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Our ref: P01451244

31 January 2022

Dear Mr McClue

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**MURPHY'S YARD LAND TO THE SOUTH OF GORDON HOUSE ROAD BOUNDED  
BY RAILWAY LINES TO THE EAST, WEST AND SOUTH AND ACCESSED FROM  
GORDON HOUSE ROAD, SANDERSON CLOSE AND GREENWOOD PLACE  
LONDON NW5  
Application No. 2021/3225/P**

Thank you for your letter of 4 January 2022 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

The proposed development of the Murphy's Yard site to a height of up to 19 storeys would affect the strategic views of central London from Parliament Hill, which are of major importance. The impact would be significant, blocking, and diminishing the impact of, views of key parts of central London from a number of angles on Parliament Hill. Regional and local policies both strongly support the importance of these strategic views. Historic England has significant concerns about the harmful impact of the proposals, and these should be addressed.

**Historic England Advice**

Significance

Murphy's Yard is a large area of former railway land, between a number of different railway lines, west of Kentish Town. It was formerly a major maintenance depot of the Midland Railway, and the partially surviving engine sheds are locally listed buildings. Other than this the site currently has little heritage interest, but large scale development on the site would potentially impact on the setting of a number of nearby listed buildings and conservation areas, and on protected views from Parliament Hill and locally from Kentish Town station.



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The panoramic views from Parliament Hill are of London-wide significance. They enjoy unrestricted public access, and are perhaps the best places from which to appreciate the topography of London. The views demonstrate how London is contained within a gentle bowl of hills, descending down into the Thames basin, culminating in the larger scale buildings and landmarks of central London. Here you can see why London is such a natural place to develop into a major city, and the twin poles round which it developed, the City and Westminster, exemplified by the Houses of Parliament and St Paul's, together with the relatively new pole of the Canary Wharf district. The height of Parliament Hill allows most of London's landmarks and tall building clusters to be seen in a glance, and related to each other. Here the spaghetti of the Tube map can be seen as a great city.

The view west-north west from Kentish Town station across the railway bridge allows long views of the wooded hills beyond, and is a reminder of when this was the edge of London. Its survival today is unusual for inner London, and is clearly of significant local interest. The neighbourhood plan states that the view 'is cherished by local people and visitors alike ... in this very built-up area it is the only chance to get a long green view'.

### Impact

The development would involve redevelopment of the site with buildings of up to 19 storeys, and part-retention of the locally-listed engine sheds.

In the view from just east of Parliament Hill, LVMF 2B.1, the scheme would have a major impact on the view, with the scale of development and its relative closeness to Parliament Hill meaning that it would have a prominent, even dominant, position in the view, obscuring much of the gap between the City of London and Westminster and blocking much of central London from view. The impact is to hamper much of the townscape legibility that makes this view so important.

In LVMF view 2A.1, from Parliament Hill summit, this would constitute large scale development in the foreground of the panorama. The development would block views of parts of the City of London, and erode the distinction between the lofty hilltop and large scale development in the distance, with a notable impact on the panoramic view. The gap between the City cluster and Canary Wharf would also be partly blocked. The result would be that key features in the view would become hidden and the legibility of the panorama would be lost.

In the view from Kentish Town Station across the railway bridge, (views 12a and b in the TVIA), Hampstead Heath currently appears as low wooded hills visible in a relatively wide cone of vision. The development would have a major impact on this view, which is protected in the Kentish Town Neighbourhood Plan. The view of the hills





would be blocked for much of the width of the view by the prominent new buildings. A small corridor would be left through which Parliament Hill would be visible, but the topography would be hard to read, with the wooded hills reduced to little more than a slot between buildings.

There would be an impact on the significance of Christ Apostolic Church (Grade II) due to the impact on its setting. The church has a landmark quality with its west spires seen against the sky. The proposed development would loom behind this important building, so that the spires would be seen with the new development behind them relatively close by rather than against the sky, reducing the landmark quality of the building, a significant adverse impact.

The development would also have an impact on the character of the locally-listed engine sheds due primarily to significant alterations to their massing.

### Policy

At paragraph 130 of the National Planning Policy Framework, it states that 'planning policies and decisions should ensure that developments ...are sympathetic to local character and history, including the surrounding built environment and landscape setting'.

In the London Plan 2021, Policy HC3 covers strategic and local views. HC3 part A explains that 'Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.' Part F of HC3 states that 'Boroughs should include all designated views, including the protected vistas, in their Local Plans and work with relevant land owners to ensure there is inclusive public access to the viewing location, and that the view foreground, middle ground and background are effectively managed in accordance with the LVMF SPG.' At 7.3.1, it states that 'the Mayor will seek to protect the composition and character of these views, particularly if they are subject to significant pressure from development.'

Policy HC4 A 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.' At B it continues to say that 'Development in the foreground, middle ground and background of a designated view should not be intrusive, unsightly or prominent to the detriment of the view'. At D it states that 'London Panoramas should be managed so that development fits within the prevailing pattern of buildings and spaces, and should not detract from the panorama as a whole.'

The London View Management Framework (LVMF) is supplementary policy guidance



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to the London Plan. The view from Parliament Hill towards central London is a London Panorama in that document. Development 'should fit within the prevailing pattern of buildings and spaces and should not detract from the Panorama as a whole'. As paragraph 62 explains, 'The middle ground is often an area of transition, most often formed by lower scale development merging with a more intense commercial core. Development in the foreground and middle ground that is overly intrusive, unsightly or prominent to the detriment of the view as a whole should be refused.'

Talking about Parliament Hill specifically, the LVMF states that while 'there are a number of outlooks on the hill ... some of the best panoramic views are from the summit, towards the City of London'. The Visual Management Guidance states specifically at para 99 that 'the panorama is sensitive to large-scale development in the foreground.' The presence of the City cluster and the Canary Wharf cluster of tall buildings is specifically noted in the LVMF on p. 45 as 'complementary and prominent elements', in dialogue with the landmark historic buildings.

Policy D1 Design of the Camden Local Plan states that 'the Council will require that development ... preserves strategic and local views'. At 7.26 it is explained that the views from Parliament Hill are amongst 'London's most famous and valued views'. At 7.27 it is stated that 'the Council will protect these views in accordance with London-wide policy and will resist proposals that would harm them. At 7.28 the Plan goes on to say that 'the Council will also consider the impact of a scheme, in terms of the townscape, landscape and skyline, on the whole extent of a view ('panorama'), not just the area in the view corridor. Developments should not detract from the panorama as a whole and should fit in with the prevailing pattern of buildings and spaces.'

In the Kentish Town Neighbourhood Plan, adopted in 2016 as part of Camden's Local Plan, Policy D1 states that the uninterrupted view from adjacent to Kentish Town station towards Parliament Hill, which is defined with both a Protected Corridor and a Peripheral Corridor, 'is required to be maintained, as far as possible, for future generations. Development that takes place within the "Peripheral Corridor" must be compatible with the view in terms of its setting, scale and massing.' The reasoned justification for this explains the strong view of local people on this question and that this is the only long green view in this very built-up area. Policy HC3 (G) of the London Plan makes clear that 'Boroughs should clearly identify local views in their Local Plans and strategies. Boroughs are advised to use the principles of Policy HC4 London View Management Framework for the designation and management of local views.'

### Position

Historic England is concerned that the proposed development would have a significant impact on the views from Parliament Hill, for the reasons explained above. The scale of development would block large and important parts of the views over central



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London. It would undermine the legibility of the panorama as a means to understand the urban composition and character of London, and the context of its key landmarks. This panoramic view over central London is of considerable public importance, experienced by millions and one of the most beloved views of London, with huge public value. These impacts harm would run counter to policies in both the London Plan and the Camden Plan. Historic England encourages you address these concerns, with the aim of negotiating a scheme that avoids significant impacts on these strategic views. At the very least, the impacts on strategic views would need to be weighed in the planning balance in determining the scheme.

The impact on the locally important view from Kentish Town station would also be significantly harmful, blocking most of the views of the hills that are the reason for its protection in Camden's Local Plan.

The TVIA methodology confirms that the images shown in the TVIA have been taken with a 24mm lens. Good practice guidance suggests that this does not most accurately reflect what the human eye sees. We encourage the applicants to produce views in line with the Landscape Institute Technical Guidance Note 06/19 Visual Representation of development proposals, which specifies a 50mm lens.

## **Recommendation**

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 127-130 of the NPPF.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely



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