

**Statement of Common Ground
between the London Borough of
Camden and Historic England
concerning the Camden Local
Plan Proposed Submission Draft**

3rd December 2025

1. Introduction

- 1.1 This document is a Statement of Common Ground between the London Borough of Camden and Historic England, and concerns planning policies included in the Camden Local Plan Proposed Submission Draft at the Regulation 19 stage.
- 1.2 It has been prepared to demonstrate that Camden's Local Plan Proposed Submission Draft is 'based on effective joint working on cross boundary strategic matters' throughout the plan preparation period in accordance with Paragraph 36 of the National Planning Framework (NPPF) and will inform further engagement to ensure effective implementation of Local Plan policies.
- 1.3 It focusses on the matters raised by Historic England in their response to consultation on the Camden Local Plan Proposed Submission Draft. It highlights matters where agreement has been reached between the Council and Historic England, and areas where agreement has not yet been reached.
- 1.4 In the spirit of collaboration, the document has been prepared as a 'live' document, which can be updated as matters progress and agreement is reached on outstanding issues. It therefore includes details on mechanisms for monitoring, reviewing and updating the Statement of Common Ground.
- 1.5 The London Borough of Camden is reviewing its Local Plan to ensure that Camden continues to have robust, effective and up-to-date planning policies that respond to changing circumstances and the borough's unique characteristics. The Council published the Camden Local Plan Proposed Submission Draft for comment in May - June 2025. The draft Plan sets out the Council's vision for future development in Camden over the next 15 years and includes the planning policies and site allocations to help achieve this.
- 1.6 Historic England provided a response to the Camden Local Plan Proposed Submission Draft on 25 June 2025.

2. Strategic Geography

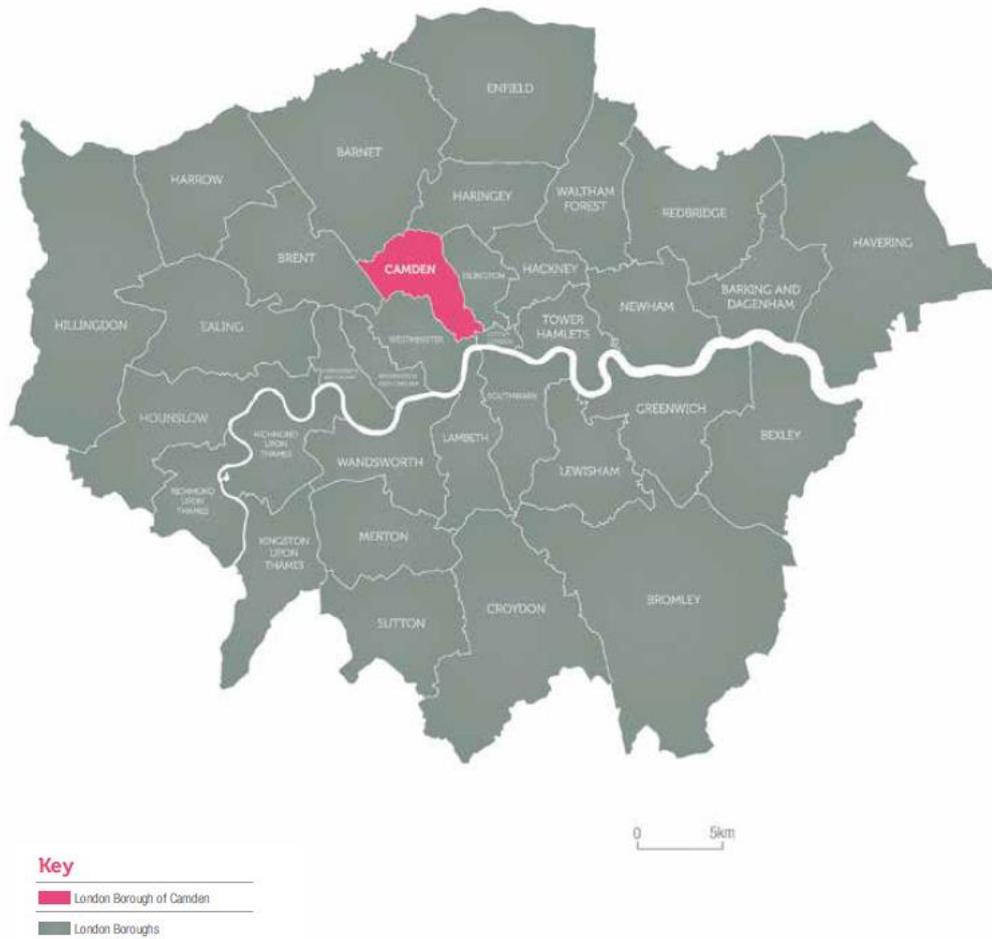
- 2.1 The parties to this SoCG are the London Borough of Camden and Historic England.

London Borough of Camden

- 2.2 Camden is a diverse inner London Borough with a population of approximately 215,000. Camden has a relatively young population, typical of a metropolitan city with a university presence, with a large proportion of students and younger adults and relatively few children and older people, compared to the national average. The southern portion forms part of the Central Activities Zone (CAZ) and includes Bloomsbury and Holborn, which neighbour the West End and City of London. Further north the character changes with many residential areas and neighbourhoods, including Camden

Town, Hampstead, Highgate, Swiss Cottage, West Hampstead and Kentish Town, each with their own distinctive identity and characteristics. The character of the borough is also shaped by its topography and by significant parks and open spaces including Hampstead Heath and Primrose Hill.

- 2.3 London Borough of Camden is bordered by six other London boroughs: City of London, Westminster City Council, London Borough Brent, London Borough Barnet, London Borough Haringey and London Borough Islington.



Historic England

- 2.5 Historic England is the Government’s statutory adviser on the historic environment, championing historic places and helping people to understand, value and care for them.

3. Key Strategic Matters

- 3.1 Many of the strategic matters and key issues to be addressed through compliance with the duty to co-operate are, in London, a matter for the London Plan or addressed through the preparation of the London Plan. The London Plan is part of the development plan for all planning authorities in

London and Local Plans prepared by London boroughs are required to be in general conformity with it.

- 3.2 In London, planning and co-operation on strategic matters are generally covered by the London Plan, with more locally specific matters covered in local plans. Historic England are a key stakeholder on the London Plan and Camden and other boroughs also engage on the preparation of the Plan. The main strategic matter to be addressed through the Duty to Co-operate for the London Borough Camden and Historic England is tall buildings and their impact on heritage assets.
- 3.3 The Council has engaged with Historic England in an appropriate, proportionate and effective manner throughout the preparation of the Local Plan, providing an opportunity for strategic matters to be discussed, and concerns in relation to the Plan to be addressed (see Appendix 1). Historic England are satisfied that the Duty to Co-operate has been met.
- 3.4 Given this, it is appropriate for this SoCG to focus on areas of agreement and disagreement between the London Borough of Camden and Historic England, in respect of the matters raised by Historic England in their response to the consultation on the Camden Local Plan Proposed Submission Draft.

4. Matters where the parties agree or disagree

- 4.1 The table below sets out the matters raised by Historic England in their representation on the Camden Local Plan Proposed Submission Draft (Regulation 19), and the status of those representations.
- 4.2 The table seeks to provide clarification and clarity to the extent to which matters raised by Historic England are resolved or remain unresolved. The table therefore represents the current agreed position in respect of the agreements and differences between London Borough of Camden and Historic England.

Relevant section of the Camden Local Plan Proposed Submission Draft	Historic England comment on the Camden Local Plan Proposed Submission Draft	Camden Response	Common Ground Agreed?
Whole Plan	As with our response to the previous (Regulation 18) consultation, we note and very much welcome the emphasis on high-quality design in new development, together with appropriate consideration of existing context that runs through the consultation draft. We also note and welcome the various amendments that have been made to individual policies and site allocations as a result of comments and discussions that have taken place since the previous consultation. These include policies D2 and D5 and sensitive site allocations such as the Wendling Estate and St Pancras Hospital. As a result, our comments on the current draft are limited in nature and relate only to three draft site allocations. They are intended to add clarity to the site allocation policies and enable greater certainty for future decision-makers.	Support welcomed	Agreed
Allocation S18 – 135-149 Shaftesbury (the former Saville Theatre).	As with our previous consultation response, we support the identification of the listed building as a site allocation given the opportunity it provides to establish in the plan a clear framework for the conservation of its significance. We note the amendments introduced to the development and design principles in relation to the site allocation at clauses 1 and 6. However, we consider that the revised clause 6 in particular remains ambiguous and would potentially be problematic	The current wording is considered appropriate. These matters are covered in Policy D1 Achieving Design Excellence and Policy D5 Historic Environment. Development proposals will be assessed against	Not agreed. HE continues to consider the wording in the Regulation 19 consultation draft to be ambiguous to the extent that appropriate consideration of impacts on heritage significance by decision makers could not be achieved and that

	<p>for a future decision-maker. As currently set out, we consider that the reference to the height and massing of any proposed upwards extension implies that the effects of such an intervention would only be of relevance to the surrounding townscape and conservation areas. However, we consider that an upwards extension would clearly have the potential to harm the significance of the listed building, depending on its form and size. In order to be clear that this should be a consideration in any future decision (and notwithstanding the position with regard to the current application for the building), we consider clause 6 should be amended to:</p> <p>'ensure that where an upwards extension is proposed, this is of the highest architectural quality to complement and enhance <u>of a height, massing and architectural quality appropriate to the form and significance</u> of the Grade II host building, is of a height and massing that is appropriate to and responds to the site's surrounding townscape and neighbouring conservation areas'.</p>	<p>these and all other relevant plan policies.</p>	<p>further clarification is necessary.</p>
<p>Allocations C10 (Juniper Crescent Estate) and C11 (Network Rail land at Juniper Crescent).</p>	<p>We strongly welcome the strengthening of the wording within both site allocations in relation to managing any effects on the significance of the Grade II* Roundhouse. We note the text at the end of the development and design principle sections of each allocation to the Building Heights Study and its conclusion that development should be within the range of 9m-45m across the site. This is a reasonably broad</p>	<p>The text reflects the findings of the Camden Building Heights Study. Applications for tall buildings will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies, which would</p>	<p>Not agreed. HE continues to consider that the range of heights proposed, the size of the sites concerned and the potential for intervisibility with the setting of the Grade II* listed building there should be some</p>

range (although we would also note that 9m is not within the definition of a tall building in the draft local plan or the London Plan which is potentially confusing) and given some of the views testing we have seen the potential for effects on significance are clear. As a result we consider that further clarity as to how heights will be distributed across each site is necessary. The final sentence of these sections should be amended to 'The acceptability of particular tall building proposals, ~~and their location within the site,~~ will need to take appropriate account of and respect the significance of the Roundhouse and should be located accordingly. They will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.

include the points in the allocation which refer to the importance of the Roundhouse and Policy D5 (Historic environment) as well as other relevant policies. Therefore additional text is not considered necessary.

further guidance as to the location of taller elements of development within both site allocation policies.

5.1 Governance arrangements

- 5.1 This Statement has been prepared as a 'living' document, which will be reviewed and updated whenever agreement is reached on any outstanding matters; or at key stages in the plan-making process, as the Plan progresses through examination.

Signatures

Signed on behalf of London Borough of Camden

R. Burden

Development Plans Manager

London Borough Camden

3 December 2025

Signed on behalf of Historic England

A black rectangular box redacting the signature of the Historic England representative.

Historic Environment Planning Adviser

London & South East Region

Historic England

3 December 2025

Appendix 1 – Correspondence with Historic England

Planning Policy
London Borough of Camden
5 Pancras Square
London N1C 4AG

By email: planningpolicy@camden.gov.uk

8 January 2019

Dear Sir/Madam,

Consultation on the London Borough of Camden Site Allocations Sustainability Appraisal Scoping Report

Thank you for consulting Historic England about the above Scoping Report.

In terms of the historic environment, on the whole, we consider that the Report has identified the majority of plans and programmes which are of relevance to the development of the site allocations, that it has established an appropriate Baseline against which to assess the Plan's proposals and that it has put forward a suitable set of Objectives and Indicators. Overall, therefore, we believe that it provides the basis for the development of an appropriate framework for assessing the significant effects which this plan might have upon the historic environment.

However, there are a few aspects of the Report where we consider that some amendments are necessary. These are detailed on Appendix A, attached.

Historic England strongly advises that the conservation team of your authority and your archaeological advisors are closely involved throughout the preparation of the SA of this Plan. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. Historic England has produced guidance for all involved in undertaking SEA/SA exercises which gives advice on issues relating to the historic environment. This can be found [here](#).



Historic England

Please note that this opinion is based on the information provided by you in the email and attached documentation dated 6 December 2018 and, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SA, have adverse effects on the environment.

Yours sincerely



Tim Brennan MRTPI
Historic Environment Planning Adviser



Historic England, 

HistoricEngland.org.uk

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Appendix A: Table of Historic England's comments on the Scoping Report of the Sustainability Appraisal of Camden's Site Allocations

Page	Section	Support/ Object	Comments	Suggested Change
3	1.0 Introduction		Please note that we are now known as Historic England	
7	Table 2		We consider that there are a number of additions that would further strengthen the SA in its assessment of likely effects on the historic environment	<ul style="list-style-type: none"> • European Landscape Convention • Convention for the Protection of the Architectural Heritage of Europe • European Convention on the Protection of Archaeological Heritage
9	Table 3 – Ref No 11		Historic England's advice document on tall buildings was revised and republished in 2015	<ul style="list-style-type: none"> • Historic England Advice Note 4: Tall Buildings (2015) – can be found at https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings/
10	Table 3		Inclusion of Historic England advice note on site allocations would	<ul style="list-style-type: none"> • Historic England Advice Note



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Page	Section	Support/ Object	Comments	Suggested Change
			further strengthen the document – please see web address earlier in this letter	3: Site Allocations in Local Plans
16	Table 5	Issue 1 – development pressures and the protection of Camden’s heritage	We welcome the identification of development pressure as an issue in managing the effects of new development on the historic environment. We would suggest that in order to reflect the requirements of the NPPF, there should be a reference to significance.	Amend final sentence to read: ‘...housing and employment needs do not cause harm <i>to the significance of heritage assets and where possible enhances their character and appearance</i> ’.
	Appendix 2		The baseline information for ‘Archaeological Priority Zones’ (now called ‘Archaeological Priority Areas’ (APA) for consistency across London) needs to be updated to reflect a comprehensive review conducted recently for GLAAS and Camden by Essex County Council. A copy of the draft report has been supplied to Alan Wito and is attached elsewhere to our response for convenience. The new APAs reflect current knowledge and archaeological interests, are tiered to identify different levels of sensitivity, and are linked to a development risk model https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greater-london-archaeological-priority-areas/ . It will be important to use the new extended APA system which is supported by the new London Plan and reduces the risk of unexpected	



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Page	Section	Support/ Object	Comments	Suggested Change
			discoveries outside recognised areas. The APA system and risk model can be used to undertake an initial rapid sift of potential development sites to identify those which may encounter significant archaeological issues.	



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Camden Council
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall
Judd Street London WC1H 9JE

By email: planningpolicy@camden.gov.uk

27 March 2020

Dear Sir/Madam

Draft Site Allocations Consultation

Thank you for the opportunity to comment on the above consultation. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG). In the main, we very much welcome the references within the consultation document to the role of the site allocation process in maintaining and enhancing Camden's historic environment. Careful consideration of heritage assets and the potential impact of new development on their significance and on wider local character will help ensure that adopted site allocation policies provide clarity on the specific criteria against which a development proposal will be judged, potentially removing risk and speeding up the planning application process. We recommend that Historic England's advice on site allocations (HEAN3: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>) is carefully considered as part of your work in this area.

Appropriate consideration of issues relating to individual heritage assets and impacts on local character during the site allocation process can help contribute towards the positive strategy for the historic environment required by the NPPF. We therefore welcome the headline commitment to conserving the borough's heritage set out in the consultation document, although we consider that some further minor amendments to certain draft



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allocations would further strengthen the consultation document. In particular, we note that there is little reference or consideration of potential archaeological issues in relation to the draft allocations. Our comments in relation to this are set out at Appendix 1.

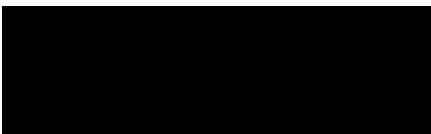
We note and welcome the identification of improving the setting of the Grade I listed Roundhouse as an objective for policy CGY4 at para 5.62, but would however suggest that this should be explicitly included in the policy text in order to enable its achievement. Similarly, we welcome clause f in Policy CGY1 that ensures LVMF views are protected with regard to relevant new development, but recommend that similar text is included in other relevant policies – not least in CSP1. Finally, we would suggest that the Grade I listed Church of St Martin is identified and considered as part of Policy IDS11 given its proximity to the site allocation.

I trust these comments are of use. We would be very pleased to discuss any part of our response in order to take the process forward. We would also stress that if it has not previously been the case, the involvement of the Borough's own conservation staff would benefit the development of the document and the wider elements of the Local Plan as they are usually best placed to identify and advise on local historic environment issues.

Finally, it should be noted that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

In the meantime, please do not hesitate to contact me should you require any further information.

Yours faithfully



Tim Brennan MRTPI
Historic Environment Planning Adviser



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Appendix 1

Site Allocation Name	In APA?	Archaeological Risk	Recommendations
Bloomsbury Campus Area	No	Low	None
Camden Goods Yard	Yes (Tier 2 APA)	Moderate Potential for canal and rail infrastructure including the former stables	Applications requiring groundworks in this area should be supported with an archaeological desk based assessment. Remains associated with the stables should be protected.
Camley Street and St Pancras Way	Tier 2 APA at the far southern end	Low for the majority of the area. High for the area covered by the APA – potential for medieval and post-medieval remains including burials	Applications requiring groundworks in this area should be supported with an archaeological desk based assessment. Any proposals which could impact burials should also be supported by a predetermination evaluation.
Holborn and Covent Garden	Tier 1 APA – North of High Holborn Tier 2 APA – South of High Holborn	Moderate for sites within Tier 2 APA. Potential for evidence of post-medieval expansion. High for sites within the Tier 1 APA – Potential for remains of the Saxon settlement of Lundenwic	Applications requiring groundworks within the tier 1 APA should be supported by an archaeological desk based assessment and most likely a predetermination evaluation. Applications requiring groundworks within the Tier 2 APA should be supported by an archaeological desk based assessment
Kentish Town	Tier 2 APA at south-eastern edge of area	Low for the majority of the area. Moderate for part of the area which falls within the APA – Historic Medieval settlement of Kentish Town	Applications requiring groundworks within the Tier 2 APA should be supported by an archaeological desk based assessment.
West Hampstead Interchange	No	Low	
88 Whitfield Street	No	Low	
Tottenham Mews Day Hospital	No	Low	
Central Cross	Tier 2 APA	Moderate-High – potential for remains of the English	Applications requiring groundworks within the Tier





		Civil War Defences	2 APA should be supported by an archaeological desk based assessment and potentially a predetermination evaluation.
330 Grays Inn Road	No	Low	
Belgrove House	No	Low	
Former Thames Link Station	No	Low	
Land bounded by Pakenham Street and Wren Street	No	Low	
Camden Road	No	Low	
Mansfield Bowling Club	No	Low	
West Kentish Town Estate	No	Low	
Royal Free	No	Low	
Land to rear of the British Library	No	Low	
Shirley House 25-27 Camden Road	No	Low	
Camden Town Station	No	Low	
Buck Street Market	No	Low	
Grand Union House 18-20 Kentish Town Road	No	Low	
202-204 Finchley Road	No	Low	
Gondar Garden Reservoir	No	Low Although the site does retain the vaulted structure of the reservoir and preservation of the structure should be encouraged	
Wendling Estate and St Stephens Close	No	Low	



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Our ref:

Planning Policy Team
London Borough of Camden
5 Pancras Square
London N1C 4AG

By email: planningpolicy@camden.gov.uk

13 January 2023

Dear Planning Policy Team

London Borough of Camden – Local Plan Review consultation

Thank you for the opportunity to give preliminary comments at the start of your local plan review. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG). They relate in particular to the NPPF requirements that local plans make sufficient provision for the conservation and enhancement of the historic environment through strategic policies (NPPF, para 20), that the identified evidence base for the historic environment is relevant and up to date (para 31) and if the Plan therefore sets out a positive strategy for its conservation and enjoyment (para 190). Historic England has produced advice on this process which can be found here:

<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/gpa1/>

Clearly, appropriate policies in the adopted Plan to ensure successful management of the historic environment in the light of development pressure will play an important role in delivering the positive strategy that the NPPF requires. However, given the cross-cutting nature of the historic environment in relation to the planning system, consideration needs to be given to a broader range of issues and policies than simply those directly relating to heritage assets and design.



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Firstly, we encourage an approach to plan-making that ensures there is a proportionate and comprehensive evidence base underpinning the Plan's management of the historic environment, including characterisation studies to help understand the current context of the local built and historic environment and where particular sensitivities may lie. This last point is now reinforced through the requirement within the 2021 London Plan for boroughs to undertake character assessments of their areas as part of plan-making.

Decisions and policies relating to a wide range of other issues can have implication for the historic environment, including

- Tall buildings
- Town centres
- Climate change
- Infrastructure
- Design
- Local views

Historic England has produced advice on these subjects as well as a range of others, which can be found at [The Planning System | Historic England](#).

The Greater London Archaeological Advisory Service ([GLAAS](#)) regularly advise in industrial archaeology, social history and public heritage benefit issues and opportunities around new development in the borough. Camden has a rich past that reflects the social, economic and political changes of the last hundred and fifty years embedded in its undesignated historic environment assets, as well as a deep past of important prehistoric, Roman and mediaeval archaeology.

There are opportunities to draw out and celebrate all of this heritage in new development schemes on and around historic sites through the emerging Plan. Doing so can be very much a 'quick win' in countering perceptions of generic development schemes, faceless design and eroded local identity. This benefit is also encouraged in the new London Plan policy HC1 as already referred to above.

We encourage the adoption of local plan policies that echo the London Plan's aspirations around heritage visitor infrastructure and presentation and agree that '[e]very opportunity to bring the story of London to people and improve the accessibility and maintenance of London's heritage should be exploited' (London Plan 7.1.3).

I trust these comments are helpful. We would encourage the Council to ensure that your own conservation staff are involved throughout the local plan process to help ensure that heritage issues are adequately addressed. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

Please do not hesitate to contact me should you require any further information.

Yours faithfully

Tim Brennan MRTPI
Historic Environment Planning Adviser





Historic England

Our ref: PL00792754

Regeneration & Planning Team
London Borough of Camden
Town Hall Extension
5 Pancras Square
London WC1H 8EQ

By email: planningpolicy@camden.gov.uk

5 May 2023

FAO Nicola Tulley

London Borough of Camden – Local Plan Sustainability Appraisal Scoping Report Consultation

Thank you for the opportunity to comment on the above consultation. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process. Given that LB Camden is at the start of a new local plan cycle, it is important that appropriate consideration of potential impacts on the historic environment are built into the process.

In terms of the historic environment, we consider that the Report has identified the relevant plans and programmes which are of relevance to the development of the local plan and that it has established an appropriate Baseline to establish an overall picture of the current state of the borough's historic environment.

In terms of the overall process relating to the Sustainability Appraisal of the emerging Local Plan, Historic England strongly advises that the conservation team of your authority and your archaeological advisors are closely involved throughout its preparation. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. Historic England has produced guidance



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for all involved in undertaking SEA/SA exercises which gives advice on issues relating to the historic environment. This can be found [here](#).

We note the key sustainability issues of relevance to the new Local Plan set out in Table 16. While we welcome the identification of development pressure as an issue that is likely to have impacts on the historic environment, we would suggest that this also needs to be linked to the related issue of design given the scale of development growth likely to be required in the borough over the forthcoming plan period. It will clearly be important that design policy within the Plan requires contextually successful development given the sensitivity in heritage terms of much of the borough.

In a related point, we would suggest that Objective 12 in Table 17 should also be expanded to ensure that the SA process enables a fully rounded assessment of the potential impacts on the historic environment. While Objective 12 and the corresponding sub-criteria are fine as far as they go, we consider that further sub-criteria would enable a more nuanced assessment of potential impacts. By strengthening this section in this way, it will also help ensure the emerging Local Plan will provide for a positive strategy for the historic environment as required by para 190 of the National Planning Policy Framework. We would therefore suggest further sub-criteria: will the Local Plan -

- Help ensure new development maintains local character and respects existing high quality townscape?
- Encourage heritage-led regeneration?
- Help provide solutions to those assets on the Heritage at Risk register?

Finally, we consider that the SA should also set out indicators to enable understanding over the Plan period as to the effects on the historic environment. These could include

- The number and condition of heritage assets on the Heritage at Risk register
- The proportion of conservation areas with up to date appraisals and/or management plans

It should be noted that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

In the meantime, please do not hesitate to contact me should you require any further information.



Historic England

Yours sincerely

Tim Brennan MRTPI

Historic Environment Planning Adviser



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Planning Policy
London Borough of Camden
Camden Town Hall
Judd Street
London WC1H 8EQ

By email: planningpoliyc@camden.gov.uk

27 March 2024

Dear Planning Policy Team

London Borough of Camden – Local Plan Regulation 18 Consultation

Thank you for the opportunity to comment on the above consultation document, and for the short extension to the consultation period to allow us to respond. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG). They focus in particular on whether the draft Plan makes sufficient provision for the conservation and enhancement of the historic environment in Camden through strategic policies (NPPF, para 20), whether the identified evidence base for the historic environment is relevant and up to date (para 31) and if the Plan therefore sets out a positive strategy for its conservation and enjoyment (para 196). Historic England has produced advice on this process which can be found here:

<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/gpa1/>

We consider there is much to welcome in the draft document in its approach to the management of change in the built environment and its potential impacts on the heritage of the borough. In particular, we note and welcome the commitment through the strategic objective on page 16 to promote high quality and contextually successful design of new

development. We also note and welcome the related section of policy DS1 (Ai). We also note and support the broad thrust of policy D5 (Heritage) and its approach to the range of designated heritage assets within the borough (although please see further detailed contents below on elements of this policy). Nevertheless, there are certain areas of the draft Plan that we consider could be further strengthened and clarified in order to achieve the positive strategy for the historic environment as required by the NPPF.

Our detailed comments are set out at Appendix 1. Overarching comments in relation to a number of areas of the draft Plan are set out in turn below.

Approach to the historic environment

As above, we consider there is much to welcome in the draft Plan and its focus on high quality design. Nevertheless, given the concentration of heritage and historic character across the borough (not least the extensive coverage of conservation area designations), we consider there could be a greater alignment with the NPPF in its approach to the historic environment – a term that is largely absent within the consultation document. Similarly, we consider that a greater emphasis on heritage significance (as defined in the NPPF) in key sections of the document would help ensure appropriate considerations of potential impacts and would enable an approach that is focused on the conservation of what is of interest in the local historic environment.

For example, we would suggest that reference to heritage significance should be made in policies DS1 (Delivering Healthy and Sustainable Development) and D1 (Achieving Design Excellence) in order to set the tone that its conservation is one of the key objectives of the draft Plan. Similarly, cross-references to the importance of considering impacts on the historic environment could be made within other policies with potential implications – for example CC2, D3 and D4 all of which could have significant effects.

Policy D5 – Heritage

As above, we welcome and support this policy, subject to certain comments. As with our comments in relation to the wider approach to the historic environment, we consider that there should be a reference to the conservation of heritage significance within the first clause of policy D1 to reflect the requirements of the NPPF, while the policy itself could be titled Historic Environment.

We note that much of clauses B and C of this policy effectively replicate paras 207 and 208 of the NPPF. We consider that this is a missed opportunity to set out a positive approach to how change affecting the local historic environment will be managed, particularly as this section of the NPPF is now well understood. The council could go a long way to achieving the NPPF's positive strategy by using this section to commit to an approach that could include the following areas

- Promoting heritage-led regeneration
- Ensuring the local historic environment is a key element of place-making
- Support proposals that provide solutions to issues that mean heritage assets are currently on the Heritage at Risk register
- Conserving key views within the borough, including those identified in conservation area appraisals and management plans
- Setting out key requirements for proposals for works that may affect heritage assets.

We would be pleased to discuss particular wording for a revised section here.

We note several references to the borough's characterisation strategy within the consultation document although this does not currently appear to be in the evidence base section of the councils' website. It would be helpful to know whether this has been updated as part of the plan review process and to be able to understand whether this contributes to the requirements of NPPF para 31.

Policy D2 – Tall Buildings.

We welcome the introduction of a specific tall buildings policy and support the differentiation in tall buildings definitions between the area of the borough within the Central Activities Zone and the area outside. We also note the areas of the borough that have been identified as being potentially appropriate for the location of tall buildings. However, again we consider that a direct reference to considering and avoiding any adverse impacts on the historic environment should be included within the policy itself – this could be done at clause vii.

The London Plan Guidance [Characterisation and Growth Strategy](#) contains helpful advice as to how to ensure tall building policies are robust enough to continue to protect the historic environment. This document is clear that after screening areas for the suitability of tall buildings, those that are taken forward should then be analysed to understand the potential harm of tall buildings on the local historic environment (para 4.4.10) and that this should

form part of the evidence base for the emerging local plan. We note the Building Heights Study that has been undertaken and consider this helpful as far as it goes. However, at this stage it is not clear how the analysis undertaken has informed the notional heights set out in a number of draft site allocations and what the effects on heritage significance and historic character might be. This is particularly the case in relation to the site allocations S4 – S7 and also those with implications for LVMF views (S12, S14, S15 and C12).

If such an exercise has been undertaken, it would be helpful to see the results to be able to best judge whether the maximum heights identified in the draft Plan are appropriate. If this work is still underway, it is critical that it is completed at an early enough stage to inform emerging site allocations and the subsequent design parameters. We would therefore question how the proposed maximum heights have been set at this stage if no analysis of such impacts currently exists, or how this approach could be considered to conform with the requirements of London Plan policy D3 to respond to existing character and context in optimising site capacity.

Historic England has also updated our advice on tall buildings, which can be found here: [Tall Buildings: Historic England Advice Note 4](#)

Site allocations

Our specific comments relating to a number of the draft site allocations are set out below. However, in general terms we would reiterate our comment relating to the identification of building heights and would wish for clarity as to how these have been determined, particularly in relation to those with potential effects on heritage assets in the vicinity. Where site allocations indicate that capacities and heights will be determined through further consultation, we would wish to see potential impacts on heritage assets play a meaningful role in the process. A proactive approach to considering heritage significance and how it can help determine design parameters, capacities and heights of development is best practice in this regard, and further advice can be found at

- [The Setting of Heritage Assets \(historicengland.org.uk\)](#)
- [The Historic Environment and Site Allocations in Local Plans \(historicengland.org.uk\)](#)

Broadly speaking, we note and welcome the detail relating to heritage assets that may be affected by the development proposed within each site allocation. We would however suggest that in the interests of consistency, where allocations are either within or adjacent to

conservation areas then reference should be made to the relevant conservation area appraisal or management plan and ensure proposals reflect these in their detail.

S8 Shorebase Access

We note the identification of the various designated heritage assets in the vicinity of this allocation. However, given the presence of the various assets together with the historic character of the conservation area, we consider the design parameters should contain further detail to enable appropriate development proposals to come forward that will respect the historic context. We consider the policy should require development proposals to demonstrate how they have responded to existing heritage significance and character in developing their design, and that particular care should be taken with respect to views that take in St Pancras Old Church and St Pancras Gardens towards the site south-east along Pancras Road.

S11 – Former Tottenham Mews Day Hospital

We recommend that the development and design principles section C) is amended to read ‘respect the building line and heights established by the adjacent housing block’.

S16 – Land to the Rear of the British Library

Development and design principles section c) should be amended: ‘Appropriate consideration should be given to the impact of development on existing buildings on the site, and any adverse impacts on the Grade I listed British Library avoided.’

S18 – Selkirk House, 166 High Holborn, 1 Museum St, 10-12 Museum St, 35-41 New Oxford St and 16-18 West Central St.

You will be aware of Historic England’s position in relation to the recent granting of planning permission by LB Camden for this site. As set out in our letter on that application, this is a highly sensitive site that contains a number of designated assets with others immediately adjacent. It is also partially covered by the Bloomsbury conservation area. As such, development on the site, particularly to heights either contained in the draft allocation or for the recently granted scheme, risk having significant effects on the historic environment. The design parameters in the allocation policy (section b) should therefore be clearer as to how development should respond to heritage significance, including taking into account views

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towards and from the conservation area. We would also reiterate our point about building heights, as it would be helpful to understand how the 54m height suggested has been arrived at.

S19 – Former Savile Theatre

This allocation is in some ways unusual in that it deals specifically with the potential refurbishment and conversion of a listed building from its original use. As such, we consider it requires particular care in order to ensure any such proposals are appropriate and provide a positive outcome for both the building and its locale. We welcome the identification of this site as an allocation and consider that this provides an opportunity to establish in plan policy the conservation of the building and its significance and as a result support the intention to retain the listed building and to restore and enhance its distinctive features. Given the principal reasons for its designation as a listed building however, we consider that the following should be added to the end of the first sentence of clause a): ‘... particularly the building’s distinctive features *in order to conserve its special interest*’.

We also consider that clause f requires an amendment to ensure that any extensions to the building are appropriate. The height and massing of any roof extension will clearly be a key factor in determining the degree of effects on the significance of the building, and not only in relation to impacts on its surroundings and neighbouring conservation areas as this clause currently indicates. As a result, we believe the following amendment would better address any potential adverse effects:

f) ‘ensure that any roof extension will be of the highest architectural quality *and of a height and massing to complement and enhance the listed building* and is appropriate to the site’s surrounding townscape and responds to the neighbouring conservation areas.’

Sites C7 – C11

Given their proximity, we support the text in the draft Plan that requires coordination in developing these allocations, particularly given the presence of nearby conservation areas and other heritage assets including the Grade II* Roundhouse. We agree that in relation to site C9 there is an opportunity to encourage new development that would have beneficial impacts in better revealing the significance of the Roundhouse in particular. Where tall buildings are proposed however, we would again inquire as to how the maximum heights have been arrived at and what are the impacts on heritage assets.



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In relation to sites C9 and C10, we consider that the site allocation policies are potentially inadequate in their approach to impacts on the Roundhouse and the conservation area. C9 indicates that development should assess any impacts on locally important views, while C10 states that proposals should be 'designed to consider the impacts' on such views. We do not consider that such an approach is robust enough to ensure that new development conserves and enhances heritage significance in this location and greater clarity is required. Again, we would be happy to discuss specific wording to address this issue, but would suggest that specific reference to views towards the Roundhouse from the north and west should be included.

Chapter 8 – Responding to Climate Change

We welcome the emphasis within the draft Plan on addressing issues stemming from a changing climate, and in particular the emphasis on the refurbishment and retrofitting of existing buildings. While we welcome policy CC5 relating to energy reduction in existing buildings, given the age of the building stock in the borough we consider that the Plan overall would be strengthened by further references appropriately considering issues relating to older buildings. This could include the importance of taking a 'whole house' approach to the retrofitting of traditional buildings to ensure heritage significance plays a part where relevant, and that interventions are minimal wherever possible and taken according to the hierarchy of reduced energy usage, energy efficiency and renewable sources. It should also be made clear that expert advice should be sought to inform proposals where necessary. Cross-referencing in the supporting text to the relevant section of the Plan dealing with design and heritage would also be helpful.

Conclusion

As indicated above, there is much to welcome in the consultation draft of the Plan. Nevertheless, we consider that there could be greater alignment with the objectives in the NPPF relating to the historic environment and some draft policies and certain site allocations. Clarifications are therefore required to ensure the Plan as a whole offers appropriate protection for the borough's historic environment.

I trust these comments are helpful, and I would be pleased to discuss further to clarify outstanding issues. We would encourage the Council to ensure that your own conservation staff are involved throughout the local plan process to help ensure that heritage issues are



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adequately addressed. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

Please do not hesitate to contact me should you require any further information.

Yours faithfully

Tim Brennan MRTPI
Historic Environment Planning Adviser



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Appendix 1: Table of Historic England’s comments on the Draft Local Plan – London Borough of Camden

Page	Section	Comments	Suggested Change
335	Policy D5	There needs to be a clear cross-reference to Chapter 8 in order to make clear that different considerations may be at play in relation to climate change-related interventions to heritage assets.	
336	Policy D5 I Archaeology	Historic England requests the amendment of this policy to bring the document into line with the National Planning Policy Framework as follows:	<p><i>1) All archaeological remains of national importance to be conserved in situ;</i></p> <p><i>2) Deposits of local archaeological significance to be properly evaluated prior to commencement of the development and where practicable conserved in situ.</i></p> <p><i>Any impacts of development on conserved deposits to be minimised through design; and</i></p> <p><i>3) If the conservation of archaeological remains in situ is impossible, full investigation, recording and an appropriate level of publication is to be undertaken by a CfA Registered Archaeological Organisation or a suitably</i></p>



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Page	Section	Comments	Suggested Change
			<p><i>qualified archaeological organisation acceptable to the Council.</i></p> <p>We also recommend the introduction of the following paragraph: <i>The Council will apply conditions to secure the implementation of written schemes of investigation prior to commencement of demolition/alterations where appropriate. The information obtained as a result of the recording is to be made public through an appropriate level of publication and to deposit copies in the Greater London Historic Environment Record. The archive is to be deposited in a publicly accessible location, for future research.</i></p> <p>We further request that the following phrase is added “Where in situ preservation is not feasible, no development shall take place until satisfactory excavation and recording of the remains has been carried out on site and subsequent analysis,</p>



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Page	Section	Comments	Suggested Change
			<p>publication and archiving undertaken by an archaeological organisation approved by the Council” <i>and conducted to standards outlined by the Chartered Institute for Archaeology as well as the GLAAS Standards and Guidance for Archaeological Investigation in London.</i></p> <p>We also suggest the text should reference the Levelling Up and Regeneration Act, 2023, which places a statutory obligation on all London Boroughs to maintain an Historic Environment Record. Historic England operates the existing Greater London Historic Environment Record and will be in touch to discuss how this long-standing arrangement might operate in the future.</p> <p>Finally, we recommend that with reference to London Plan Policy HC1, the potential of archaeology to contribute to design, place-making and social wellbeing should be assessed during the design process and enhancement opportunities identified.</p>
336	Policy D5 Clause J	We consider the text indicating that the ‘Council will seek to protect other heritage assets ... including Registered Parks and	We recommend a separate clause to the policy covering registered parks and gardens.



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Page	Section	Comments	Suggested Change
		Gardens' to not conform with the NPPF. This suggests that it is an aspiration – the NPPF is clear that any harm to a designated heritage asset should require clear and convincing justification (para 206).	
290	Policy SC3, Bv	We consider there should be an explicit reference to registered parks and gardens rather than conflation with other open spaces. This would reflect the NPPF.	An assessment of wider character, including an understanding of heritage assets where relevant.



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DTC Meeting – LB Camden and Historic England

5 September 2024 – 10 – 11am

HE – Tim Brennan

LBC – Brian O'Donnell, Rebecca Burden, Nicola Tulley, Kate Goodman

Meeting Notes

- Discussed HE response to the consultation on the draft Local Plan
- Discussed the approach taken in Policy D5 Heritage. HE advised that whilst the approach is fine, it would be good to be more positive / go further.
- HE cited Lewisham's policy as a good example.
- HE advised to call the policy 'Historic Environment' rather than 'Heritage'
- HE advised that the Plan should talk about 'heritage significance'
- HE to email Camden with some good practice re heritage and sustainability
- Camden explained the approach taken to the building heights study
- Discussed the approach taken to building heights / tall buildings in the Plan
- HE will advise which sites they would like to see the VU city information for

Post Meeting Note

- HE emailed LBC on the 25 September 2024 requesting the VU City files for the following site allocations – S4 Camley Street, S6 Parclforce, S7 St Pancras Hospital, C10 Juniper Crescent, C11 Network Rail land at Juniper Crescent, and C14 Wendling Estate
- LBC responded to provide the files on the 21 October 2024
- HE then emailed to request to see some further modelling for Juniper Crescent and the Wendling Estate.
- LBC responded with the information requested on the 8 November 2024
- HE responded with comments on the 29 November 2024 (see email below)

Hi Nicola

Thank you for sending through the further views analysis – all very helpful.

As a result, I've got a few further comments on a couple of the sites (St Pancras Hospital, the Wendling Estate and the Juniper Estate).

St Pancras Hospital – appreciate that construction is well under way on part of this site, but it obviously remains sensitive not least as it is in the conservation area and adjacent to St Pancras Gardens. As a result, we think it would be helpful to have a

bit more detail in the development/design principles section on this – in fact, the text in the adopted site allocations document is better suited to ensuring that development fits its context and avoids adverse impacts on significance (with view 11 in mind in relation to the gardens):

Fully appreciate and respond to the heritage value of existing buildings, spaces and the adjacent gardens and their contribution to the character of the conservation area and seek to retain and restore buildings making a positive contribution

Re the Wendling estate – again, a bit more detail on specific heritage assets would help avoid any potential impacts. Given the views analysis from within the Parkhill conservation area, a reference along the lines of ‘development will need to carefully consider any impacts on the setting of the Grade II* Church of St Dominic’ would address this.

Juniper Estate/Network Rail sites – the modelling from views 1 and 3 gives us some concern given the way the allocation appears very close to the Roundhouse (on the basis that view 1 shows development on the Juniper Crescent site and 3 development on the Network Rail land site). As a result, we think clause f and d respectively in each allocation needs to be strengthened rather than simply referring to impacts on local views – this may need some discussion and further thought, but something to the effect of

Development must consider and respect the significance of the Grade II* Roundhouse, including through effects on its setting and on locally important views.

I hope that makes sense – very happy to discuss. When you have a moment an update on your future timetable would also be really helpful.

Thanks

Tim

Planning Policy
London Borough of Camden
Camden Town Hall
Judd Street
London WC1H 8EQ

By email: planningpolicy@camden.gov.uk

23 January 2025

Dear Planning Policy Team

London Borough of Camden – Gypsy and Travellers Site Identification Study

Thank you for the opportunity to comment on the above consultation document. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

We consider the methodology and process followed to date to be appropriate in historic environment terms, and we therefore have no specific comments on the shortlisted sites. While we do not consider in principle that any of the shortlisted sites are unsuitable for the proposed potential use, we also note that a number of these sites are either within or adjacent to conservation areas (and that this is noted in relation to the commentary for each site).

Given this, we would expect heritage significance to play an appropriate role in the detailed considerations and development of design and layout parameters for each site at the next stage in the process to avoid and/or mitigate any potential harmful effects. Furthermore, one of the proposed sites (ID 2771) falls within an Archaeological Priority Area as denoted for its possibility to contain archaeological remains relating to the medieval and post-medieval development of Kentish Town as a settlement distinct from St Pancras. While there is no in principle objection to the use of this site for the proposed purpose, the Greater London



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Archaeological Advisory Service (GLAAS) should be consulted on any substantial groundworks in this area.

I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

Please do not hesitate to contact me should you require any further information.

Yours faithfully

Tim Brennan MRTPI
Historic Environment Planning Adviser

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Planning Policy
London Borough of Camden
Camden Town Hall
Judd Street
London WC1H 8EQ

By email: planningpolicy@camden.gov.uk

27 March 2024

Dear Planning Policy Team

London Borough of Camden – Local Plan Regulation 19 Consultation

Thank you for the opportunity to comment on the above consultation document. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG). They focus in particular on whether the draft Plan makes sufficient provision for the conservation and enhancement of the historic environment in Camden through strategic policies (NPPF, para 20), whether the identified evidence base for the historic environment is relevant and up to date (para 31) and if the Plan therefore sets out a positive strategy for its conservation and enjoyment (para 196). Historic England has produced advice on this process which can be found here: <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/gpa1/>

As with our response to the previous (Regulation 18) consultation, we note and very much welcome the emphasis on high-quality design in new development, together with appropriate consideration of existing context that runs through the consultation draft. We also note and welcome the various amendments that have been made to individual policies and site allocations as a result of comments and discussions that have taken place since the previous consultation. These include policies D2 and D5 and sensitive site allocations such as the Wendling Estate and St Pancras Hospital. As a result, our comments on the current draft are limited in nature and relate only to three draft site allocations. They are intended to add clarity to the site allocation policies and enable greater certainty for future decision-makers.

Allocation S18 – 135-149 Shaftesbury (the former Saville Theatre).

As with our previous consultation response, we support the identification of the listed building as a site allocation given the opportunity it provides to establish in the plan a clear framework for the conservation of its significance. We note the amendments introduced to the development and design principles in relation to the site allocation at clauses 1 and 6. However, we consider that the revised clause 6 in particular remains ambiguous and would potentially be problematic for a future decision-maker.

As currently set out, we consider that the reference to the height and massing of any proposed upwards extension implies that the effects of such an intervention would only be of relevance to the surrounding townscape and conservation areas. However, we consider that an upwards extension would clearly have the potential to harm the significance of the listed building, depending on its form and size. In order to be clear that this should be a consideration in any future decision (and notwithstanding the position with regard to the current application for the building), we consider clause 6 should be amended to:

~~‘ ensure that where an upwards extension is proposed, this is of the highest architectural quality to complement and enhance~~ ***of a height, massing and architectural quality appropriate to the form and significance*** of the Grade II host building, ~~is of a height and massing that is appropriate to~~ and responds to the site’s surrounding townscape and neighbouring conservation areas’.

Allocations C10 (Juniper Crescent Estate) and C11 (Network Rail land at Juniper Crescent).

We strongly welcome the strengthening of the wording within both site allocations in relation to managing any effects on the significance of the Grade II* Roundhouse. We note the text at the end of the development and design principle sections of each allocation to the Building Heights Study and its conclusion that development should be within the range of 9m-45m across the site. This is a reasonably broad range (although we would also note that 9m is not within the definition of a tall building in the draft local plan or the London Plan which is potentially confusing) and given some of the views testing we have seen the potential for effects on significance are clear. As a result we consider that further clarity as to how heights will be distributed across each site is necessary. The final sentence of these sections should be amended to

~~‘The acceptability of particular tall building proposals, and their location within the site,~~ **will need to take appropriate account of and respect the significance of the Roundhouse and should be located accordingly.** They will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.



I trust these comments are helpful, and I would be pleased to discuss further to clarify the points raised. We would encourage the Council to ensure that your own conservation staff are involved throughout the local plan process to help ensure that heritage issues are adequately addressed. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

Please do not hesitate to contact me should you require any further information.

Yours sincerely

Tim Brennan MRTPI
Historic Environment Planning Adviser

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