

# Heritage Statement: Addendum

Camden Goods Yard: PFS Site - Juniper Building Revisions

August 2022

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**Client**

St George West London Limited

**Our reference**

STGH3003

August 2022

# 1. Introduction

- 1.1 This Heritage Statement Addendum has been prepared by Turley Heritage on behalf of St George West London Limited (the 'Applicant'), to assess the built heritage impacts of the proposed third minor material amendment s73 application (the 'July 2022 s73 application') for redevelopment of the petrol filling station site and main supermarket sites; namely for: removal of petrol filling station; reconfiguration of the ground floor to incorporate additional office and retail floorspace, mezzanine level and electric vehicle charging station; internal reconfiguration of 2nd floor plan; extension of building west by approximately 6 metres resulting in an additional 1,900 sqm (GEA) (comprising the 'July 2022 amended proposed development').
- 1.2 The Planning Statement prepared by Quod identifies the planning history for the application site. In summary, the Camden Goods Yard project was granted full planning permission in June 2018 (the 'June 2018 consented scheme') (planning reference: 2017/3847/P). That planning permission has subsequently been superseded by two minor material amendment applications, the 'May 2020 consented scheme' (reference: 2020/0034/P), and the 'December 2020 consented scheme' (reference: 2020/3116/P).
- 1.3 The proposed amendments now sought through the July 2022 S73 application seek to amend the extant planning permission (the December 2020 consented scheme). This third minor material amendment application is for amendments to the PFS parcel only. No amendments are proposed to the Morrisons supermarket (MS) parcel consented proposals. The proposed amendments bring the planning permission up to date to enable the delivery of a high quality office building on the PFS parcel, in this important town centre location. The proposed amendments, identified in detail within the Design and Access Statement are summarised for ease of reference:
- Removal of Petrol Filling Station.
  - Reconfiguration of ground floor layout to accommodate:
    - Additional improved office and retail floorspace and back of house functions;
    - Enlarging the office lobby;
    - Introducing an office lobby-café;
    - Including a dedicated office cycle entrance;
    - Introducing an office mezzanine level; and
    - Replacing the Petrol Filling Station with an electric vehicle (EV) charging station (comprising four public bays).
  - Extending the building 6 metres resulting in the creation of additional office floorspace across all levels (2,207 sqm GIA) and an additional ground floor retail unit (50 sqm GIA).

- Introduction of a mezzanine level to the first floor.
- Ground floor windows added to the western elevation adjoining the consented Youth Space (also within PFS site) to the west.
- Building footprint to the east adjusted (shifted 390mm westwards to improve pavement widths by 0.4m).
- Internal reconfiguration of the Corner Building by converting the retail (F&B) floorspace on Level 2 (197 sqm GIA) to office floorspace whilst retaining retail (F&B) at levels 1, 3 and 4 including the winter garden.
- Reconfiguration of Morrisons floorplan to widen the frontage by one bay and reduce depth of unit to facilitate improved trading and back of house operations.
- Rationalisation of plant space at ground floor enabling the omission of plant from 2nd floor.
- Reconfiguration and optimisation of plant at roof level.
- Introduction of a rear ground floor office yard terrace.
- Minor extension to fifth floor office terrace.

1.4 This Addendum report is a Technical Appendix to the July 2022 Environmental Information Letter (EIL) and summarises the findings of an updated environmental impact assessment undertaken of the proposed amendments and the amended proposed development as a whole (the 'July 2022 amended proposed development'). The July 2022 EIL should be read in conjunction with the 2017 ES (as amended).

1.5 The Heritage Statement Addendum in this report should also be read in conjunction with the following built heritage assessments contained within the 2017 ES (as amended):

- June 2017 Environmental Statement (ES) Volume 2B Heritage Assessment (including Heritage Statement) that accompanied the 2017 full planning application.
- Supplementary Report: Impact of Proposed Development on Regent's Park (October 2017).
- January 2020 Environmental Implications Letter (EIL) that accompanied the January 2020 S73 application.
- July 2020 EIL and Heritage Statement that accompanied the July 2020 S73 application.

1.6 The accurate visual representations (AVRs) contained within Appendix 9 of the July 2022 EIL have informed the assessment in this report.

1.7 As noted earlier in this Section, the built heritage impacts of the July 2022 proposed amendments and of the amended proposed development as a whole, have been

assessed in their entirety in this Heritage Statement Addendum, in respect of the conclusions of built heritage assessments contained within the 2017 ES (as amended).

1.8 This report does not consider archaeological heritage matters.

### **Report Structure**

1.9 The structure of the report is:

- **Section 2:** Review of relevant legislative and policy context.
- **Section 3:** Review of built heritage baseline.
- **Section 4:** Impact assessment of the July 2022 amended proposed development.
- **Section 5:** Summary and Conclusions.

## 2. Review of Legislative and Policy Context

### Statutory Duties

- 2.1 The relevant legislation relating to built heritage matters remains extant, unchanged and valid. This includes s66 and s72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

### National Planning Policy Framework

- 2.2 The National Planning Policy Framework (NPPF) has been updated and re-published, since the heritage assessment reports were prepared. The most recent version, published in July 2021, sets out the government's planning policies for England. The policies specific to built heritage matters, relevant to the July 2022 amended proposed development, are not materially different from those in the 2019 version; however, several the paragraphs have been re-numbered. The following paragraphs are relevant to the July 2022 amended proposed development:

- In determining applications, local planning authorities should; require applicants to describe the significance<sup>1</sup> of heritage assets affected, including any contribution to made by their setting (194); and should identify and assess the particular significance of any heritage asset that may be affected by proposals (195). The latter should be considered when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the conservation of heritage assets and any aspect of the proposal.
- Generally, local planning authorities should take account of; the desirability of sustaining and enhancing the significance of heritage assets; the positive contribution that conservation of heritage assets can make to sustainable communities; and the desirability of new development making a positive contribution to local character and distinctiveness (197).
- Great weight must be given to the conservation<sup>2</sup> of a designated heritage asset<sup>3</sup> when considering the impact of proposed development – noting that the more important the asset, the greater the weight should be (199) and that this applies irrespective of whether any potential harm amounts to substantial harm or less than substantial harm.
- Any harm to the significance of a designated heritage asset should require clear and convincing justification and substantial harm to (or loss of); grade II assets,

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<sup>1</sup> NPPF Annex 2: Glossary, **Significance (for heritage policy)**: The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

<sup>2</sup> NPPF Annex 2: Glossary, **Conservation (for heritage policy)**: The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

<sup>3</sup> NPPF Annex 2: Glossary, **Designated heritage asset**: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

should be exceptional; assets of the highest significance, should be wholly exceptional (200).

- Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal (202).
- The effect of a proposal on the significance of a non-designated heritage asset<sup>4</sup> should be considered in the determination of the application – requiring a balanced judgement having regard to the scale of any harm or loss and the significance of the asset (203).
- Local planning authorities should look for opportunities for new development within conservation areas and the setting<sup>5</sup> of heritage assets, to enhance or better reveal their significance – noting that proposals that preserve those elements of setting that make a positive contribution to the asset should be treated favourably (206).
- The NPPF notes that not all elements of a conservation area will necessarily contribute to its significance and that loss of a building which makes a positive contribution to significance should be treated as either substantial or less than substantial harm, taking account of relative significance of the element affects and its contribution to the significance of the conservation area, as a whole (207).

## Development Plan

### London Plan

2.3 The new London Plan was adopted by the Greater London Authority in March 2021 and sets out the Spatial Development Strategy for all Boroughs within Greater London for the next 20-25 years and replaces the 2011 London Plan and all iterations from 2004-2016.

2.4 **Policy D1 London's form, character and capacity for growth** seeks to establish the character and context of an area to understand how different places may develop in the future.

*'A) Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. Area assessments should cover the elements listed below:*

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<sup>4</sup> NPPF Annex 2: Glossary, **Heritage asset**: 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).

<sup>5</sup> NPPF Annex 2: Glossary, **Setting of a heritage asset**: 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.

1) demographic make-up and socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics)

2) housing types and tenure

3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density)

4) existing and planned transport networks (particularly walking and cycling networks) and public transport connectivity

5) air quality and noise levels

6) open space networks, green infrastructure, and water bodies

7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character)

8) topography and hydrology

9) land availability

10) existing and emerging Development Plan designations

11) land uses

12) views and landmarks.'

2.5 **Policy D3 Optimising site capacity through the design-led approach** seeks to ensure development is most appropriate for the site through an evaluation of its attributes, its surrounding context, and its capacity for growth. It states that development proposals should consider factors such as form and layout, experience as well as the quality and character. In relation to the quality and character, development should, regarding built heritage matters:

*'...11) respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character...'*

2.6 **Policy HC1 Heritage conservation and growth** relates to the protection of London's heritage, with the following paragraph being relevant to the determination of the July 2022 amended proposed development:

*'...C. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process...'*



## Camden Development Plan Documents

2.7 The Camden Local Plan (2017), Camden Site Specific Allocations (2013) and Camden Goods Yard Planning Framework (2017) remain unchanged from the July 2020 Heritage Statement Addendum.

2.8 The Council has prepared a draft Site Allocations document in 2020, which includes the application site as part of the wider Camden Goods Yard allocation. Draft Policy CGY1 states, regarding built heritage matters:

*“The Camden Goods Yard area has the potential to become a vibrant and dynamic new neighbourhood that will deliver a significant increase in the number, mix, type and affordability of homes in the area and provide a range of retail and employment spaces. To ensure that the area will realise its full development potential, proposals within this area must:*

*... d. Responding appropriately to the predominant scale and heights of the surrounding townscape and preserve or enhance local heritage assets and their settings, in particular The Roundhouse, the Interchange building and The Winding Vaults.*

*e. Draw upon and celebrate the area’s industrial, canal and transport heritage in the design of new development and take opportunities to raise understanding and appreciation of surviving assets and their history*

*f. Protect the view designated by the London View Management Framework from Parliament Hill summit to the Palace of Westminster and take into account locally significant townscape views and views to/from surrounding conservation areas...”*

2.9 The amended proposals for the PFS parcel are broadly consistent with the draft Site Allocation CGY3, which states, with regard to built heritage considerations:

*“Redevelopment of the site will be supported to provide a mix of uses. The Council requires a employment-led development with retail and café/restaurant uses at ground floor level. An element of permanent self-contained housing may also be supported subject to a good standard of amenity being provided. Development must be in accordance with Policy CGY1 – Camden Goods Yard Area, and in addition must meet the following requirements specific to this site:*

*... b. Provide architecture of the highest standard which acts as a visible marker for the entrance to the wider Goods Yard.*

*c. Be successfully integrated with adjoining land (and future proposals) for 100, 100a and 100b Chalk Farm Road to allow development to be optimised and the townscape along Chalk Farm Road to be enhanced, with the area of scrubland developed subject to the consented youth space being reprovided elsewhere. This should draw on the historic context and character of this part of the Town Centre and carefully consider the impact of development on locally important views and the setting of the Horse Hospital/Stables Market and listed walls.*

*d. Setback the building line along Chalk Farm Road to deliver a widened pavement, providing an improved route towards Chalk Farm Road station.*

*e. Contribute to a more engaging frontage on the south side of Chalk Farm Road drawing on the historic context and character of this part of the Town Centre...”*

## **Other Guidance and Material Considerations**

2.10 The following guidance documents have been updated or superseded since the preparation of the built heritage assessments within the 2017 ES (as amended).

- **Historic England Advice Note 7 (Local Heritage Listing) (2<sup>nd</sup> Edition)**: this document provides a comprehensive guide to local heritage listing in England, which highlights good practice in the development of local heritage lists and presents a set of commonly applied set of selection criteria used to assess the suitability of heritage assets for local listing.
- **Camden Planning Guidance: Design (2021)**: this is an adopted supplementary planning document, which supports the policies of Camden’s Local Plan. It provides further guidance on topics within the borough, including heritage and replaces the previous 2019 version. The built heritage assessments within the 2017 ES (as amended) were prepared having regard to the 2019 version of this document. The current 2021 version remains consistent with the 2019 version.

2.11 These documents have been used to inform the updated impact assessment contained in this Addendum. The built heritage assessments within the 2017 ES (as amended) comply with the requirements of this best practice advice.

### 3. Review of Built Heritage Baseline

- 3.1 A review of the National Heritage List for England, and the LBC’s website, confirms that no additional built heritage assets have been identified within the study area<sup>6</sup>, since the built heritage assessments within the 2017 ES (as amended).
- 3.2 Having regard to the nature and scope of the July 2022 s73 application, comprising amendments to the consented proposals for the PFS parcel, only the significance of the built heritage assets summarised in **Tables 3.1 – 3.3** have the potential to be affected and, therefore, require assessment for the purposes of this Addendum.
- 3.3 The July 2022 proposed amendments do not propose any changes to the consented development on the MS parcel, the development of which remains in accordance with the December 2020 consented scheme. On that basis, it is not necessary to consider the effects of that element of the July 2022 amended proposed development on the significance of the other built heritage assets identified within the 2017 ES (as amended), which remain unchanged.

**Table 3.1: Statutorily Listed Buildings within 500m of the PFS Parcel**

Number on Heritage Asset Plan	Name	Grade
1	Horse Hospital with ramps and boundary wall at north of site	II*
10	The Roundhouse	II*
13	Chalk Farm Underground Station	II

**Table 3.2: Conservation Areas within 500m of the PFS Parcel**

Number on Heritage Asset Plan	Name	Date of Designation
1	Regent’s Canal Conservation Area	25 April 1974

<sup>6</sup> The ‘Heritage Study Area’ comprises:

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

**Table 3.3: Locally Listed Buildings/Non-Designated Heritage Assets within 500m of the PFS Parcel**

Number on	HeritageName
Asset Plan	
1	Nos.2-8 (even) Ferdinand Street
3	Nos.36-37 Chalk Farm Road

## 4. Impact Assessment

### Introduction

- 4.1 The relevant built heritage policy and guidance context for consideration of the July 2022 amended proposed development is set out in the 2017 ES (as amended) and as amended by Section 2 of this report. This includes:
- the statutory duties of the Planning (Listed Buildings & Conservation Areas) Act 1990 including the requirement to have special regard to the desirability of preserving the special interest of a listed building and any elements of setting, which contributes positively to this special interest and to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Importantly, however, the setting of a conservation area is not enshrined in the legislation and does not attract the weight of statutory protection<sup>7</sup>;
  - national policy set out in the NPPF; and
  - local policy for the historic environment and other relevant material considerations.
- 4.2 Great weight and importance should be placed on; the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.
- 4.3 The NPPF also highlights that when considering the impact of proposals on the significance of designated heritage assets, great weight should be given to their conservation, and the more important the asset the greater the weight should be.

### Context to Impact Assessment

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

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

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<sup>7</sup> APP/H1705/A/14/2219070

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

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

### **Heritage Impact Assessment**

- 4.6 The July 2022 proposed amendments do not propose any changes to the consented development on the MS parcel, the development of which remains in accordance with the December 2020 consented scheme. It is, therefore, not necessary to consider the impacts of that element of the July 2022 amended proposed development on the significance of the heritage assets as part of this report.

### **Statutorily Listed Buildings**

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

- 4.7 The Horse Hospital is a spatially complex listed building, split over two levels, linked by a curved, gently rising ramp, originally designed to allow access for horses to the upper levels. It forms part of the dense and layered Camden Market complex, with the associated ‘bazaar’ character arising from its latter patterns of use.
- 4.8 The listed building and July 2022 amended proposed development would be experienced in conjunction with each other from outside of the market, as part of a varied urban townscape context, primarily as part of the kinetic experience of moving along Chalk Farm Road (Views 21, 22, 29 and 31) and in linear views along Harmood Street, Hartland Road and Ferdinand Street.
- 4.9 When experienced at street level, within the Camden Market complex, the July 2022 amended proposed development would have a variable effect on the significance of the heritage asset, due to the scale of interposing, recent market buildings and the railway viaduct, and the associated sense of enclosure.
- 4.10 The amended development proposals for the PFS parcel would have a significant, albeit localised presence, from the first floor ramp of the Horse Hospital experienced as part of the varied commercial and entertainment complex. The amended proposed development proposals for the PFS parcel would deliver transformational change, with a new high quality building of an appropriate scale and form that responds to the existing and emerging context. As outlined in the Design and Access Statement for the July 2022 S73 application, the design of the amended proposed building has been developed from an understanding of the previous functions and history of this part of the application site as an element of the historic Camden Goods Yard, interpreted in a contemporary manner. This includes, for instance, the reinstatement of the building line of the former wall of Camden Goods Yard, emphasised using a dark brick ‘plinth’.

- 4.11 The removal of the PFS would have a minor beneficial effect on the setting of the listed building by omitting the 'gap' in the frontage in the southern elevation visible from the upper levels of the listed building. The other proposed amendments would have no additional or changed effects on the significance of the listed building when compared to the December 2020 consented scheme.
- 4.12 Consistent with the December 2020 consented scheme, the July 2022 amended proposed development would have no effect on the internal qualities, fabric, features or experience of the stables that makes an important contribution to the special interest of the listed building.
- 4.13 In those terms, the nature and extent of the July 2022 amended proposed development would not materially change the previously established effects of the December 2020 consented scheme on the significance of this listed building. Accordingly, the July 2022 amended proposed development would continue to preserve the special interest and setting of this listed building.

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

- 4.14 The Roundhouse is a distinctive building, whose form and internal layout provide a clear indication of its varied historic functions and associations with the operation of the Camden Goods Yard. Latterly, it has become an important and well-known cultural and performance venue. Its setting has been subject to extensive change and it is now the proximity to the railway lines and the remaining built elements of the 19<sup>th</sup> century railway complex that make a strong contribution to an understanding of its heritage significance as elements of setting.
- 4.15 The amended development proposals for the PFS parcel would be a new element in the local townscape context of the listed building, being experienced in the context of the existing building at Nos.100, 100a and 100b Chalk Farm Road. Notwithstanding the proposed minor increase in the scale and massing of the July 2022 amended proposed development, the proposed building on the PFS parcel would remain consistent with the scale and character of the existing and emerging townscape setting of the listed building (View 21). As outlined in the Design and Access Statement for the July 2022 S73 application, the design of the amended proposed building has been developed from an understanding of the previous functions and history of this part of the application site as an element of the historic Camden Goods Yard, interpreted in a contemporary manner. This includes, for instance, the reinstatement of the building line of the former wall of Camden Goods Yard, emphasised using a dark brick 'plinth'.
- 4.16 In the kinetic visual experience of moving south-east along Chalk Farm Road, where the distinctive form and silhouette of the listed building is best appreciated, the July 2022 amended proposed development would be largely hidden by the interposing No.100 Chalk Farm Road, to its west (View 21). The July 2022 amended proposed development would appear beyond No.100 Chalk Farm Road with the uppermost levels set back and recessive in this experience of the listed building in the townscape context. The Roundhouse roof in the foreground would remain taller and the more prominent element in view, sustaining an appreciation of its distinctive silhouette as part of its architectural interest. The July 2022 amended proposed development would have no effect on an understanding of the building's internal form and appearance, which

provide the strongest indication of its varied historic uses as the basis of its special interest.

- 4.17 In those terms, the July 2022 amended proposed development would sustain the significance of the listed building and would not, therefore, change the previously assessed July 2022 amended proposed development effects of the December 2020 consented scheme, which identified that the development of the MS parcel caused a minor degree of less than substantial harm to the special interest of the listed building.

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

- 4.18 In light of the particular significance of this listed building, as a distinctive example of Leslie Green's high-quality Edwardian Baroque 'house style' station design for the Charing Cross, Euston & Hampstead Railway (CCE&HR) and the City & South London Railway (C&SLR), and the particular contribution made by its varied and bustling urban townscape setting to that significance, the minor nature and extent of the July 2022 amended proposed development would not materially change the previously established effects of the December 2020 consented scheme. Accordingly, the July 2022 amended proposed development would preserve the special interest and setting of this listed building as a high-quality Edwardian tube station.

**Conservation Areas**

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

- 4.19 The significance of the conservation area is derived from the almost hidden nature of the canal, which creates a tranquil space, distinct from the surrounding area, and the planning, layout, and varying levels of the canal's route, which contribute to its character. The industrial buildings, structures and archaeology also form an important part of its historic character and appearance, as does the changing and varying character along different sections of the canal. The conservation area's setting is formed of the dense urban townscapes of Camden Town and Kentish Town, which consist of differing architectural styles and character, although principally of 19<sup>th</sup> century date. This built form is representative of the development of the surrounding area and contributes to the changing character of the canal along its length. The railway line and elements of the former Goods Yard, which form part of the immediate setting, are reminiscent of the former function of the canal and as such, make a positive contribution to significance.
- 4.20 As before, the July 2022 amended proposed development would have a direct impact on the significance of the conservation area. The application site does not contribute positively to the character or appearance of the conservation area and there is an opportunity for high-quality new development to sustain or enhance its contribution to that significance.
- 4.21 The July 2022 amended proposed development would be a major new element in this localised part of the conservation area (Views 21, 22, 29 and 31). As previously, it would transform the application site and deliver a new high quality building of an appropriate scale and form that responds to the existing and emerging townscape context of this part of the conservation area. As outlined in the Design and Access Statement for the July 2022 S73 application, the design of the amended proposed building has been developed from an understanding of the previous functions and history of this part of the application site as an element of the historic Camden Goods Yard, interpreted in a



contemporary manner. This includes, for instance, the reinstatement of the building line of the former wall of Camden Goods Yard, emphasised using a dark brick 'plinth'.

- 4.22 The July 2022 amended proposed development would 'repair' the streetscene in this part of the conservation area, with the removal of the PFS element, reinforcing the creation of a defined street edge to this part of the conservation area. The removal of the PFS would reinforce the creation of a strongly defined street edge, by improving the extent of active frontages at ground floor, consistent with the varied use character of the conservation area and by removing vehicles crossing the pavements to enter the PFS.
- 4.23 The increase in the width of the proposed building, reconfiguration of plant at roof level and other external alterations would retain the scale, form, overall height, quality and character of the consented building. In those overall terms, the July 2022 amended proposed development, would sustain the significance of the conservation area through the transformation of an incongruous and unattractive site, which forms a sizeable element of its setting and a poor quality element of the designated area at the interface of the Site with Chalk Farm Road, consistent with the findings of the assessment of the December 2020 consented scheme.

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

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

- 4.24 The locally listed buildings are modest, late 19<sup>th</sup> century examples of the well-established urban typology of residential accommodation above commercial/retail units. They are attractive, typical examples of this typology, constructed of stock brick with contrasting red brick dressings, albeit the painting of much of the first floor brickwork has obscured this detailing. The setting of these properties is highly variable.
- 4.25 The July 2022 amended proposed development would deliver a new high quality building of an appropriate scale and form that responds to the existing and emerging townscape context of the locally listed building. As outlined in the Design and Access Statement for the July 2022 S73 application, the design of the building has been developed from an understanding of the previous functions of this part of the application site as an element of the historical Camden Goods Yard and interpreted in a contemporary character. This includes, for instance, the reinstatement of the building line of the former wall of Camden Goods Yard, emphasised using a dark brick 'plinth'. The resulting building is consistent with the historic distinction between the Camden Goods Yard and the wider Camden Town context, of which the locally listed buildings form a part. The July 2022 amended proposed development would maintain the character and form of the new relationships assessed in the context of the December 2020 consented scheme and would enhance the significance of this non-designated heritage asset as a new element of its setting.
- 4.26 In overall terms, the local heritage significance of these buildings would be sustained by the July 2022 amended proposed development, with the redevelopment of the PFS parcel enhancing an element of their setting, consistent with the previously assessed effects of the December 2020 consented scheme.

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

- 4.27 This building is principally of architectural interest as an imposing, eclectic and high-quality example of later 19<sup>th</sup> century Italianate commercial architecture. It forms an attractive corner building, which defines the street junction of Chalk Farm Road and Harmood Street; best appreciated when approaching from the south along Chalk Farm Road. The urban context of the building is highly variable, and the contribution made by setting is therefore not consistent. Where remnants of the 19<sup>th</sup> and early 20<sup>th</sup> century townscape context survive, it contributes positively to their significance by virtue of shared materiality, scale and character and from what it helps to illustrate about the origins of the buildings and local area.
- 4.28 The July 2022 amended proposed development would deliver a new high quality building of an appropriate scale and form that responds to the existing and emerging context of the locally listed buildings. As outlined in the Design and Access Statement for the July 2022 S73 application, the design of the building has been developed from an understanding of the previous functions of this part of the application site as an element of the historical Camden Goods Yard and interpreted in a contemporary character. This includes, for instance, the reinstatement of the building line of the former wall of Camden Goods Yard, emphasised using a dark brick 'plinth'. The resulting building is consistent with the historic distinction between the Camden Goods Yard and the wider Camden Town context, of which the locally listed building forms a part. Given the separation distances between this element of the application site and the heritage asset, the July 2022 amended proposed development would be a new element of background townscape context when moving north, or a new foreground element when approaching from the north. In either scenario, the July 2022 amended proposed development would not impair an understanding or legibility of the building's local heritage significance, which would be sustained.
- 4.29 Accordingly, consistent with the assessment of the December 2020 consented scheme, the July 2022 amended proposed development would sustain the local heritage significance of this building.

### **Summary of Heritage Impact of July 2022 Amended Proposed Development**

- 4.30 Like the December 2020 consented scheme, the July 2022 amended proposed development has been conceived based on a detailed understanding of the constraints of the application site, including the particular significance of heritage assets within the study area; the remarkable opportunity to revitalise this part of Camden; and, to reintegrate the application site into the wider townscape context. The impacts of the July 2022 amended proposed development, both beneficial and harmful, are derived directly from this ambition to deliver a transformational scheme. As such, they are interrelated, and the overall effects of the July 2022 amended proposed development upon the significance of the relevant built heritage assets must be considered in their entirety, having regard to the substantial public benefits (widely defined for the purposes of the NPPF), which would be delivered.
- 4.31 In overall terms, consistent with the assessment of the impacts of the December 2020 consented scheme, the July 2022 amended proposed development sustains, and, to a degree, enhances the particular significance of a wide range of the heritage assets identified within the study area, including the contributions made by setting to that

significance. In those terms, the July 2022 amended proposed development is consistent with the relevant statutory duties of the 1990 Act and the requirements of the NPPF.

4.32 The July 2022 amended proposed development would not amplify or otherwise alter the previously established levels of heritage harm from development of the MS parcel, which remains less than substantial for the purposes of the NPPF and ‘calibrated’ as comparatively modest in all instances:

- The Roundhouse (Grade II\* listed building).
- The Interchange Building (Grade II listed building).
- Nos.1-15 Prince Albert Road (Grade II listed buildings).
- Primrose Hill Infants School (Grade II listed building).
- The Engineer PH (Grade II listed building).
- Primrose Hill Conservation Area.
- Harmood Conservation Area.
- Regent’s Park (Grade I Park and Garden of Special Historic Interest).

4.33 The Planning Statement provides the clear and convincing justification for that heritage harm (paragraph 200 of the NPPF).

4.34 The identified less than substantial harm must be weighed in the balance against the public benefits, which include heritage benefits, as required by paragraph 202 of the NPPF and must be accorded great weight and importance (paragraph 199 of the NPPF).

4.35 In this instance, the overarching public benefits are directly linked to the redevelopment of this important but underutilised site and the creation of a high-quality new neighbourhood and delivery of additional high-quality office floorspace in this town centre location. These substantive public benefits, and the overall planning balance, are identified in the Planning Statement prepared by Quod.

## 5. Summary and Conclusions

5.1 This Heritage Statement Addendum has been prepared by Turley Heritage on behalf of the Applicant, to assess the built heritage effects of the July 2022 s73 application for amendments to the consented proposals for the petrol filling station (PFS) parcel). Consideration has been given to the proposed amendments and the amended proposed development as a whole.

5.2 The July 2022 s73 application is for amendments to the PFS parcel only. No amendments are proposed to the consented development on the MS parcel and details of that scheme are to remain as consented. The proposed amendments are to bring the planning permission up to date to enable the delivery of a high quality office building in this important town centre location. The proposed amendments, identified in detail within the Design and Access Statement are summarised for ease of reference:

- Removal of Petrol Filling Station.
- Reconfiguration of ground floor layout to accommodate:
  - Additional improved office and retail floorspace and back of house functions;
  - Enlarging the office lobby;
  - Introducing an office lobby-café;
  - Including a dedicated office cycle entrance;
  - Introducing an office mezzanine level; and
  - Replacing the Petrol Filling Station with an electric vehicle (EV) charging station (comprising four public bays).
- Extending the building 6 metres resulting in the creation of additional office floorspace across all levels (2,207 sqm GIA) and an additional ground floor retail unit (50 sqm GIA).
- Introduction of a mezzanine level to the first floor.
- Ground floor windows added to the western elevation adjoining the consented Youth Space (also within PFS site) to the west.
- Building footprint to the east adjusted (shifted 390mm westwards to improve pavement widths by 0.4m).
- Internal reconfiguration of the Corner Building by converting the retail (F&B) floorspace on Level 2 (197 sqm GIA) to office floorspace whilst retaining retail (F&B) at levels 1, 3 and 4 including the winter garden.

- Reconfiguration of Morrisons floorplan to widen the frontage by one bay and reduce depth of unit to facilitate improved trading and back of house operations.
  - Rationalisation of plant space at ground floor enabling the omission of plant from 2nd floor.
  - Reconfiguration and optimisation of plant at roof level.
  - Introduction of a rear ground floor office yard terrace.
  - Minor extension to fifth floor office terrace.
- 5.3 This Addendum report is a Technical Appendix to the July 2022 Environmental Information Letter (EIL) and summarises the findings of an updated environmental impact assessment undertaken of the July 2022 amended proposed development. The July 2022 EIL should be read in conjunction with the 2017 ES (as amended).
- 5.4 The Heritage Statement Addendum in this report should also be read in conjunction with the following built heritage assessments contained within the 2017 ES (as amended):
- June 2017 Environmental Statement (ES) Volume 2B Heritage Assessment (including Heritage Statement) that accompanied the 2017 full planning application.
  - Supplementary Report: Impact of Proposed Development on Regent's Park (October 2017).
  - January 2020 Environmental Implications Letter (EIL) that accompanied the January 2020 S73 application.
  - July 2020 EIL and Heritage Statement that accompanied the July 2020 S73 application.
- 5.5 The built heritage impacts of the July 2022 amended proposed development has been assessed in their entirety in this Heritage Statement Addendum, in respect of the conclusions of the built heritage assessments within the 2017 ES (as amended).
- 5.6 At **Section 3**, it is confirmed that there have been no changes to the built heritage baseline defined in the built heritage assessments within the 2017 ES (as amended) .
- 5.7 The impact assessment in **Section 4** of this Addendum, confirms that in overall terms, consistent with the assessment of the impacts of the December 2020 consented scheme, the July 2022 amended proposed development sustains, and, to a degree, enhances the particular significance of a wide range of the heritage assets identified within the study area, including the contributions made by setting to that significance. In those terms, the July 2022 amended proposed development is consistent with the relevant statutory duties of the 1990 Act and the requirements of the NPPF.
- 5.8 The July 2022 amended proposed development would not amplify or otherwise alter the previously established levels of heritage harm from development of the MS parcel,

which remains less than substantial for the purposes of the NPPF and 'calibrated' as comparatively modest in all instances:

- The Roundhouse (Grade II\* listed building).
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- Primrose Hill Conservation Area.
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- Regent's Park (Grade I Park and Garden of Special Historic Interest).

5.9 The Planning Statement provides the clear and convincing justification for that heritage harm (paragraph 200 of the NPPF).

5.10 The identified less than substantial harm must be weighed in the balance against the public benefits, which include heritage benefits, as required by paragraph 202 of the NPPF and must be accorded great weight and importance (paragraph 199 of the NPPF).

5.11 In this instance, the overarching public benefits are directly linked to the redevelopment of this important but underutilised site and the creation of a high-quality new neighbourhood and delivery of additional high-quality office floorspace in this town centre location. These substantive public benefits, and the overall planning balance, are identified in the Planning Statement prepared by Quod.

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