



ABBEY ROAD

London Borough of Camden

Heritage, Townscape and Visual Impact Assessment

Prepared by The Townscape Consultancy for the London Borough of Camden

April 2022

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Project

Abbey Road, London Borough of Camden

Client

London Borough of Camden

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Disclaimer

Assumptions and Limitations

This report is compiled using primary and secondary information derived from a variety of sources, only some of which have been directly examined. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

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1. Introduction

- 1.1 This report has been prepared on behalf of London Borough of Camden ('The Applicant') and presents the findings of an assessment of the effect of the development proposals ('the Proposed Development'), at Abbey Road, Camden ('the Site') within the jurisdiction of the London Borough of Camden ('LBC'), on townscape, visual amenity, and the heritage significance of (above ground) heritage assets. The Heritage, Townscape and Visual Impact Assessment (HTVIA) was undertaken by The Townscape Consultancy (TTC), a practice that provides independent expert advice on architecture, urban design, townscape and heritage.
- 1.2 The area highlighted in red in Figure 1.1 illustrates the approximate Site boundary.
- 1.3 The Proposed Development, designed by Pollard Thomas Edwards (PTE) ('The Architects'), consists of the following:
- 'Demolition and redevelopment of Emminster and Hinstock blocks including Belsize Priory Health Centre, Abbey Community Centre, public house and commercial units to provide new residential accommodation (Use Class C3) and ground floor commercial space (Use Class E/Sui Generis) to be used as flexible commercial units, across three buildings ranging from 4 to 11 storeys, along with car and bicycle parking, landscaping and all necessary ancillary and enabling works.'
- 1.5 TTC has collaborated with the architects during the design development process by providing design feedback from a heritage, townscape and visual impact perspective. This has been done in an iterative manner, using 3D computer models of the Proposed Development within its existing and emerging context.

Development on the significance of relevant aboveground heritage assets (HAs) in light of policy and guidance set out in the NPPF and development plan policy. It also considers the visual impact of the Proposed Development on the townscape of the area around the Site, analysing the character of the Proposed Development on views from locations around the Site.

1.7 The HTVIA sets out:

- TTC's methodology for assessment in Chapter 2;
- Relevant statutory duties and design and historic environment policy and guidance in Chapter 3;
- Historic development of the Site and its surroundings in Chapter 4;
- A description of the Site and its context in Chapter 5;
- A description and assessment of the architectural and urban design quality of the Proposed Development, including An assessment of the effect of the Proposed Development on the local townscape in Chapter 6;`
- Identification of relevant HAs pertaining to the Site and in the
 area around it, including relevant heritage designations (type
 and grade) and Statements of Significance for identified HAs
 in line with NPPF paragraph 189 and an assessment of the
 effect of the Proposed Development on the the settings of
 identified heritage assets in Chapter 7. The assessments of
 effect on heritage significance are undertaken with regard
 to the statutory duties of the Planning (Listed Buildings and
 Conservation Area) Act 1990 and in the context of national
 and local policy and guidance;
- Consideration of the effect of the Proposed Development in views from 17 viewpoints in Chapter 8; and
- Conclusions in Chapter 9.



Fig. 1.1: Aerial photograph showing the location of the site, outlines in red.

- 1.8 The views contained within Chapter 8 of this HTVIA have been prepared by GMJ, a specialist visualisation company.
- This report will be submitted as part of the planning application and should therefore be read alongside other planning documents within this submission, including the Planning Statement produced by CBRE Planning, and the Design and Access Statement (DAS) produced by the architects.

2. Methodology

2.1 This HTVIA considers the visual impact of the Proposed Development on the townscape of the area around the Site, analysing the character of the surrounding townscape, and assessing the effect of the Proposed Development on views from locations around the Site (see below regarding the selection of viewpoints). It also considers the impact of the Proposed Development on the significance of relevant above-ground heritage assets (HAs) in light of policy and quidance set out in the NPPF and development plan policy.

2.2 The HTVIA sets out:

- Relevant statutory duties and design and historic environment policy and guidance;
- Historic development of the site and its surroundings;
- A description of the Site and its context;
- Identification of relevant HAs pertaining to the Site and in the area around it, including relevant heritage designations (type and grade) in line with NPPF paragraph 194;
- A description and assessment of the architectural and urban design quality of the Proposed Development;
- An assessment of the effect of the Proposed Development on the local townscape;
- Anassessment of the effect of the Proposed Development on the settings of identified heritage assets. The assessments of effect on heritage significance are undertaken with regard to the statutory duties of the Planning (Listed Buildings and Conservation Area) Act 1990 and in the context of national and local policy and guidance;
- Consideration of the effect of the Proposed Development in views from 17 viewpoints; and
- Conclusions.

- .3 This HTVIA should be read in conjunction with the following, submitted as part of the planning application:
 - Planning application drawings, and Design and Access Statement (DAS) for the planning application by PTE.
 - Other supporting information with the planning application. For full details and scope of the application, please refer to the submitted Planning Statement, prepared by CBRE.
- 2.4 Below ground archaeology is not considered in this report (a separate Archaeology Assessment by others is submitted with the planning application).

METHOD OF ASSESSMENT – TOWNSCAPE AND VISUAL

- 2.5 The Townscape and Visual Impact Assessment has been carried out as follows.
- The present-day condition of the Site and the surrounding area was ascertained by site visits, supported by a study of maps and aerial photographs (available on the internet as an integrated set of data at www.google.co.uk/maps), and the following publication:
- The Buildings of England: London 4: North, B Cherry and N Pevsner, Yale UP, 2002
- Site visits allowed the accuracy of record data to be verified.
 Record photographs were taken on site visits.

- Buildings, open spaces, townscape and views that have the potential to be affected by the Proposed Development, particularly those that have been previously identified as significant by designation or in other ways, are identified through this process. The study area is formed of those areas around the Site on which the Proposed Development could have a significant effect in townscape terms, informed by site visits and desk study as outlined above, as well as testing of the visibility of the Proposed Development using VuCity.
- The effects on these buildings, open spaces, townscape and views are studied, by the designers of the Proposed Development in collaboration with the authors of the HTVIA, as part of the process of developing the design. This process includes digital modelling of the designs as they are developed, so that the visual impact can be tested.
- The impacts of the Proposed Development, in the form in which it is submitted for planning permission, on the identified townscape character areas and views are assessed by the townscape assessors. This assessment is informed by computer generated images showing 'as existing' and 'as proposed' views from selected viewpoints.

Identification of viewpoint locations

A study was undertaken to establish a set of potential viewpoint locations from which 'before and after' views are provided. The study area is centred on the Site and is limited to locations from which the Site can be seen, or from which new buildings on the Site would be seen.

- 2.13 Within this study area, four types of viewing location, all publicly accessible, were identified:
 - Views that have been identified as significant, by LBC or others (for example, the GLA), i.e. in planning policy and quidance documents and conservation area appraisals;
 - Other locations or views of particular sensitivity, including those viewpoints in which the Proposed Development may significantly affect the settings of heritage assets;
 - Representative townscape locations from which the Proposed Development will be visible; and
 - Locations where there is extensive open space between the viewer and the Proposed Development so that it will be prominent rather than obscured by foreground buildings. This includes areas of open space that are important in a local context, e.g. for leisure purposes.
- 2.14 The set of viewpoints was chosen to cover:
 - A representative range of viewpoints from different directions from which the Proposed Development will be visible;
 - A range of distances from the site; and
 - Different types of townscape area.
- Possible locations in these categories within the study area were identified based on an examination of maps and aerial photographs; the documents referred to above; and maps of conservation areas and maps and lists of listed buildings. The study area and the possible locations were then visited to establish candidate viewpoints. A photographic record was made of this visit together with a map showing photo locations. The viewpoint locations and view type (render or wireline) have been determined in consultation with LBC officers.

Assessment

- 2.16 For 5 of the 17 identified views illustrated in section 8 of this HTVIA, there are images of the view as existing and as proposed provided as 'Accurate Visual Representations' ('AVRs').AVRsareprovided either as rendered (photorealistic) images or as 'wirelines' (diagrammatic representations showing the outline of the Proposed Development as a yellow or red wireline, which is dashed where the scheme is occluded by foreground development or trees). Rendered and wireline images illustrate accurately the degree to which the Proposed Development will be visible, and its form in outline. Rendered images also show the detailed form and the proposed use of materials.
- 2.17 AVRs are produced by accurately combining images of the Proposed Development (typically created from a threedimensional computer model) with a photograph of its context as existing. The AVRs were created by GMJ, a firm which specialises in the production of these images, and their methodology is included at Appendix 1.
- 2.18 The assessment of individual views, and the concluding section concerning impact on townscape, which is informed by the view assessments, considers the effect on the townscape and views as they will be experienced by viewers in reality. Photographic images of townscape are no more than an approximation to this, for a number of reasons:
 - Viewers have peripheral vision; their view is not restricted by borders as a photograph is, and they can move their eyes and heads to take in a wide field of view when standing in one place;
 - Viewpoints themselves are not generally fixed. Townscape is experienced for the most part as a progression of views or vistas by people who are moving through streets or spaces rather than standing still:
 - Photographs do not reflect the perception of depth of field as experienced by the human viewer due to parallax;
 - Before and after views illustrate the view in conditions that are particular in respect of time of day and time of year, daylight and sunlight, and weather, and the view will appear differently to varying degrees when any or all of these things vary; and
 - Townscape is experienced not by the eye alone but by the interpretation by the mind of what the eye sees, considered in the light of experience, knowledge and memory.

The 'as proposed' images are provided as a guide to the effect on views as they would be experienced on site; to act as an aide-memoire; and to assist site visits. The assessment provided in this HTVIA represents a professional judgement of the likely effect of the Proposed Development on the view or the townscape, informed by site visits as well as the photographic images provided, rather than an assessment of the photographic images.

METHOD OF ASSESSMENT - HERITAGE

- 2.20 HAs have been identified using information derived from the National Heritage List for England website (historicengland. org.uk/listing/thelist) and the Local Planning Authority Website. The HAs comprise relevant conservation areas (CA), and listed buildings (LB). This process also identifies any relevant non-designated HAs that have been included on the Local Planning Authority's Local List which include Locally Listed buildings (LLB).
- 2.21 The Site does not fall within a conservation area or contain any listed buildings. The heritage assessment considers the indirect effects arising from the Proposed Development i.e. on the setting of HAs in the area around the Site, including those elements of setting, if any, that contribute to the heritage significance of HAs. Assessments are carried out in line with HE guidance documents as set out in section 3 below.
- In line with NPPF paragraph 194, these assessments are considered to be proportionate.

Study Area

The study area for this assessment extended to 500m from the centre of the Site for both designated HAs and non-designated HAs. The extent of the study area took into account the dense urban context of the Site and was informed by site visits, consideration of the effect of existing buildings of similar height and scale to that of the Proposed Development in the area, and testing of the visibility of development of the scale proposed for the Site using informed by material produced by the project visualiser, GMJ.

Method of Baseline Data Collection

- 2.24 A heritage receptor is defined as a feature, site or area which has the potential to be affected by a proposed development, either directly or indirectly - in this instance, a HA.
- 2.25 The process of collecting baseline data involved identifying the relevant HAs included in the following documentary and mapping resources:
 - Historic England on-line National Heritage List for England;
 - Statutory List of Buildings of Special Architectural and Historic Interest:
 - LBC Development Plan Documents and other guidance (including conservation area character appraisals);
 - London Borough of Camden ('LBC') conservation area Character Appraisals;
 - The Buildings of England: London 4: North, B Cherry and N Pevsner, Yale UP, 2002.
- 2.27 Identification of heritage receptors involved a desktop survey to identify relevant HAs on the Site and in the area around it. Designated HAs within 500m of the Site's centre point were included for initial consideration. The extent of the baseline was then informed by knowledge of the Site and the surrounding area and further desktop research. It has included consideration of:
 - National and local heritage policy and guidance;
 - The existing effects of the Site, including intervisibility between the Site and receptors;
 - The physical characteristics of the Site's context, including the effect of existing large scale buildings in the area around the Site; and
 - The nature of the Proposed Development.
- 2.28 Site visits were undertaken to check the desktop assessment with regard to the potential significance of the effect of the Proposed Development on the HAs within the surrounding area (and to check for any additional HAs that were not originally identified).
- 2.29 Listed building descriptions can be found on the National Heritage list for England and on Historic England's website historicengland.org.uk. CA boundary maps can be found on the local planning authority websites.

3. Policy and Guidance

3.1 This section sets out the relevant statutory duties, national, regional and local planning policy and guidance. For the purposes of this assessment, it is those policies relating to townscape and the historic environment that are of most relevance.

STATUTORY DUTIES

The Planning (Listed Buildings and Conservation Areas)
Act 1990

Listed Buildings

3.2 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the 1990 Act) states that, when considering applications for planning permission which affect a listed building or its setting, local authorities should 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.

Conservation Areas

Section 72 of the 1990 Act requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area.

PLANNING POLICY

National planning policy and guidance

The National Planning Policy Framework, 2021

- The Government issued the latest version of the National Planning Policy Framework (NPPF) in July 2021. The NPPF sets out planning policies for England and how these should be applied.
- 3.5 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which has three overarching objectives; economic, social and environmental. The NPPF states, at paragraph 10, that 'at the heart of the Framework is a presumption in favour of sustainable development.'

NPPF Section 12: Achieving well-designed places

3.6

- Section 12 of the NPPF deals with design. At paragraph 126, the NPPF states that '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'
- .7 Paragraph 130 notes that 'Planning policies and decisions should ensure that developments:

 a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

 c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'

Paragraph 134 states that Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes'. It goes on to say that 'Conversely, significant weight should be given to:

a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.' Section 16 of the NPPF deals with conserving and enhancing the historic environment. It applies to plan-making, decision-taking and the heritage-related consent regimes under the 1990 Act.

3.9

- Heritage assets are defined in Annex 2 of the NPPF as a 'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).'
- 3.11 The NPPF notes, at paragraph 184, that heritage assets 'should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.'
- 3.12 The NPPF requires an applicant to describe the heritage significance of any heritage assets affected by a proposal, including any contribution made by their setting (para 189). It goes on to say that '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.'
- The NPPF identifies three key factors that local authorities should take into account in determining applications (para
 - a) 'The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) The desirability of new development making a positive contribution to local character and distinctiveness.'

- 3.14 Paragraph 193 states that in assessing impact, the more important the asset, the greater the weight should be given to its conservation. It notes that 'this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'
- 3.15 The setting of a heritage asset is defined in Annex 2 as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'
- The NPPF states, at paragraph 195, that where a proposed development would lead to 'substantial harm' or total loss of heritage significance of a designated heritage asset, consent should be refused, '...unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss', or all of a number of specified criteria apply, including that the nature of the heritage asset prevents all reasonable uses of the site.
- 3.17 Where a development proposal will lead to *'less than substantial'* harm to the heritage significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 196).
- 3.18 Paragraph 197 states the effect of an application on the significance of a non-designated heritage asset requires a balanced judgement having regard to the scale of any harm or loss and the heritage significance of the heritage asset.
- 3.19 The NPPF requires local planning authorities to look for opportunities for new development within conservation areas and World Heritage Sites (WHSs) and within the setting of heritage assets to enhance or better reveal their heritage significance. Paragraph 200 goes on to say: 'Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably'.
- Paragraph 201 states 'Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance' and that 'Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area ... should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area ... as a whole'.

Planning Policy Guidance

- 3.21 The national Planning Practice Guidance (PPG) was launched on the 6th March 2014 and provides a web-based resource in support of the NPPF. It is updated on an ongoing basis, and the parts cited below are current at the time of writing (April 2022).
- 3.22 The PPG includes a section called 'Design: process and tools' which 'provides advice on the key points to take into account on design'. This was issued on 1 October 2019; it replaces a previous section called 'Design'.
- 3.23 The PPG deals with the processes of the planning system with respect to design, and notes that guidance on good design is set out in the National Design Guide.
- 3.24 The PPG includes a section called 'Historic environment' which was updated on 23 July 2019. It explains which bodies are responsible for the designation of HAs and provides information on heritage consent processes.
- 3.25 The PPG considers the factors that should inform decision taking about developments that would affect HAs. It notes that 'HAs 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 HA, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals...' (18a-007-20190723). It goes on to say 'understanding the significance of a heritage asset and its setting from an early stage in the design process can help to inform the development of proposals which avoid or minimise harm' (18a-008-20190723). It states that in assessing proposal, where harm is found, the extent of harm should be 'clearly articulated' as either 'substantial' or 'less than substantial' (18a-018-20190723).
 - The PPG notes that setting is defined in the NPPF and that 'all heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent' (18a-013-20190723). It goes on to say, 'the extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also

influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each' (18a-013-20190723).

3.27 With regard to non-designated HAs, the PPG notes that 'there are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence.' It states 'it is important that all non-designated heritage assets are clearly identified as such' noting it is 'helpful if local planning authorities keep a local list of non-designated heritage assets, incorporating any such assets which are identified by neighbourhood planning bodies' (18a-040-20190723).

The National Design Guide

- 3.28 The National Design Guide (September 2019) ('NDG') states (paragraph 3) that it 'forms part of the Government's collection of planning practice guidance'.
- 3.29 At paragraph 21 the NDG states that well-designed places are achieved by making the right choices at all levels, including:
 - 'The layout (or masterplan)
 - The form and scale of buildings
 - Their appearance
 - Landscape
 - Materials; and
 - Their detailing'
 - At paragraph 35 the NDG sets out ten characteristics which contribute to the character of places, nurture and sustain a sense of community, and address issues affecting climate. These are described as follows:
 - '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.
- Lifespan made to last.'

Historic England Advice Note 1 (Second Edition)

- Conservation Area Appraisal, Designation, and Management (2019)
- This note gives advice on managing conservation areas so that the potential of historic areas which are worthy of protection is fully realised, and provides information on conservation appraisals. The note emphasises that evidence required to inform decisions should be proportionate to the importance of the asset.
- It suggests a number of questions to assess the value of an unlisted building to the significance of a conservation area, provided its historic form and values have not been eroded. Any one of these characteristics could provide the basis for considering that a building may make a positive contribution to the special interest of a conservation area, i.e. its significance, subject to consideration of whether or not these values have been compromised. The questions are listed below. Appendix A to this report provides an assessment of the contribution of the buildings on the Site against this guidance.
 - 'Is it the work of a particular architect or designer of regional or local note?
 - Does it have landmark quality?
 - Does it reflect a substantial number of other elements in the conservation area in age, style, materials, form or other characteristics?
 - Does it relate to adjacent designated heritage assets (DHA) in age, materials or in any other historically significant way?
 - Does it contribute positively to the setting of adjacent designated heritage assets?
 - Does it contribute to the quality of recognisable spaces, including exteriors or open spaces with a complex of public buildings?
 - Is it associated with a designed landscape e.g. a significant wall, terracing or garden building?
 - Does it individually, or as part of a group, illustrate the development of the settlement in which it stands?

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- Does it have significant historic association with features such as the historic road layout, burgage plots, a town park, or landscape feature?
- Does it have historic associations with local people or past events?
- Does it reflect the traditional functional character or former uses in the area?
- Does its use contribute to the character or appearance of the area?'

Historic England: Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment (2015)

- This guidance, published by Historic England, provides information to assist in the implementation of historic environment policy in the NPPF and the related guidance given in the PPG. These include; assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.
- 3.34 The guidance notes at paragraph 4 that 'The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance. The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest'.
- 3.35 At paragraph 5, it is stated that 'The National Heritage List for England is the official database of all nationally designated heritage assets—see www.HistoricEngland.org.uk/listing/the-list. Non-designated heritage assets include those that have been identified in a Historic Environment Record, in a local plan, through local listing or during the process of considering the application. Archaeological potential should not be overlooked simply because it is not readily apparent'.
 - At paragraph 6, it is stated that 'Where the proposal is likely to affect the significance of heritage assets, applicants are encouraged to consider that significance at an early stage and to take their own expert advice, and then to engage in pre-application discussion with the local planning authority and their heritage advisers to ensure that any issues can be identified and appropriately addressed'. It goes on to set out several stages that indicate the order in which this process can be approached, although the reader is advised that while it is good practice to check individual stages 'they may not be appropriate in all cases and the level of detail applied should be proportionate'. It gives the following example:

'For example, where significance and/or impact are relatively low, as will be the case in many applications, only a few paragraphs of information might be needed, but if significance and impact are high then much more information may be necessary'.

3.37 The stages are as follows:

- Understand the significance of the affected assets
- Understand the impact of the proposal on that significance
- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF
- Look for opportunities to better reveal or enhance significance
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change
- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected'.
- At paragraph 52, it is noted that while there will not always be opportunities to enhance the significance or improve a heritage asset, 'the larger the asset the more likely there will be'. It acknowledges that 'most conservation areas, for example, will have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation'.
- 3.39 Paragraph 53 discusses design and local distinctiveness.

 With reference to the NPPF and PPG, it notes that 'In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:
 - The history of the place
 - The relationship of the proposal to its specific site
 - The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept
 - The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the

- grain of the surroundings, which includes, for example the street pattern and plot size
- The size and density of the proposal related to that of the existing and neighbouring uses
- Landmarks and other built or landscape features which are key to a sense of place
- The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces
- The topography
- Views into, through and from the site and its surroundings
- Landscape design
- The current and historic uses in the area and the urban grain
- The quality of the materials.'

Historic England: Historic Environment Good Practice Advice in Planning Note 3 (second edition): The Setting of Heritage Assets (2017)

- 3.40 This guidance provides 'information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties' and states that 'alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation, national policies and objectives'.
- 3.41 At paragraph 2 it states that 'The advice in this document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision... At the same time those taking decisions need enough information to understand the issues.'
- 3.42 At paragraph 9 it states that, 'setting is not a heritage asset, nor a heritage designation, although land compromising a setting may itself be designated...its importance lies in what it contributes to the significance of the heritage asset. This depends on a wide range of physical elements within, as well as perceptual and associational attributes pertaining to, the heritage asset's surroundings.'
- 3.43 At paragraph 11 the guidance sets out the type of views which contribute more to the understanding of the significance of a heritage asset, including those where the composition of the view '...was a fundamental aspect of the design or function of the heritage asset', those with unplanned or unintended beauty, those with historical or cultural associations, and those where relationships between the heritage asset and other assets or natural features or phenomena are relevant.

- At paragraph 18 the guidance states that 'conserving or enhancing heritage assets by taking their settings into account need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development'. It goes on to say that 'many places coincide with the setting of a heritage asset and are subject to some degree of change over time'.
- 3.45 The guidance proposes a five stage programme of assessment:
 - Identifying the assets and their settings which are affected:
 - 2. Assessing the degree to which setting makes a contribution to heritage significance;
 - 3. Assessing the effect of the development;
 - 4. Maximising enhancement and avoiding or minimising harm; and
 - Making and documenting the decision and monitoring outcomes.

Historic England Advice Note 4 – Tall Buildings (2022)

- This document sets out advice on planning for tall buildings within the historic environment. It supersedes Advice Note 4 issued by HE in 2015. It notes that "alternative approaches may be equally acceptable, providing they are demonstrably compliant with legislation and national policy objectives."
- 3.47 Paragraph 1.3 states that when planning for tall buildings it is important to avoid or minimise impacts on the significance of heritage assets, and principles to consider that help to do this include:
 - A plan-led approach to tall buildings to determine their location;
 - Evidence base exploring alternative options for location and heights;
 - Decision making informed by understanding of place, character and historic significance;
 - Tall building proposals which take account local context and historic character; and
 - Early and effective engagement at plan-making and decision-taking stages including the use of design review panels.

- 3.48 Paragraph 3.1 states that "In the right locations tall buildings can support major change or regeneration which positively influencing place-shaping and conserving the historic environment" and that "in the right place well-designed tall buildings can make a positive contribution." It notes that several tall buildings are listed.
- Paragraph 3.2 states that if a tall building is not in the right place, by virtue of its size and visibility. It can harm the qualities of place that people value. It continues that there are places which are so distinctive, where the level of heritage significance is so great, that tall buildings will be too harmful, regardless of the perceived quality.
- 3.50 Paragraph 3.3 notes that the following factors quality of place, heritage, visual, functional, environmental and cumulative need to be considered when determining the impacts of a tall building could have on the historic environment.
- 3.51 Paragraph 3.4 and 3.4 notes that tall buildings vary in their impact depending on their height, mass and locations, and what is considered tall depends on the nature of the local area. Definitions of tall buildings vary, but in general they should be informed by local character.
- 3.52 Section 4, Development plans, covers the production of development plans and tall building policies, summarising the main considerations for a plan led approach for tall buildings within the historic environment.
- Section 5, Developing proposals for tall buildings, stresses the need to have a good understanding of significance of any heritage assets that may be affected by the proposal, as well as the character of the place. It states that supporting information required describing the impacts on the historic environment should be proportionate, precise and accurate.
- Section 6, Assessing proposals, notes that many of the heritage implications that arise with proposals for tall buildings are the same for other applications, and advice set out in HE's GPA Managing Significance in Decision Taking note 2 is relevant. However, issues which frequently arise include location and height parameters; context and local character; high quality design; significance and risk of harm to the significance of heritage assets; and cumulative impacts.

Paragraphs 6.3 states that the key considerations for local authorities is the ability to secure public benefits from tall building developments. Paragraph 6.4 continues that the extent, nature and justification of public benefits will be carried out by decision makers in light of potential harm and long-term impacts on the significance of heritage assets and the integrity of historic townscapes. It states that the "conservation of the historic environment is itself a public benefit and secures its existence for future generations."

Historic England Advice Note 12 - Statements of Heritage Significance: Analysing Significance in Heritage Assets (2019)

- Historic England issued Advice Note 12, Statements of Heritage Significance: Analysing Significance in Heritage Assets in October 2019. The note covers the NPPF requirement that heritage significance is described in order to help local authorities make decisions on the impact of proposals for change to heritage assets. It states, in paragraph 2 of the introduction, that 'the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance.' It describes a statement of heritage significance as 'an objective analysis of significance, an opportunity to describe what matters and why'.
- 3.57 The advice note states that a staged approach to decision making, where the significance is assessed before the design of the proposal commences, is the best approach. It states in paragraph 29, under 'proportionality', that while 'analysis should be as full as necessary to understand significance, the description provided to the LPA need be no more than sufficient to understand the potential impact of the proposal on significance'.

Regional Planning Policy and Guidance

The London Plan, 2021

The London Plan 2021 was adopted in March 2021. It is the 'overall strategic plan for London' and sets out a 'framework for the development of London over the next 20-25 years'. The policies most relevant to townscape, visual impact and heritage are found in Chapter 3, 'Design', and Chapter 7, 'Heritage and Culture.'

3.60

- Policy D1 on 'London's form, character and capacity for growth' highlights the necessity for Boroughs to identify an area's capacity for growth by undertaking an assessment of the 'characteristics, qualities and values of different places'. This should include the consideration of urban form and structure, historical evolution and heritage assets, and views and landmarks.
- Policy D3 on 'Optimising site capacity through the design-led 3.61 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 policy states 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.' Development should 'respond to the existing character of a place', and 'provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest.' The policy further states that development design should 'be of high quality, with architecture that pays attention to detail,' and use 'attractive, robust materials which weather and mature well'
- 3.62 Policy D8 on 'Public realm' states that development plans and proposals should ensure that the public realm is '...well-connected, related to the local and historic context...'. It states that there should be 'a mutually supportive relationship between the space, surrounding buildings and their uses' and that development should 'ensure that buildings are of a design that activated and defines the public realm, and provides natural surveillance.'
- Policy D9 on 'Tall buildings' notes that the height of what is considered a tall building should be defined in development plans and identified on maps, and that although this will vary in different parts of London, 'should not be less than 6 storeys or 18 metres'. The policy also notes that 'tall buildings should only be developed in locations that are identified as suitable in Development Plans.'

- Policy D9 also notes that the views of buildings from different distances should be considered. This includes long-range views (developments should make a 'positive contribution to the existing and emerging skyline and not adversely affect local or strategic views'), mid-range views (developments should a 'positive contribution to the local townscape in terms of legibility, proportions and materiality'), and immediate views (developments should 'have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street'.). Proposals should 'take account of, and avoid harm to, the significance of London's heritage assets and their settings' and should 'positively contribute to the character of the area.'. It goes on to note that the architectural quality and materials should be of an exemplary standard. Buildings that are situated 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.' Buildings near the River Thames should protect the open quality of the river, including views.
- Policy HC1 on 'Heritage conservation and growth' notes that development proposals that affect heritage assets and their settings should 'conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings'.
- Policy HC3 on 'Strategic and Local Views' states 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.' The Mayor will identify Strategically-Important landmarks within designated views and will 'seek to protect vistas towards Strategically-Important Landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a Protected Vista'. The Mayor will 'identify and protect aspects of views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity and attributes.'
- Policy HC4 on the 'London View Management Framework' 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.' It notes that development should not be 'intrusive, unsightly or prominent to the detriment of the view', when it falls within the foreground, middle, or background of a designated view. With regard to protected vistas, development should protect and enhance, not harm, the viewer's ability to recognise and appreciate the strategically important landmark, and it should not harm the composition of the protected vista, whether it falls within the wider setting consultation area or not.



3.69

London View Management Framework Supplementary Planning Guidance (March 2012)

3.68 In March 2012 the Mayor published the 'London View Management Framework Supplementary Planning Guidance' ('LVMF') which is designed to provide further clarity and guidance on the London Plan's policies for the management of these views.

London's Natural Signatures: The London Landscape Framework, (prepared for Natural England, January 2011)

This guidance document was issued by Natural England in 2011. It divides London into 22 Natural Landscape Areas and identifies the key natural characteristics, or 'Natural Signatures', of those areas. The Site falls within area number 5, identified as Hampstead Ridge. The description of Hampstead Ridge states that:

'The dominant bedrock within the Landscape Area is London
Clay. The key exception to this is the area around
Hampstead Heath, an area of loam over sandstone
which lies over an outcrop of the Bagshot Formation
and the Claygate Member.'

Local Planning Policy and Guidance

Camden Local Plan (2017)

- 3.70 The Camden Local Plan covers the period from 2016-2031 and is 'a key document in Camden's development plan'.
- 3.71 Policy D1 states that design must be high quality and is required to:
 - 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,
- I. incorporates outdoor amenity space;
- m. preserves strategic and local views;

the skyline;

- n. for housing, provides a high standard of accommodation; and o. carefully integrates building services equipment.
- Policy D1 also states that the following points will be considered in relation to the construction of tall buildings:

 p. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects
 - q. the historic context of the building's surroundings;
 - r. the relationship between the building and hills and views;
 - s. the degree to which the building overshadows public spaces, especially open spaces and watercourses; and
 - t. the contribution a building makes to pedestrian permeability and improved public accessibility.
- 3.73 Policy D2 states that the Council will preserve the historic environment and will not allow the loss or substantial harm to designated heritage assets, unless the following criteria are applicable:
 - a. the nature of the heritage asset prevents all reasonable uses of the site;
 - b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
 - c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
 - d. the harm or loss is outweighed by the benefit of bringing the site back into use.
- 3.74 Policy D2 states that the Council will take the following measures to preserve or enhance listed buildings:
 - i. resist the total or substantial demolition of a listed building;
 - j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
 - k. resist development that would cause harm to significance of a listed building through an effect on its setting.

3.75 Policy D2 states that the Council will also protect nondesignated heritage assets, including locally listed buildings. On this, it states:

> The effect of a proposal on the significance of a nondesignated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

Camden Supplementary Planning Guidance on Design (January 2021)

- 3.76 The Camden Supplementary Planning Guidance on Design supports the policies in the Camden Local Plan 2017. It covers issues concerning housing, sustainability, amenity and planning obligations. It expands on the application of Camden Local Plan Policy D1 Design and Policy D2 Heritage.
- 3.77 Policy 3.6 notes that conservation areas are not established to hinder all future development, but that they should encourage 'managed' change to 'conserve and where possible enhance the historic significance of the area as a whole'.
- Policy 3.7 notes that the following features have the potential to positively contribute to a Conservation areas special character, quality, heritage value and interest:
 - The architectural design and uses of the buildings
 - The layout and arrangement of buildings
 - The quality of open space and trees in the area
 - The street pattern
 - Individual buildings of significance
 - Street furniture
- .79 Policy 3.35 states that 'the Council will not permit the loss or substantial harm to a designated heritage asset unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or particular circumstances apply.'
- 3.80 Policy 3.38 states that the conservation of heritage assets should be prioritised.
- .81 Policy 3.40 states the each heritage asset contributes something unique and the assessment process should reflect this. It states: 'each heritage asset has its own special significance and therefore each application or assessment of a proposal will be based on its own merit.'

- Policy 3.43 states that the cumulative impact will also be considered in the assessment of heritage assets. It states that 'the Council will, in additional to considering proposals on an individual basis, also consider whether changes could cumulatively cause harm to the overall heritage value and/or integrity of the relevant Conservation Area, Listed building or heritage asset'.
- Policy 3.45 states that new development that is proposed or in close proximity to a heritage asset should be sensitively integrated into the historic environment.
- 3.84 Policy 3.46 states that development should enhance the historic environment and the setting of heritage assets where there are opportunities to do so. It states: 'Development must respect local character and context and seek to enhance the character of an area where possible'.
- 3.85 Policies 3.48 and 3.49 recognises that Non-Designated Heritage Assets should also be considered alongside new development.
- 3.86 Policy 3.52 refers to Camden's Local List as a 'valuable resource' which should be used 'to ensure that the significance of any asset deemed a non-designated heritage asset is carefully considered by the Council in decision making.'

4. Historical Development

Location

4.1 The Site is located in The London Borough of Camden, within the Kilburn Ward. It has a triangular shape and is bound by Abbey Road, Belsize Road and the private gardens of residential terraced houses on Priory Terrace. It sits between West Hampstead, Swiss Cottage and St John's Wood, close to the boundary with Westminster.

Historic development of the area

- John Shaw, an architect influenced by the town-planning ideals of the 18th century, directed development in the area from 1802. Abbey Road was developed in a northward direction and is marked on the Greenwood map from 1828 (figure 4.2). During the 18th century, the area was populated by residential, commercial and institutional buildings, including Swiss Cottage tavern, The North Star public house (1850) and a school for the blind (1848). Community orientated development, including healthcare facilities and places of worship also occurred in this period.
 - In the early and mid-1800s St John's Wood accommodated professional and commercial classes who lived with servants. However, this began to change at the end of the 19th century when housing was built to serve a slightly lower social class (figure 4.3) and there was development around the London and North Western Railway (LNWR). West of the Site, Kilburn & Maida Vale Station (now known as Kilburn High Road railway station), was opened in 1852. East of the Site, Loudon Road station (now known as South Hampstead railway station), was opened in 1879. By the end of the 19th century, the area was predominantly comprised of detached and semi-detached houses and generally St Johns Wood was occupied by the middle and upper class. Smaller properties and mews were occupied by stablemen, craftsmen, clerks, agents and tradesmen.

- Lodging accommodation and institutions occupied some of the larger houses by 1900 and in the 1930s, some buildings were redeveloped into flats. East of the Site, the area between Finchley Road and Avenue Road was redeveloped in 1937 for the construction of the Odeon cinema. Re-building continued into the mid-20th century with the rise of postwar social housing. This addressed the dilapidated condition of neglected and bomb damaged buildings and transformed much of the land east of the Site (figure 4.6). For example, The Hilgrove estate was established between Belsize Road and Boundary Road, intercepted by Hilgrove Road. Directly south-east of the Site, in the 1970s, Alexandra Road was redeveloped with stepped concrete housing and a park. This is now part of the Alexandra & Ainsworth Estate.
- Although much of the architecture from the 19th century was replaced by development in the 20th century, some mid-19th century houses remain. Perceptions of the area declined in the 19th-20th century however, more recently, the significance of some of the architecture from the 20th century has been recognised. For example, Alexandra Road Estate was listed at Grade II* in 1993. Furthermore, Abbey Road gained cultural significance due its association with the music industry through Abbey Road Studios (1km to the south of the Site). The studios opened in the 1900s and attracted famous clients including The Beatles.

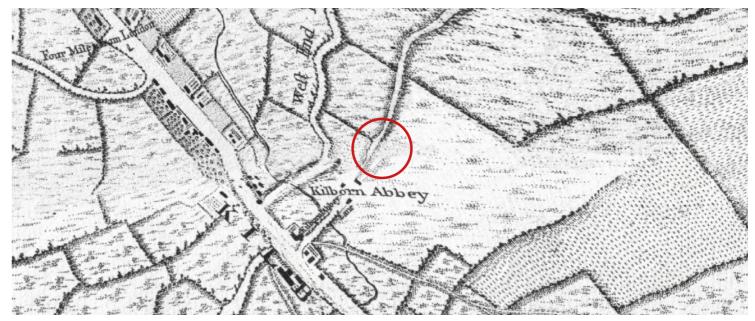


Fig. 4.1: John Rocque Map, 1746.



Fig. 4.2: C. & J. Greenwood Map, 1828.

Site specific history

- 4.6 The John Rocque map (1746) and Greenwood map (1828) show that during the 19th century the land that comprised the Site was undeveloped (figure 4.1 and 4.2). By the end of the 19th century, the roads that enclosed the Site, including Abbey Road, Belsize Road and St George's Road were established (figure 4.4). Albert Mews was connected to Belsize Road and intercepted the Site. The eastern corner of the Site was occupied by a hotel. The buildings on Site on Albert Mews and those fronting Belsize Road and Abbey Road occupied narrower plots than the surrounding terraces, notably those on St George's Road. North of the Site, St Mary's Parish Church was built in 1856-62, still stands today and is Grade II listed.
- 4.7 The names of the roads that enclose the Site have changed since they were established in the 19th century. In maps from the 19th century, Abbey Mews is marked as Albert Mews and Priory Terraced is marked as St George's Road (figure 4.4).
- 4.8 The 1945 Bomb Damage Map shows that the Site suffered bomb damage during the Second World War (figure 4.6). Properties on Site fronting Belsize Road appear worse affected, with some shaded black to denote 'total destruction'. In the 1940-60 OS map, this area on the Site is empty and on the north-eastern corner of the Site, there is a public house which replaced the 19th century hotel.
- The Abbey Estate was built in 5 stages (figure 4.9) in the 1960s and the Site is currently occupied by 'stage 5' (figure 4.10). It features two housing blocks, Emminster and Hinstock, reaching up to 8 storeys, with small retail units at ground floor level. Additionally, on the southern end of the Site, there is a community centre and there is a health centre sandwiched between the two blocks. The Estate was designed by Sydney Cook who was Camden Borough Architect from 1965 to 1973. Throughout his career, he championed low-rise and high-density housing and sought to advance quality of living through architecture. This reflected the progressive and left-wing politics of the borough at the time.

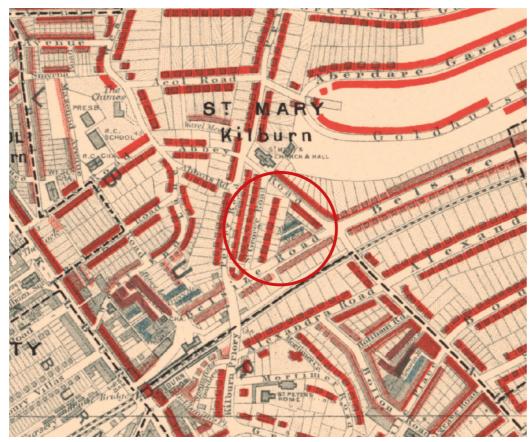


Fig. 4.3: Charles Booth's Poverty Map, 1886-1903.



Fig. 4.4: OS Map, 1893-6.

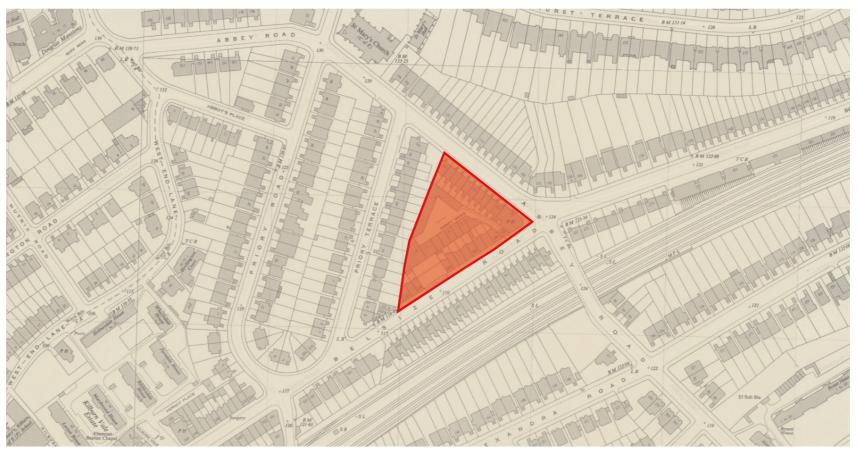


Fig. 4.5: OS Map, 1940-60.



Fig. 4.6: Bomb Damage Map, 1945.



 $Fig.\ 4.8:\ \ Abbey\ Estate,\ view\ of\ Emminster\ block\ from\ Belsize\ Road,\ 1988.$



Fig. 4.7: View of Belsize Park from Abbey Road, 1906.



Fig. 4.9: View of Belsize Park from Abbey Road, 2011.