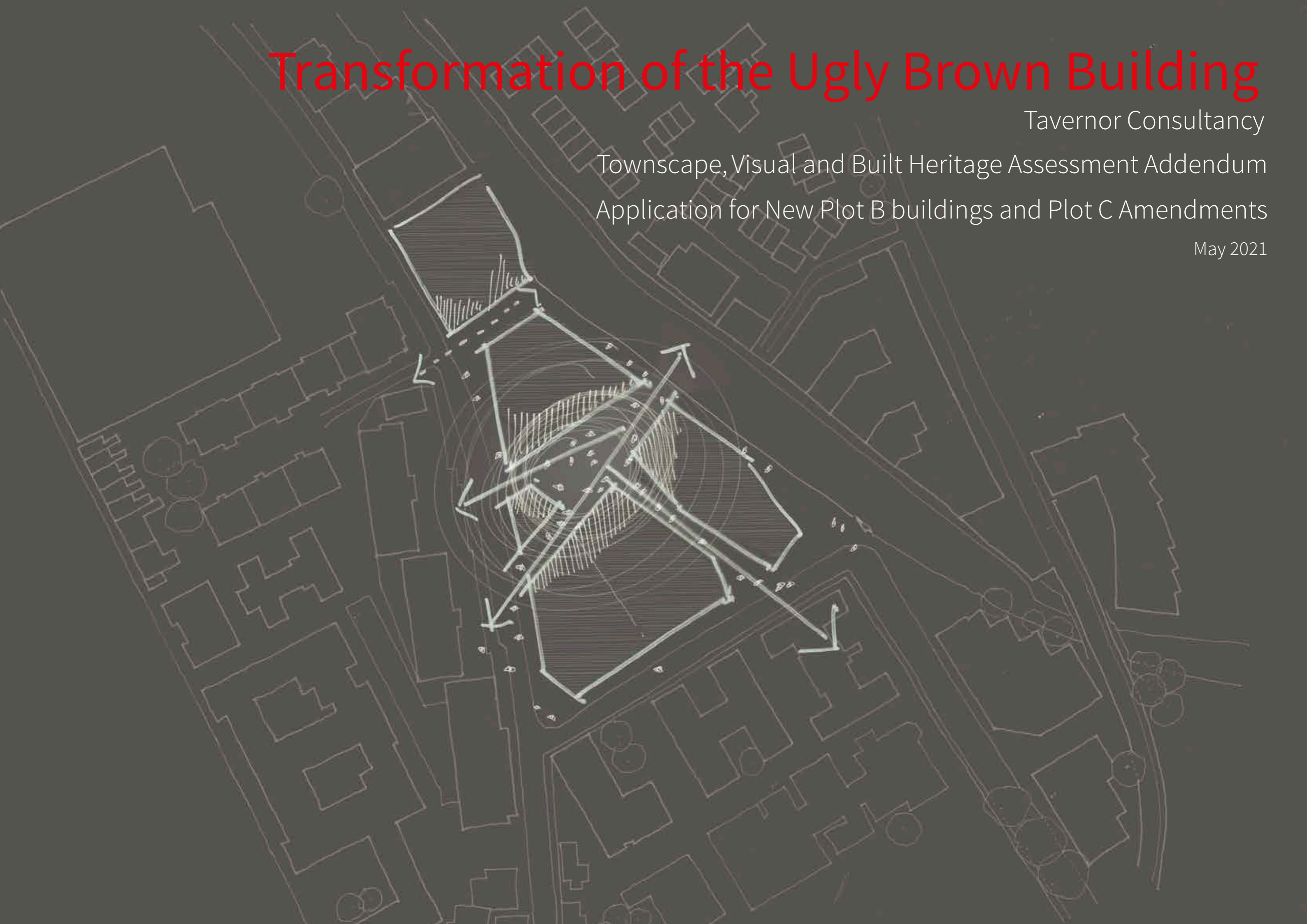
Transformation of the Ugly Brown Building

Tavernor Consultancy

Townscape, Visual and Built Heritage Assessment Addendum

Application for New Plot B buildings and Plot C Amendments

May 2021



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May 2021

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1 Introduction

<p>1.1 This Townscape, Visual and Built Heritage Assessment (TVBHA) has been prepared by the Tavemor Consultancy Ltd ('Tavemor Consultancy') on behalf of Reef Estates Limited (the "Applicant") in support of the following two applications to London Borough of Camden Council ("LBC or the "Council") for:</p> <p>Detailed planning permission (the "Application") for redevelopment of The Ugly Brown Building, 2-6 St Pancras Way, London NW1 0TB (the "Site"). The proposed description of development is:</p> <p><i>'Demolition of existing building, and redevelopment to provide a nine-storey building with two basement levels for flexible Class E and Sui Generis Use, a two-storey Pavilion for flexible Class E and Sui Generis Use, along with associated cycle parking, servicing, hard and soft landscaping, public realm, and other ancillary works, alongside amendments to Plot C within planning permission 2017/5497/P, namely increase of affordable housing provision' (the "Proposed Development").</i></p>	<p>composition of representative local townscape views and on the settings of designated and non-designated heritage assets close to the Site. The assessment is based on architectural drawings by Bennetts Associates which are being submitted as part of the planning application, and verified images by Miller Hare, which are included within this report. This document should be read in conjunction with the Design and Access Statement (DAS) produced by Bennetts Associates. The Proposed Development has been modelled in a selection of views assessed in the March 2018 TVBHA, as agreed with London Borough of Camden officers during pre-application discussions for permission 2017/5497/P. These are close rendered views in which the revised design of the Proposed Development would be most visible. The remaining views assessed in the March 2018 TVBHA have been remodelled but not reassessed and are included in Appendix A1.</p>	<p>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).</p>	<p>of significance to Grade I and II* listed buildings and WHSs should be wholly exceptional.</p>
<p>1.2 Application 2017/5497/P was granted full planning permission on the 17th March 2020 for the following development: <i>Demolition of the existing building (Class B1 and B8) and erection of 6 new buildings ranging in height from 2 storeys to 12 storeys in height above ground and 2 basement levels comprising a mixed use development of business floorspace (B1), 73 residential units (C3) (10xstudio, 29x1 bed, 27x2 bed 7x3 bed), hotel (C1), gym (D2), flexible retail (A1 – A4) and storage space (B8) development with associated landscaping work.</i></p>	<p>1.8 The methodology for the assessment has not altered and is as set out in the March 2018 TVBHA.</p> <p>1.9 For each viewpoint, the following views have been modelled:</p> <ol style="list-style-type: none"> 1. Consented Development: with the Consented Development inserted in render or wireline form as assessed in the March 2018 TVBHA; 2. Proposed Development: with the Proposed Development inserted in render or wireline form; and 3. Proposed Development, cumulative: with the Proposed Development inserted in render or wireline form together with significant approved or submitted schemes (as orange wirelines). 	<p>1.13 Policy and guidance relating to conservation and enhancement of the historic environment is set out in Chapter 16 of the NPPF. It is identical to the NPPF 2018 and broadly consistent with the policies in NPPF 2012 Chapter 12. It sets out the Government's overarching planning policies put in place to conserve the historic environment and its heritage assets so that they may be enjoyed by this and future generations. It gives guidance relating to designated heritage assets – listed buildings, conservation areas, World Heritage Sites (WHS) and Registered Parks and Gardens – and undesignated heritage assets, buildings positively identified as having a degree of heritage significance meriting consideration during the planning process.</p> <p>1.14 In order to assess the nature and degree of likely effects on the significance of heritage assets, the Chapter 16 of NPPF requires "an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance." (para. 189)</p> <p>1.15 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.</p>	<p>1.18 Less than substantial harm "should be weighed against the public benefits of the proposal" (para. 196). 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:</p> <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."
<p>1.3 Permission 2017/5497/P granted consent for the use of Plot B as a nine-storey building with a single basement, which would be used as a hotel at lower levels, with office use above. The entire building was to be occupied by Ted Baker, who would operate the hotel and occupy the office space.</p>	<p>1.10 The cumulative schemes modelled are unchanged from those included in the March 2018 TVBHA.</p>	<p>1.16 When determining applications, Chapter 16 of the NPPF requires Local Planning Authorities to account for:</p> <ul style="list-style-type: none"> • "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). 	<p>1.19 When considering proposals for development within a conservation area, WHS or 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). Additional guidance is given in relation to changes in settings in the Historic England publication; The Setting of Heritage Assets (Ref 1-4).</p> <p>1.20 The assessment has been formed to accord with these policies. The relevant records have been consulted as part of the design process and the significance of potentially affected heritage assets has been assessed in proportion to the likely effects of the proposals. The Site does not contain any listed buildings and is not located in a conservation area. There are listed buildings and conservation areas in the wider surrounding area. Opportunities to enhance or preserve positive aspects of the setting of heritage assets has informed the design process and any potential 'harm' has been weighed against other heritage and public benefits brought by the Proposed Development.</p>
<p>1.4 In the time since the permission was granted, changing economic circumstances and the Covid-19 pandemic mean that a hotel no longer represents the optimal use of the site. Furthermore, Ted Baker will no longer be retained as occupiers of the proposed building.</p>	<p>Methodology</p> <p>Legislation and Planning Policy</p> <p><i>National Planning Policy Framework (NPPF) (2019) (Ref 1-5A)</i></p>	<p>1.17 When assessing the likely impact of a proposed development, "great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting" (para. 195). The substantial harm or loss</p>	<p><i>The London Plan: Spatial Development Strategy for Greater London (March 2021) (Ref 1-7A)</i></p> <p>1.21 The new London Plan was published in March 2021. There are no material changes to the previous London Plan policy of relevance to this revised assessment. .</p> <p><i>Camden Planning Guidance CPG1 – Design (2019) (Ref 1-11A)</i></p>
<p>1.5 As a result, the applicant is now to redesign the buildings on Plot B and C4 of the site, and revise the affordable housing provision in plot C2..</p>	<p>1.11 A National Planning Policy Framework (NPPF) was introduced in 2012 (Ref 1-5) to replace the previous Planning Policy Statements (PPS), and revised in July 2018 and February 2019. It sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system.</p>	<p>1.22 The 2019 guidance replaces the previous 2011 publication (Ref 1-11) and has been updated to support the Camden</p>	<p>1.22 The 2019 guidance replaces the previous 2011 publication (Ref 1-11) and has been updated to support the Camden</p>
<p>1.6 A separate application was submitted in March 2021 for amendments to the Plot A element of the Site. Documents for this application have been prepared based on a scenario in which these amendments have been implemented.</p>	<p>1.12 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</p>	<p>1.22 The 2019 guidance replaces the previous 2011 publication (Ref 1-11) and has been updated to support the Camden</p>	<p>1.22 The 2019 guidance replaces the previous 2011 publication (Ref 1-11) and has been updated to support the Camden</p>
<p>1.7 This TVBHA provides an assessment of the likely effects of the revised design of Plots A, B and C of the Proposed Development on the surrounding townscape character and</p>	<p>1.12 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</p>	<p>1.22 The 2019 guidance replaces the previous 2011 publication (Ref 1-11) and has been updated to support the Camden</p>	<p>1.22 The 2019 guidance replaces the previous 2011 publication (Ref 1-11) and has been updated to support the Camden</p>

Local Plan adopted in 2017, though the content is broadly as for the 2011 document. The SPD considers building design in more detail. Sections 2 Design Excellence and 3 Heritage are of particular relevance to this assessment. CPG1 reiterates that good design should enhance the character of existing buildings on the site, the setting of the existing context of the site and strategic and local views; this is particularly important in conservation areas. Good design should provide visual interest from all aspects and distances. Materials should form an integral part of the design process and should relate to the character and appearance of an area, particularly in conservation areas and within the settings of listed buildings.

1.23 Otherwise the planning policy context remains as set out in the March 2018 TVBHA.

Baseline conditions

1.24 The baseline conditions for the assessment have not altered and are as set out in the March 2018 TVBHA.

Visual Characteristics of the Proposed Development

1.25 The design of the buildings on Plots A, B and C, would alter in comparison to the Consented Development, with the height and massing remaining as consented. The affordable housing provision would be increased to 50.8% on Plot C, however the overall number of units would remain the same. These changes have evolved in consultation with LBC officers during pre-application discussions.

1.26 The key amendments to the Consented Development are as follows:

Plot A.;

- Roof plant enclosure enlarged & increased in height by 830mm to accommodate future labs tenant services (omission of green roof to this level);
- Pavilion fins increased in height by 340mm;
- The north façade has been set back by 300-500mm to create a gap between Canal Side Studios with a metal closer panel provided on St Pancras Way to prohibit access;
- Provision of Davit Arm Industrial Rope Access points for cleaning and maintenance in place of BMU;
- Planting to level 05 terrace (green roof and blue roof provision);
- Sliding doors with internal glazed balustrade opening on to Regent's Canal (previously fixed windows);
- Terrace balustrade height has been lowered to correspond to lowered floor levels

- Signage Locations proposed at ground floor level;
- Revolving door relocated to south façade (swapping with the pass door) to improve legibility of reception entrance from canal and St. Pancras way approaches;
- Pass door moved to west façade (swapping with revolving door);
- Doors to St Pancras Way have been inset and set back from the pavement;
- Revolving door and double door to café (located on the south façade, upper level) replaced with single leaf door and fixed glazing to allow internal seating to be positioned up against canal;
- Solid panelling has been added to the secondary core shaft to match the metal material finish of the adjacent curtain walling;
- Pavilion spandrels changed from laminated glass to PPC metal panels to ensure only non-combustible materials are used at compartment lines;
- Pavilion parapet increased in height by 117mm to accommodate satisfactory & uniform floor to ceiling heights to all floors; and
- External steps & landscaping to south of Plot A amended.

Plot B:

- Plot B to be used as flexible commercial space, offices, and ancillary storage, as opposed to the hotel use in the consented scheme;
- Roof plant enclosure increased in size;
- The Plot C4 pavilion building redesigned;
- The cladding to the base and upper volumes of Plot B has been redesigned, to adjust rhythm and regularity; and
- The landscape has been redesigned to optimise the pedestrian experience.

Plot C:

- The Plot C changes are internal and will therefore have no impact on townscape or heritage.

1.27 The massing and architectural treatment of the building on Plot B has been adjusted to address the canal in a more positive fashion. The architectural treatment of the brick base would be more open than that of the Consented Development, increasing the animation of the lower part of the building on to the canal.

1.28 The Plot B Building will be expressed in two primary volumes, a three-storey heavy masonry base that references the historic warehouse architecture of Regents Canal and contrasting lighter metal and glazed upper tiered volumes. Both volumes have the same elevation detail treatments on all four elevations, retaining and reinforcing the strengths of the consented scheme concept.

1.29 Window and main entrance locations, proportions and recesses within the masonry base have been carefully considered and articulated to engage with the internal spaces and the surrounding public realm. The base incorporates splayed corners to maximise accessibility at ground level and to soften the corners of the building especially when viewed from Regents Canal and St Pancras Way. Within the masonry base, the ground plane and window arrangement on elevation both respond to the external levels as they rise towards the canal.

1.30 The form of the Pavilion Building and materiality has been amended to respond to the new base of Plot B.

2 Revised effects

Demolition and Constructi

- 2.1 The effects of demolition and construction would not alter in comparison to the Consented Development.

Completed Proposed Development

Built Heritage Assessment

Assessment of likely effects on the character and appearance of the Regent's Canal Conservation Area

- 2.2 As demonstrated by Views 4, 5 and 13, like the Consented Development, the Proposed Development would make a major change to the character and appearance of the southern part of sub-area 2 of the conservation area. As for the Consented Development, due to the alignment of the canal and the scale of the Proposed Development, from the northern end of sub-area 2 the effects would be much more limited. As for the Consented Development, due to the alignment of the canal and the scale of the Proposed Development the effects on sub-area 1 to the north would be negligible. From the northern half of sub-area 3 to the south, the Proposed Development, like the Consented Development would be clearly visible but its effect would be greatly reduced by the intervening consented schemes at 101 and 102 Camley Street to the south-east of the Site.
- 2.3 Although the canal frontage of Plot A of the Proposed Development would appear slightly taller than the Consented Development, and the architectural treatment of plant screening on both the canal and St Pancras Way frontages, would be noticeably different in character from the Consented Development, the proposed changes would not materially alter the scale or nature of any effects on the character and appearance of the conservation area. As for the Consented Development the upper storeys of Plot A would be set well back from the canal edge elevation and its architectural treatment has been carefully considered to complement the varied industrial and residential architectural character of the existing and emerging canal edge. The brick base of Plot B of the Proposed Development would be more open than that of the Consented Development, increasing the animation of the canal edge. The plant enclosure on Plot A of the Proposed Development would be slightly taller than in the Consented Development and set back further from the canal edge, which would be discernible but barely noticeable in View 4 from the Regent's Canal. The increase in the height of the plant enclosure would not be visible in View 13 from St Pancras Way. As for the Consented Development, the subdivision of the large Site into a number of smaller plots with variations in their use and appearance would break up the long canal frontage and the streetscape along St Pancras Way. As for the Consented Development, the variation in the roofscape and architectural treatment across the plot would complement the meandering picturesque alignment of the canal and the existing finer grain of the western canal edge to the north of the Site. As the rendered views and the DAS illustrate, the

Proposed Development would continue to enhance the architectural quality of the canal edge and St Pancras Way with a resulting enhancement of the character and appearance of the conservation area.

- 2.4 As for the Consented Development, the character and appearance of the conservation area would be preserved or enhanced by the Proposed Development in accordance with Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (Ref 1-15). There would be no harm to the designated conservation area and therefore paras.195 and 196 of the NPPF (Ref 1-5A) would not be engaged. The assessment would not alter from the March 2018 TVBHA.

Significance of likely effect: **Negligible to major, beneficial**

Cumulative effects

- 2.5 The consented developments at 101 and 102 Camley Street, are outside the conservation area. Therefore, while they would have an effect on the close setting of the conservation area they would not alter the effect on the character and appearance of the conservation area itself and would not alter the significance of effect in comparison to that of the Proposed Development assessed in isolation.

Significance of likely cumulative effect: **Negligible to major, beneficial**

Assessment of likely effects on the setting of the King's Cross Conservation Area

- 2.6 As Views 12 demonstrates, the likely effects on the setting of the King's Cross Conservation Area, which is the closest part of the conservation area to the Site, would not be altered by Proposed Development in comparison to the Consented Development. Like the Consented Development, the Proposed Development would have a beneficial effect on the setting of the northern edge of the conservation area. There would be no harm to the setting of the designated conservation area therefore paras.195 and 196 of the NPPF (Ref 1-5A) would not be engaged. The assessment would not alter from the March 2018 TVBHA.

Significance of likely effect: **Negligible to moderate, beneficial** in winter; **negligible** in summer

Cumulative effects

- 2.7 The consented development at 101 Camley Street is within the conservation area and that at 102 Camley Street, is adjacent to its north-east edge. The cumulative development would slightly increase the magnitude of effect on the setting of the conservation area but would not alter the significance of effect in comparison to that of the Proposed Development assessed in isolation.

Significance of likely cumulative effect: **Negligible to moderate, beneficial** in winter; **negligible** in summer

Assessment of the likely significant effects on the heritage significance of listed structures, historic parks and gardens and non-designated heritage assets

- 2.8 There would be no material change to the effects on the settings of listed structures, historic parks and gardens and un-designated heritage assets assessed in Table 6-1 of the March 2018 TVBHA as a result of the Proposed Development in comparison to the Consented Development. The aspects of setting of all heritage assets assessed that make a contribution to the heritage significance of that heritage asset would be preserved by the Proposed Development in accordance with Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (Ref 1-15). As for the Consented Development, there would be no harm to the heritage significance of the listed structures and landscapes, therefore paras.195 and 196 of the NPPF (Ref 1-5A) would not be engaged.

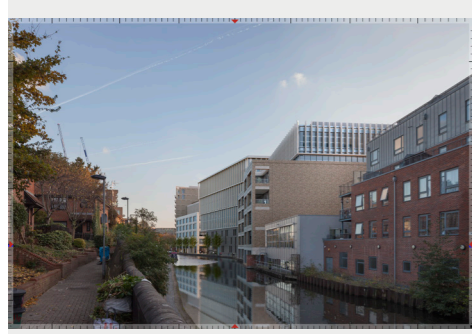
Townscape and Visual Assessment

- 2.9 Five rendered views included in the assessment of the Consented Development have been remodelled and reassessed to demonstrate revised townscape and visual effects as a result of the Proposed Development. The remaining views assessed in the March 2018 TVBHA are included in Appendix A1.

Table 2-1 Townscape Assessment Views

View	Viewing position	Geographical extent of effect	Render/Wireline
4	Elm Village (day)	Local	Render
4N	Elm Village (dusk)	Local	Render
5	Regent's Canal Towpath, looking north	Local	Render
8	Plender Street, junction with College Place	Local	Render
12	St Pancras Way, junction with Pancras Road	Local	Render
13	St Pancras Way, outside No.22	Local	Render

The Views



4 | Elm Village (day)



4N | Elm Village (dusk)



5 | Regent's Canal Towpath, looking north



8 | Plender Street, junction with College Place

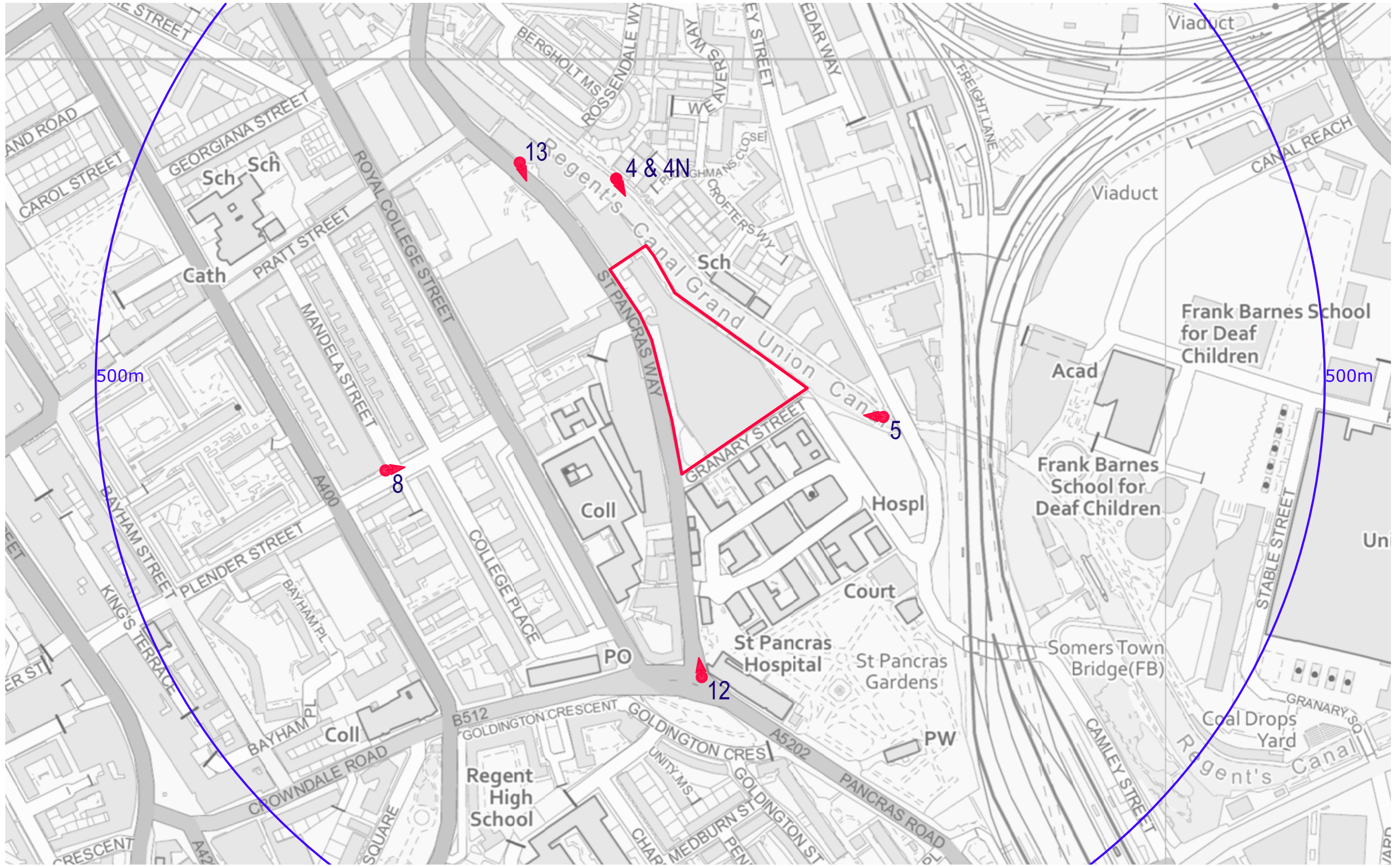


12 | St Pancras Way, junction with Pancras Road



13 | St Pancras Way, outside No.22

View	Description	MH Reference	Type	Method	Camera Location			Camera	Lens	HFOV		Photo date/time	Bearing	distance (km)
					Easting	Northing	Height			Photo	Image			
4	Elm Village (day)	1100	Render	Verified	529553.2	183903.8	27.38	Canon EOS 5D Mark II DSLR	24mm	74.2	72.7	11/11/2016 14:49	155.0	0.2
4N	Elm Village (dusk)	1150	Render	Verified	529553.3	183903.7	27.38	Canon EOS 5D Mark II DSLR	24mm	74.2	73.0	11/11/2016 16:52	155.0	0.2
5	Regent's Canal Towpath, looking north	1250	Render	Verified	529770.5	183710.0	25.31	Canon EOS 5D Mark II DSLR	24mm	101.6	101.6	28/03/2017 10:42	286.6	0.2
8	Plender Street, junction with College Place	1500	Render	Verified	529365.5	183666.4	25.74	Canon EOS 5D Mark II DSLR	24mm	73.8	72.9	11/11/2016 13:55	71.2	0.3
12	St Pancras Way, junction with Pancras Road	1950	Render	Verified	529622.9	183498.3	20.46	Canon EOS 5D Mark II DSLR	24mm	74.1	73.3	24/02/2017 11:52	0.0	0.3
13	St Pancras Way, outside No.22	2000	Render	Verified	529474.8	183916.9	23.24	Canon EOS 5D Mark II DSLR	24mm	74.2	73.0	11/11/2016 14:19	137.7	0.2



View location map



Consented Development

Consented Development

2.10 This elevated view overlooking the Regent's Canal is taken from the path adjacent to Nos.11-14 Ploughman's Close, in Elm Village. The viewing position is just outside sub-area 2 of the Regent's Canal Conservation Area, south of View 3. On the west side of the canal to the right is a taller residential block at No.16, which continues the strong built residential edge to the west side of the canal seen in View 3. The Consented Development, taller than the existing former sorting office, would make a major change to the composition of this close view. The subdivision of the large Site into a number of smaller plots with variations in their use would physically and visually break up the long canal frontage. The resulting variation in the roofscape and architectural treatment would complement the meandering picturesque alignment of the canal and the existing finer grain of the western canal edge to the north of the Site. The Consented Development would therefore have a beneficial effect on the composition of view and would enhance activation, permeability and architectural quality of the canal edge with a resulting enhancement of the character and appearance of the Regent's Canal Conservation Area.

Significance of likely effect: **Major, beneficial**

Proposed Development

2.11 The proposed change to the height and architectural treatment of the upper storeys of Plot A would be noticeable but would not change the scale of impact on the view. The upper levels of Plot A would be 830mm taller than that in the Consented Scheme and would remain well set back from the canal frontage. The alterations to the façade would result in a more solid appearance, which as for the Consented Scheme, has been articulated with white pre-cast concrete vertical fins that would complement the treatment of consented Plot B. The canal frontage of the upper storeys would remain animated by windows. The cladding to the upper storeys of Plot A would be darker than the treatment of the Consented Scheme, providing a dramatic contrast with the white fins and integrating the upper plant with the top storey as a whole. The brick base of Plot B of the Proposed Development would be more open than that of the Consented Development, increasing the animation of the canal edge. The plant enclosure on Plot A of the Proposed Development would be 1270mm taller than in the Consented Development and set back further from the canal edge, which would be discernible but barely noticeable in this view. The proposed changes to Plot C would not be discernible in the view. Although the architectural treatment of the upper storeys of Plot A and the



Proposed Development

brick base of Plot B would be noticeably different from that of the Consented Development, the quality of the Proposed Development would remain very high and it would continue to have a beneficial effect on the composition of view as a whole. The effect of the Proposed Development would not alter from that of the Consented Development.

Significance of likely effect: **Major, beneficial**

Cumulative

2.12 101 Camley Street would be visible as a more distant building of equivalent height to the Proposed Development, preserving the perspective and terminating the southerly channelled view. The cumulative development would slightly increase the magnitude of the effect but would not alter the significance of effect in comparison to that of the Proposed Development assessed in isolation.

Significance of likely cumulative effect: **Major, beneficial**

