

Marian Place Gasholders Site Environmental Statement

Chapter E: Built Heritage

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E1.0 Introduction

E1.1 This chapter of the Environmental Statement (ES) has been prepared by Montagu Evans LLP and provides an assessment of potential direct and indirect effects of the Proposed Development on built heritage receptors.

E1.2 The salient consideration is whether the Proposed Development will preserve the setting and/or heritage value of:

- Regents Canal Conservation Area (Hackney Council); and
- Regents Canal Conservation Area (Tower Hamlets).

E1.3 This chapter sets out methodology used to assess the effect of the Proposed Development on built heritage receptors and provides a summary of the baseline conditions in the vicinity of the Proposed Development and surrounding area.

E1.4 Appendix E1: Built Heritage Baseline provides a detailed description of the built heritage receptors within the study area. This chapter then presents the results of the assessment of the effects on identified built heritage receptors.

About the Author

E1.5 Chris Miele, the Built Heritage lead has over 20 years' experience working on heritage assessments. His educational background includes a BA, MA PhD on the history of architecture and urban planning, in addition to an MA on the subject of Town and Country Planning. Chris is a Member of the Royal Town Planning Institute, Institute of Historic Buildings and Conservation, and Fellow of both of the Royal Historical Society and Society of Antiquaries.

E1.6 Chris has extensive experience of EIA and other large-scale projects including preparation and oversight of ES chapters on the redevelopment of the Whitgift Centre, West Croydon for Hammerson and Westfield; One Nine Elms; South Bank Tower; Woolwich Arsenal; Bramshill Park, Hampshire; Holocaust Memorial, Westminster. Chris' experience covers all sectors including residential, retail, commercial, leisure/events, community facilities, education and institutions such as British Museum.

E2.0 **Legislative and Policy Context**

E2.1 The following section sets out the planning policy context for the development site and for the context of the assessment process.

Planning (Listed Buildings and Conservation Areas Act) 1990

E2.2 The Proposed Development Site does not comprise any designated heritage receptors, but may form part of the setting of a number of designated heritage receptors in the wider area.

E2.3 Additionally, Gasholder Nos. 2 and 5 are considered in this assessment as non-designated heritage assets.

E2.4 With respect to this application, the applicable statutory provisions are:

Section 66(1):

“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features or special architectural or historic interest which it possesses.”

Section 72(1):

“With respect to any buildings or other land in a conservation area, of any [functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”

E2.5 In preparing our analysis we are mindful of the considerable weight attached to the preservation or enhancement of the setting of heritage assets, which was clarified by the Court of Appeal judgment in *Barnwell Manor Wind Energy vs. East Northamptonshire et al* [2014]. The Court held that *“to make an assessment of the indirect impact of development or change upon an asset it is first necessary to make a judgment about the contribution made by its setting”*. In turn, the decision ruled there is a “strong presumption” against granting planning permission for development which would cause harm to heritage assets precisely because the desirability of preserving the special interest is of *“considerable importance and weight”*.

National Planning Policy

National Planning Policy Framework (NPPF, 2019)

E2.6 Chapter 12 of the NPPF outlines the Government’s policy regarding design. It emphasises that *“good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”*.

E2.7 Paragraph 127 states that planning policies and decisions should ensure that developments:

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

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

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

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

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

E2.8 Paragraph 130 advises that:

“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.”

E2.9 Paragraph 131 promotes sustainable development and appropriate design:

“In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”

E2.10 Chapter 16 of the NPPF sets out the Government’s policies relating to the conservation and enhancement of the historic environment. In determining planning applications, Paragraph 189 specifies that:

“local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.”

E2.11 Paragraph 193 states that:

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

E2.12 Paragraphs 194 and 195 provide a definition and the approach to substantial harm. These state:

“194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

195. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a) the nature of the heritage asset prevents all reasonable uses of the site; and

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d) the harm or loss is outweighed by the benefit of bringing the site back into use.”

E2.13 Paragraph 196 has regard to less than substantial harm. It states that:

“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 including, where appropriate, securing its optimum viable use.”

E2.14 Paragraph 197 states that:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

E2.15 Paragraph 200 of the NPPF states that local planning authorities should look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

E2.16 The assessment will also take into consideration relevant planning guidance and any material considerations, including:

- National Planning Practice Guidance (online);
- Historic England, Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015);
- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017);

- Conserving and Enhancing the Historic Environment (2018);
- Hackney Road Conservation Area Appraisal (2009);
- Regent’s Canal Conservation Area Appraisal (LBH) (2007);
- Regent’s Canal Conservation Area Appraisal and Management Guidelines (LBTH) (2009); and
- Hackney Road Conservation Area Appraisal and Management Guidelines (LBTH) (2009).

Regional Planning Policy

E2.17 **Section 38(6)** of the Planning and Compulsory Purchase Act 2004 stipulates that where in making any determination under the Planning Acts, regard is to be had to the development plan, and the determination must be made in accordance with that plan unless material considerations indicate otherwise. The following documents form the statutory development plan.

Adopted London Plan (2016)

E2.18 Policy 7.4 (Local Character) states that *“in areas of poor or ill-defined character, development should built on the positive elements that can contribute to establishing an enhanced character for the future function of the area.”*

E2.19 Part B requires that development provides a high-quality design response that makes a positive contribution to the character of an area, reflecting its positive elements and being informed by the historic environment.

E2.20 Policy 7.6 (Architecture) states that *“Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.”*

Policy 7.8 (Heritage Assets and Archaeology) outlines criteria for the preservation of the significance of London’s heritage assets. Part D states that *“Development affecting heritage assets and their settings should conserve their significance by being sympathetic to their form, scale materials and architectural detail.”*

Draft New London Plan (July 2019)

E2.21 A consultation version of the New London Plan was examined in public in July 2019. The Mayor of London published an ‘Intend to Publish’ version of the London Plan in December 2020. Due to the advanced stage in the examination process, the draft London Plan can be afforded significant weight.

E2.22 Heritage policies are contained in Chapter 7, called ‘Heritage and Culture’. Part C of Policy HC1 ‘Heritage Conservation and Growth’ states that development proposals affecting heritage assets and their settings *“should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings.”*

Local Planning Policy

Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2019)

- E2.23 On the 15 January 2020, LBTH adopted its new Local Plan; Local Plan 2031: Managing Growth and Sharing Benefits. This replaces the Core Strategy (2010) and Managing Development Document (2013).
- E2.24 With regard to Marian Place Gas Works and The Oval, which includes the development site, the Inspector's Report on the (then) emerging Local Plan stated:

"138. The site is located within the City Fringe Sub area. It is identified within the Plan as being suitable for a range of land uses including housing, employment and community and social uses. The design principles place a proportionate emphasis on the existing designated and non-designated heritage assets on and adjacent to the site including the gasholders, Regent's Canal Conservation Area and the Hackney Road Conservation Area. Given the importance of these assets, this is a justified and appropriate approach. [...]"
- E2.25 The Proposed Development Site lies within a character area identified as City Fringe within the Local Plan, defined by "the City of London's financial district to the west, the London Borough of Hackney to the north, the River Thames to the south and the borough's inner-city communities to the east" (para 2.1). The character area comprises the London Plan's City Fringe Opportunity Area which falls within the borough.
- E2.26 Within this area, the development site is the subject of an allocation for housing and mixed use development. The allocation outlines a number of design principles, which have been refined through the Schedule of Minor Modifications subsequent to consultation in November 2017. With regard to heritage considerations, these require development to:

"Respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment, and specifically integrate heritage assets on site and in the surrounding areas;

Retain, re-use and enhance the existing heritage assets, including gasholders no.2 and no.5, Victorian buildings adjacent to the Regents Canal, and Georgian cottages, including the associated setted streets and railings;

Respond positively to the special character of the Regents Canal Conservation Area and its setting, scale, height, massing and fine urban grain of the surrounding built environment, and specifically integrate heritage assets on site."
- E2.27 Policy S.DH3: Heritage and the Historic Environment states:

"1. Proposals must preserve or where appropriate enhance the borough's historic designated and non-designated assets in a manner appropriate to their significance as key and distinctive elements of the borough's 24 places.

2. Proposals to alter, extend or change the use of an historic asset or proposals that would affect the setting of a heritage asset will only be permitted where:

a. they safeguard the significance of the heritage assets, including its setting, character, fabric or identity;

b. they are appropriate in terms of design, height, scale, form, detailing and materials in their local context;

c. they enhance or better reveal the significance of assets or their settings;

d. they preserve strategic and locally important views, as defined in Policy D.DH4.

3. Applications affecting the significance of a heritage asset will be required to provide sufficient information to demonstrate how the proposal would contribute to the asset's conservation. Any harm to the significance of a heritage asset must be justified having regard to the public benefits of the proposal; whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.

5. Alterations, extensions or changes of use, or development in the vicinity of listed buildings will be expected to have no adverse impact on those elements which contribute to their special architectural or historic interest, including their settings.

6. Significant weight will be given to the protection and enhancement of the borough's conservation areas, including their setting. Development within a conservation area will be expected to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance [...] Planning applications should explore opportunities from new development within conservation areas and their setting to enhance or better reveal their significance."

E2.28 Policy D.DH4 (Shaping and managing views) states:

"1. Development is required to positively contribute to views and skylines that are components of the character of the 24 places in Tower Hamlets. Intrusive elements in the foreground, middle ground and backdrop of such views will be resisted. Development will be required to demonstrate how it:

Complies with the requirements of the London View Management Framework and World Heritage Site Management Plans (Tower of London and Maritime Greenwich);

Positively contributes to the skyline of strategic importance, forming from the silhouettes of tall building clusters around Canary Wharf (as defined in the Policies Map);

Preserves or enhances the prominence of the borough-designated landmarks and the skyline of strategic importance the borough designated views;

Preserves or enhances local views identified in conservation area appraisals and management guidelines;

Preserves or enhances visual connection of the public realm with water spaces; and

Enhances townscape and other local views which are important to the identity and character of the place."

E3.0 **Assessment Methodology & Significance Criteria**

E3.1 The method is the product of legislation, policy and best practice guidance as set out in Section E2.0. Different methodologies apply to each area of assessment. We discuss each of these, in turn, below, following an overview of the general assessment framework.

Study Area

E3.2 Site observations, a manual desk-based review of OS maps, characterisation studies and relevant heritage receptors were used to determine the study area. The study area has been informed by building locations and heights, topography and townscape features, and an understanding of the scale of the Proposed Development.

E3.3 The extent of the study area has been agreed through the Scoping process.

E3.4 As such, the study area comprises all heritage receptors within a 250m radius:

- 1 listed buildings;
- 2 conservation areas;
- 3 registered parks and gardens;
- 4 scheduled ancient monuments; and
- 5 locally listed buildings (non-designated heritage receptors).

E3.5 Whilst every Environmental Statement should provide a full factual description of the Proposed Development, the emphasis of Schedule 4 is on the “main” or “significant” environmental effects to which a development is likely to give rise. The Environmental Statement should be proportionate and not be any longer than is necessary to assess properly those effects.

Site Visit

E3.6 A site survey of the baseline situation was undertaken by Montagu Evans during winter 2018-19 to understand the immediate setting of the development site, the setting of the surrounding heritage receptors, the townscape character and appearance, and key viewpoints.

Assessment Methodology

E3.7 The overarching assessment framework for all topics follows a three-step process. We discuss each of the constituent parts of the three steps below.

- 1 Baseline Assessment of Value
- 2 Assessment of Sensitivity and Magnitude
- 3 Assessment of Likely Significant Effects

E3.8 The term ‘heritage receptor’ is used within this assessment to describe a designated (e.g. World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area) or non-designated (identified by the local authority e.g. building of townscape merit etc) heritage receptor. For the purposes of this chapter, built heritage receptors do not include archaeological remains.

- E3.9 Paragraph 189 of the NPPF states:
- "In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance".*
- E3.10 'Significance' (for heritage policy) is defined in the NPPF (Annex 2) as:
- "the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting".*
- E3.11 This is reaffirmed by Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015).
- E3.12 It is commonly agreed that Grade I and II* buildings are of "exceptional" and "particularly important" interest; therefore these are generally afforded a higher heritage value. This differentiation is best summarised by the drafting of paragraph 189 of the NPPF, which states that the "*level of detail (to describe the significance of heritage assets) should be proportionate to the assets' importance*"; thus, a grading is appropriate. We have given due and proportionate regard to all heritage receptors assessed.
- E3.13 Where a proposal may have an effect on the surroundings in which the heritage receptor is experienced, a qualitative assessment is made of whether, how and to what degree setting contributes to the significance of heritage receptors. Setting is defined in the NPPF as: *the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.*
- E3.14 The assessment of setting is informed by the check-list of potential attributes outlined by the Historic England guidance document Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017) (hereafter "GPA3: Setting").
- E3.15 GPA3: Setting identifies five steps towards assessing the implications of development proposals which may affect the setting of heritage assets (it is consistent with other guidance):
- 1 Identify the assets affected
 - 2 Assessing the contribution setting makes to significance
 - 3 Assessing the effect of the Proposed Development
 - 4 Maximising enhancement and minimising harm
 - 5 Making and documenting the decision and monitoring outcomes
- E3.16 Part e is incumbent on the decision maker, through the provision of conditions.
- E3.17 When referring to 'significance' in heritage terms, the term 'value' has been adopted in order to avoid confusion with the term "significance" as used in conventional EIA sense. Value is assessed against the criteria contained in **Table E3.1**.

Table E3.1 Heritage Receptor Value

Heritage Receptor Value		
Value	Criteria	Examples
Exceptional	Building/site/area of international significance.	Including World Heritage Sites, Grade I and II* statutorily listed buildings, Scheduled Monuments with upstanding remains, and Grade I and II* Registered Historic Parks and Gardens.
High	Building/site/area of national significance.	Including Grade I and II* statutorily listed buildings, Scheduled Monuments with upstanding remains, and Grade I and II* Registered Historic Parks and Gardens.
Medium	Building/site/area of national significance.	Including Grade II statutorily listed buildings, Conservation Areas, Scheduled Monuments without upstanding remains, and Grade II Registered Historic Parks and Gardens.
Low	Buildings/sites/areas of national and/or regional significance, or local assets of particular significance.	Including Grade II statutorily listed buildings, Conservation Areas, Scheduled Monuments without upstanding remains, Grade II Registered Historic Parks and Gardens, and buildings of local interest.
Very Low	Buildings/sites/areas with some evidence of significance but in an incoherent or eroded form of local interest and generally with no statutory protection.	Often buildings of local interest and dispersed elements of townscape merit. Assets may be so badly damaged that too little remains to justify inclusion within a higher grade.

Assessment of Sensitivity and Magnitude

- E3.18 Following the identification of baseline conditions, the effect of the Proposed Development on each of the identified receptors is then considered and a judgement formed as to the duration, extent and magnitude of effect.
- E3.19 Scoping and the baseline assessment may conclude that some effects on receptors are unlikely to be significant and therefore do not need to be considered further. Where applicable, these receptors are identified within the relevant assessment sections of this chapter.
- E3.20 In order to identify the sensitivity of a receptor to the Proposed Development the baseline value must be calibrated by the susceptibility to change. Susceptibility is the ability of the receptor to accommodate proposals without undue consequences for the maintenance of the baseline situation and/or the achievement of planning policies and strategies. For heritage receptors, susceptibility also considers the setting of the receptor in conjunction with its value and the particular nature of the proposals.
- E3.21 This is an assessment bespoke to the project that considers the specific nature of the proposals in relation to the value of the receptor. It is a qualitative judgement recorded in a verbal scale (e.g. high, medium or low), although supported by a clear narrative linked to evidence from the baseline study.

Table E3.2 Susceptibility of receptor to change criteria

Susceptibility to Change Criteria	
Low	The receptor has a high ability to accommodate the specific proposed change, and/or The receptor’s existing setting may make a negative contribution to the heritage value of the asset, and/or Distance, topography and/or intervening may Building any visual relationship with the proposed change.
Medium	The receptor has a medium ability to accommodate the specific proposed change, and/or The receptors’ existing setting may make a neutral contribution to the significance of the asset, and/or Distance, topography and/or intervening development may Building or allow a visual relationship with the proposed change.
High	The receptor has a low ability to accommodate the specific proposed change, and/or The receptor’s existing setting makes a positive contribution to the heritage value of the asset, and/or Distance, topography and/or intervening development may allow a visual relationship with the proposed change.

E3.22 **Table E3.3** provides an indicative matrix to identify sensitivity, based on combining receptor value and susceptibility to change.

Table E3.3 Nature of receptor likely to be affected (sensitivity)

Receptor Value	Susceptibility of Receptor to Change		
	Low	Medium	High
Very Low	Low	Low	Low/Moderate
Low	Low	Low/Moderate	Moderate
Medium	Low/Moderate	Moderate	Moderate/High
High	Moderate	Moderate/High	High
Exceptional	Moderate/High	High	High

E3.23 A professional judgement is made of the magnitude of likely effect using criteria at **Table E3.4**. Magnitude of effect is determined by the size or scale, geographical extent or duration and reversibility of the effect. Magnitude considers whether the Proposed Development:

- Conforms with the pattern, scale, mass, grain and historic features of the receptor;
- Creates a loss or restoration of key features of the receptor;
- Contributes to the identified receptor character; and
- Accords with national, regional and local planning policy and guidelines.

Table E3.4 Likely Significant Effect

Nature of the effect likely to occur to receptor (Magnitude)	
High	Considerable change to the value of the receptor. The proposals are a new component, ranging from a notable change in receptor characteristics over an extensive area to intensive change over a more limited area. The proposals would be very noticeable.

Nature of the effect likely to occur to receptor (Magnitude)	
	Loss of or major alteration to key elements/features/characteristics of the baseline. The duration of this effect may be permanent and non-reversible.
Medium	A clearly discernible change to the value of the receptor. The proposals are dissimilar to a main component of the receptor but similar to other components. The proposals would be readily noticeable. Partial loss of or alteration to one or more key elements/features/characteristics of the baseline. The duration of this effect may be semi-permanent and partially reversible.
Low	Slight change to the value of the receptor. The proposals are similar to a main component of the receptor but similar to other components. The proposals would not be readily noticeable. Minor loss of or alteration to one or more key elements/features/characteristics of the baseline. The duration of this effect may be temporary and reversible.
Negligible	Barely discernible change to the value of the receptor. Very minor loss of or alteration to one or more key elements/features/characteristics of the baseline.
Neutral	No change to the value of the receptor.
Nil	No effect.

- E3.24 Combining respective sensitivity and magnitude matrices provides an indication of the likely significant effects. Professional judgement is, however, also required to determine significant likely effects. Qualitative assessment text is used to describe and elucidate this judgement to the reader. This is necessary because heritage assessment is not a strict quantitative process and some of these considerations will depend on expert judgements. Accordingly, there is an emphasis on narrative text throughout the report to describe the receptors and the judgements in regard to the significance of the identified effects.
- E3.25 Justification for the nature of effects (beneficial, adverse or neutral/negligible) is discussed within the qualitative assessment text.
- E3.26 Within the judgement of likely significant effects, there is a distinction between levels of significance and direction of effect, expressed as a 'word-scale'.
- E3.27 Ratings of significance are independent of 'acceptability' of the scheme as a whole, which is a judgement above and beyond that of significance. Acceptability is about the overall balance of benefits and harm from the proposals as viewed or weighted by national policy and development plan policies.
- E3.28 It is generally considered that moderate to major effects are considered 'significant' in the context of the EIA Regulations.
- E3.29 The report also considers the direct, indirect and secondary, cumulative, short-, medium- and long-term, permanent and temporary effects of the Proposed Development.
- E3.30 Broadly, short to medium-term effects are considered to be those associated with the demolition and construction phase and long-term effects are those associated with the completed and occupied Proposed Development.
- E3.31 'Local', 'district' or 'national' scale is relative to the spatial scale of the effects.

- E3.32 Direct effects may cause a physical change (e.g. alteration, extension or demolition) to the receptor as a consequence of construction or operation.
- E3.33 Indirect effects arise from the effect of activities that do not explicitly form part of the Proposed Development. They may occur as a consequence of construction or operation of the Proposed Development, but may have an effect some distance from the Proposed Development. Assessment of impacts on heritage setting refers to perceptible visual and aural (noise) effects that can be appreciated at a given time.
- E3.34 Secondary impacts are a consequence of construction or operation of the development, and can result in physical loss or changes to a receptor beyond the Proposed Development footprint. For example, construction of related infrastructure such as roads or powerlines that are required to support the proposed development. Facilitated impacts should also be considered which may be further actions (including by third parties) which are made possible or facilitated by the Proposed Development.

Consultation

- E3.35 The Applicant has engaged in pre-application consultation with statutory and non-statutory stakeholders. The consultation responses relevant to heritage are set out below.
- E3.36 An ES Scoping Opinion was provided by LBTH on 11 July 2019. In framing, and forming our assessment, we have had regard to this document.
- E3.37 The proposals have been through extensive pre-application consultation with officers from LBTH and Historic England. These authorities are supportive of the principle of the regeneration of this Site, and the retention of the gasholder frames.

Assumptions and Limitations

- E3.38 As stated in Chapter C, it is anticipated that the construction phase will take place over a period of 6 years (including de-sludging and removal of below ground metalwork for all four gasholders). This assumption is appropriately conservative to allow for a robust assessment of impacts.
- E3.39 A Construction Environmental Management Plan (CEMP) is envisaged to mitigate potential adverse environmental effects during the construction phase.

E4.0 Baseline Conditions

Existing Baseline

E4.1 **Table E4.1** provides a summary of the built heritage baseline conditions. These comprise:

- 12 listed buildings;
- 5 Conservation Areas; and
- 7 non-designated heritage receptors (including gasholder nos. 2 and 5, which were identified by LBTH as non-designated heritage receptors in the scoping opinion).

E4.2 The study area was established on the basis of an understanding of the scale of the Proposed Development, and hence its area of visual effect as a component of the setting of built heritage receptors. The development site does not form part of the setting of any World Heritage Sites or Scheduled Monuments, which are correspondingly not included within this Chapter.

E4.3 The heritage value of each receptor is described in detail in Appendix E.1: Built Heritage Baseline. Their location is also shown on the Heritage Receptor Plan at Appendix E.2. The development site does not make any contribution to the setting, and therefore heritage value, of some of the identified receptors; the 'Full Assessment Required' column defines those not needing Full Assessment on this basis. The receptors are listed in **Table E4.1**.

Table E4.1: Built Heritage Baseline

Reference in Appendix E.1	Receptor Name	Grade (if applicable)	Heritage Value	Distance from Site (Approx. at nearest extent)	Full Assessment Required
1	Keeling House	II*	High	205m	Yes
2	444 Hackney Road	II	Medium	105m	Yes
3	446-450 Hackney Road	II	Medium	105m	Yes
4	Railed Wall and Gate	II	Medium	105m	Yes
5	456 Hackney Road	II	Medium	105m	Yes
6	2 Pritchards Road	II	Medium	33m	Yes
7	375-385 Hackney Road	II	Medium	210m	Yes
8	367-373 Hackney Road	II	Medium	250m	Yes
9	Post at narrowing of road	II	Medium	170m	Yes
10	2 posts at end of Roadway	II	Medium	128m	Yes
11	F Cooke's Eel, Pie and Mash Shop	II	Medium	215m	No
12	12-20 Mare Street	II	Medium	220m	No
13	505, The Hare, Cambridge Heath Road (LBTH)	N/A	Low	140m	Yes
14	11-112, Perseverance,	N/A	Low	137m	Yes

Reference in Appendix E.1	Receptor Name	Grade (if applicable)	Heritage Value	Distance from Site (Approx. at nearest extent)	Full Assessment Required
	Pritchards Road (LBTH)				
15	35-38 Andrews Road (LBH)	N/A	Low	45m	Yes
16	1 Ada Street Workshops, E8 (LBH)	N/A	Low	158m	Yes
17	5-11 Victoria Buildings, 11 Mare Street (LBH)	N/A	Low	150m	Yes
18	Gasholder no. 2	N/A	Low	N/A	Yes
19	Gasholder no. 5	N/A	Low	N/A	Yes
A	Regent's Canal CA (LBH)	N/A	Medium	10m	Yes
B	Regent's Canal CA (LBTH)	N/A	Medium	N/A	Yes
C	Hackney Road CA (LBH)	N/A	Medium	270m	Yes
D	Hackney Road CA (LBTH)	N/A	Medium	20m	Yes
E	Broadway Market CA (LBH)	N/A	Medium	190m	Yes

E4.4 Professional judgment has been used to select those built heritage receptors that are likely to experience change to their setting, and by extension, their heritage value.

Future Baseline

E4.5 The EIA Regulations (2017) require that the likely evolution of the baseline is considered in the event that the Proposed Development were not to come forward. In other words, the likely effect on heritage receptors if the cumulative developments and any relevant policy designations were to come forward without the Proposed Development.

E4.6 The development site sits within an area which is the subject of an allocation for *“comprehensive mixed-use development required to provide a strategic housing development, a local park and a district heating facility.”*

E4.7 The development site, therefore, would be likely to be redeveloped regardless of the present proposals. There is no requirement to retain the gasholders, which may or may not remain.

E5.0 Potential Effects

- E5.1 This section considers the potential impacts of the Proposed Development both during the construction stage and when the Proposed Development would be completed. A full description of the Proposed Development is included in the supporting Planning Statement by Lichfields, Design and Access Statement by RSHP and Chapter C (Site and Scheme Description) of the ES.
- E5.2 Where possible, primary measures, developed through the iterative design process, have been used to minimise potential effects from the outset and as part of the design.
- E5.3 Possible effects were identified early on by the team and design responses have been introduced where possible, through extensive consultation.
- E5.4 The potential effects include a change in the underlying character of the land at the development site from a former industrial site to mixed-use residential, and potential visual impacts which are reciprocal to and from the development site.

During Construction

- E5.5 The construction effects of the Proposed Development relate to the construction period, anticipated to span six years as stated in Chapter C of this ES and the construction Phasing Plans submitted as part of this Application (DV13). The effects are likely to arise from the construction compound, large items of machinery, hoardings, the structures under construction and various associated operations.
- E5.6 During construction it is expected that the principal contractor will be required to work in accordance with the Construction Environmental Management Plan (CEMP), giving construction plant schedules, working hours, proposals to minimise noise emissions and a programme of sample monitoring. This will be formulated in liaison with the Council.
- E5.7 It is anticipated that the two gasholders to be retained (no.2 and no. 5) will be temporarily dismantled and refurbished off-site. This is necessary for their long term conservation, and will be for a limited duration only.
- E5.8 The construction effects of the Proposed Development relate to the construction period, with all works anticipated to span six years. The construction effects are likely to arise from large items of machinery, hoardings, cranes, the structures under construction and various operations. These can cause temporary effects on visual amenity, noise and vibration, and traffic. These are considered at Chapters K (Noise and Vibration), D (Townscape and Visual Impact Assessment) and H (Transport) of the ES.
- E5.9 In this assessment, construction effects, being temporary, are generally treated as less significant. This approach is consistent with established best practice. Heritage values, being enduring, are accepted to be capable of sustaining temporary intrusions without loss of intrinsic value.
- E5.10 As the construction is local to the development site and short term, it is considered that the construction effects will be **Minor Adverse** (not significant) for the following receptors, owing to the limited duration:
- Regents Canal CA (LBTH);
 - Regent's Canal CA (LBH);
 - Gasholder No. 2; and

- Gasholder No. 5.

- E5.11 Owing to the position of the development site, existing interposing development and vegetation, the construction works will not affect the heritage value or appreciation of receptors in the wider setting of the development site.
- E5.12 Whilst the ongoing development would be perceptible, this would be seen in the context of existing ongoing development in the wider vicinity, which forms a part of their setting and indicates the town centre location. The construction phase will not materially alter the appreciation of the intrinsic value of heritage receptors, or indeed that value itself.
- E5.13 Therefore, the significance of effect for other heritage receptors within the study area would be **Negligible to Nil (not significant)**.

During Operation

Principle of Development

- E5.14 The overarching aim of the proposals is to optimise the use of a Site which is presently vacant, unattractive, and separated from the public realm by hoardings. Also important was the desirability of retaining the two historic gasholders (nos. 2 and 5) which are considered to be non-designated heritage assets and lie within and make a positive contribution to the Regent's Canal Conservation Area.
- E5.15 As discussed at **Section 4.0 of Appendix E1**, these gasholders each possess a degree of historic and architectural interest which is worthy of consideration in the planning process, and as such are considered as non-designated heritage receptors.
- E5.16 The four gasholders at the development site no longer serve a purpose. They were previously in use to store gas for consumption during peak times by customers of the gas company. They were decommissioned in 2012 and purged of gas, and there is no reasonable prospect of re-use as part of their original function.
- E5.17 The Pressure Reduction System (PRS) remains operational, and is the only part of the functional gas infrastructure which will be retained as part of the proposals.
- E5.18 Gasholders No. 1 and No.3 were built in 1925 and 1937 respectively, and do not possess any particular heritage value. These are not within the Conservation Area, and do not make any contribution to its setting. These will be demolished to facilitate the redevelopment of the development site, consistent with the Marian Place Gasworks and The Oval Site Allocation. This will facilitate the redevelopment of the development site, and the creation of new open space around and between the new buildings.
- E5.19 Below, we consider the effect of the proposals on the heritage receptors identified at **Section 4.0** beginning with the 5 CAS.

Conservation Areas

Regent's Canal Conservation Area (LBTH)

- E5.20 Principally, it is the post-industrial appearance, adjacency to the Regent's Canal (which is also bound up in the industrial history of the area), and defensive enclosed character that gives the development site its industrial and utilitarian character. In this current condition, this part of the CA is inaccessible, the main external manifestations of the historic use being the two historic gasholders.

E5.21 The project team have worked closely to respond to those salient characteristics. The Proposed Development takes the form of a six cylindrical buildings, two of which will lie within the existing gasholders, three as new built forms, and one that will house the relocated Pressure Reduction Station. The proposed development will be publicly accessible for the first time in 180 years with areas designed to encourage people to visit and engage with site and its history.

Retention of Gasholder Nos. 2 and 5

E5.22 An important aspect of the Proposed Development will be the retention of the frames of Gasholder Nos. 2 and 5. The draft methodology for retaining the gasholders is considered further below in the assessment of the proposals on these assets.

E5.23 The gasholders form the main standing elements that reflect the industrial gas legacy associated with the development site. Retaining the gasholders will maintain a cultural richness to the proposed development that helps to amplify the historic sense of place.

E5.24 As part of the retention, a roller carriage and guide rails of Gasholder Nos. 2 and 5 will be retained. This will ensure that the ability to appreciate how the gasholders functioned will remain tangible and easily understood, particularly when viewed from the public space on the canal side.

E5.25 This was the approach favoured through the consultation process by statutory consultees, Historic England, and members of the public.

Design of Buildings A and E within Gasholder Nos. 2 and 5

E5.26 Within the gasholders will be Buildings containing predominantly residential accommodation, with a range of active retail and commercial uses in the lower floors. The quality of the accommodation and layout of the new buildings within the gasholders will have a beneficial effect on the appearance of the CA.

E5.27 In the case of Building E, which would lie within Gasholder No. 2, the building has an expressed structure mimicking the two tiers of the gasholder frame. The bays form repetitions of recessed balconies and screened elevations that include colourful vertical bands. This simple form allows each bay of the new building to correspond with the rhythm of the historic frame creating uninterrupted views out. In comparison to other gasholder retention schemes (such as King's Cross) this approach is successful because it improves the outlook from the units and the way that people will interact and understand the historic frames from the ground.

E5.28 The elevations of the new Building will be well-proportioned and complement the historic gasholder frame, allowing the refurbished appearance (which will be an improvement in comparison to the existing condition) to be easily appreciated. This, in turn, will improve the appearance of the CA.

E5.29 Building A will be split into two crescent-shaped buildings with a break through the centre. There will only be one full height opening on the northern side. The southern side will accommodate a single storey infill to connect the two crescents. This layout will allow viewers the opportunity to read the long radius of the gasholder frame, and that depth will allow visitors to appreciate the size and scale of this historic structure.

E5.30 Similar to Building E, the elevation has been articulated to directly relate to the rhythm of each bay of the historic gasholder frame. The repetition of recessed balconies corresponds with the definite rhythm of the frame, again allow uninterrupted views out from the building. A vertical band will separate each unit, and run up the building, and in front of

each gasholder standard (the vertical upright). In doing so, the standards will be emphasised by standing out against the colourful backdrop. This arrangement will ensure that the ability to appreciate the structural form of the historic gasholder frame will be maintained.

E5.31 In the design of both Buildings A and E, the internal buildings will finish in height below the upper tier of the gasholder frame (referred to here as the “crown”). The treatment of the upper floors of those Buildings, particularly in Building A where the roof will have a serrated edge, will be neutral in terms of colour and general articulation. This arrangement will ensure that the frames will remain easily appreciated in silhouette within local townscape views.

E5.32 At ground floor level Buildings A and F will be set in from the circumference of the gasholder frame. This will create an arcade at the base of each gasholder which will provide an opportunity to move around and through the structures, allowing visitors to appreciate the gasholder frames, as well as interact with the vibrant uses at this level.

Design of Buildings B, C and D

E5.33 In plan, the new Buildings will appear like a string of beads that give structure to the outer part of the development site, which will provide a buffer to the Proposed Development beyond the development site boundary, and the crescent-shaped public space that will lie at the heart of the development site.

E5.34 These cylindrical forms recognise the industrial legacy of the former gas station, echoing the gasholder shapes and form of building E.

E5.35 The aesthetic of the expressed frames of the new Buildings reflect the structural appearance of wind ties, often found on historic gasholders. Moreover, the general articulation will be similar to Buildings A and E, giving the proposed development a coherence as a family of buildings grounded in the historical use of the development site.

E5.36 The Conservation Area has no particular consistency of materials or palette of colours. It is very diverse including, for example, the brightly coloured and celebratory panels at Containerville. A palette of colours drawn from the local area will be reflected in all three of the new Buildings, across the architecture. Additionally, metalwork will be predominant throughout, in panels, reflecting the prevailing materials found within the development site as it is found today. The combination of these two parts of the Proposed Development will help bed the Proposed Development into the existing context, while also echoing the historic uses and legacy associated with the gas infrastructure.

Scale and Mass

E5.37 Buildings B, C and D will gradually rise up from the south to the canal side as follows:

- Building A: 13 storeys (ground +12)
- Building B: 9 storeys (ground +8)
- Building C: 13 storeys (ground +12)
- Building D: 11 storeys (ground +10)
- Building E: 6 storeys (ground +5)

E5.38 This gradual scale has been designed to reflect the height of the existing gasholders in their “inflated” condition. This arrangement has two benefits.

E5.39 First, they would not be a new addition to the skyline; this was part of the character of the Site, when the gasholder were filled with gas and would rise and fall, before they were decommissioned in 2012.

E5.40 Secondly, this family of new Buildings will form the backdrop of Gasholder No. 5. The arrangement will reaffirm the development site's contribution to local townscape views, particularly from the Regent's Canal.

Landscaping

E5.41 The Proposed Development will deliver an 'over provision' of approximately 75% of public space relative to the requirement set out in the Site Allocation. This will be delivered principally through the central lawn, which will facilitate views through and across the development site, contributing to a welcoming, open character which would wholly beneficial in comparison to the existing condition of the development site.

E5.42 In tandem, the canal edge will be animated and opened to the public for the first time, creating a new space designed to encourage people to dwell and enjoy the views across the water in a manner that has not been possible before.

E5.43 The landscaping will be populated with areas of tree planting to evoke the re-colonisation of the development site. Together with the central lawn, the landscaping will dramatically improve the appearance of this part of the CA and its immediate setting.

Interpretation

E5.44 In addition to the retention of parts of the gasholder frame apparatus (e.g. the roller carriage and guide rails), interpretation boards will be located within the development site at key points (yet to be confirmed) to give the opportunity for visitors to understand the history of the development site. Paragraph 38 of GPA3 identifies that "improving public access to, or interpretation of, the assets including its setting" is an enhancement and public benefit.

Overall

E5.45 The Proposed Development will lead to a substantial enhancement to the character and appearance of the CA. We identify the following benefits that should be weighed in favour of the proposals:

- 1 Removal of intrusive gas infrastructure (such as telemetry) lying within the CA and its immediate setting (both within the development site). Removal of such negative features in a CA should be weighed in favour of the Proposed Development.
- 2 Opening the development site to public access for the first time in 180 years, including a new canal-side public space. This will improve the ability of visitors to appreciate the heritage value of the CA.
- 3 The retention and refurbishment of Gasholder Nos. 2 and 5 will secure their long-term use and conservation in a manner that is viable and consistent with their conservation. In turn, the heritage value of the CA will be enhanced through the improvement to the appearance of the gasholder frames.
- 4 The setting and heritage value of the CA will be enhanced by a high quality landscaping scheme that will demonstrably improve the way that the CA appears and functions.
- 5 The provision of an outstanding and innovative design of the new buildings that will lie within the existing gasholder frames and other new Buildings. The calibre of

architecture is of the highest standard by RSHP, and we anticipate will help raise the standard of design more generally in the area. The addition of the Proposed Development will demonstrably enhance the way that this part of the CA appears and functions.

- 6 Introduction of a new view of the frame of Gasholder No. 5 by creating a central cut through within the internal new Building. While the building itself would be an addition within the frame, that void was formerly occupied by the rise and fall of gasholder lifts. The new central view would be dramatic and add to the public experience of the gasholder and, in turn, the CA.
- 7 Provision of interpretation boards which will describe the history and heritage value of the development site, and so improve the ability for people to appreciate the heritage value of this part of the CA.

E5.46 On this basis we consider that the significance of effect relating to this receptor will be **Moderate Beneficial (significant)**.

Regent's Canal Conservation Area (LBH)

E5.47 The Proposed Development will introduce new, high quality buildings within the gasholder frames, giving them a new vibrancy in views and activating this part of the CA's setting.

E5.48 The retained gasholder frames will continue to make a positive contribution to the setting and heritage value of the Conservation Area, and will be seen in views along the canal.

E5.49 The parapet of the tallest part of the Proposals, within the frame of Gasholder no. 5, will remain below the crown and thus preserve its primacy in views along the canal. This is illustrated in views included in the TVIA (see views 3, 12, 8d and 8e). Seen in conjunction with Containerville, the Proposed Development will contribute to a vibrant, modern setting to the CA, which responds to its industrial character and heritage.

E5.50 The building within Gasholder No.2 would also be set below the crown, though due to its lower scale, this building is not visible from as wide an area.

E5.51 The Proposed Development would enhance the setting and heritage value of the Conservation Area.

E5.52 It is therefore considered that the significance of effect relating to this receptor will be **Minor Beneficial (not significant)**.

Hackney Road CA (LBTH)

E5.53 The character of the Hackney Road Conservation Area is derived primarily from its long use as an east-west arterial route through this part of London. It is understood separately from the former industrial context closer to the canal frontages, and built form has a more residential and commercial focus.

E5.54 The intrinsic character of the CA would not change as a result of the Proposed Development. It would remain legible as an historic arterial route, flanked by a range of built form reflective of its piecemeal development.

E5.55 The change at the development site would be experienced in views north toward the development site through townscape gaps. The Proposed Development would be understood separately from the CA, and their cylindrical form and complementary colouring would integrate into the existing context whilst maintaining the primacy of the gasholders.

E5.56 The overall change to the setting of the CA would be minimal, and would have no effect on its heritage value or appreciation. Whilst the change would be perceptible in some views from the receptor, the intrinsic character of the Hackney Road CA would not change.

E5.57 It is therefore considered that the significance of effect relating to this receptor will be **Negligible (not significant)**.

Hackney Road CA (LBH)

E5.58 A small area of the Hackney Road CA in the London Borough of Hackney falls within the study area, and comprises the former site of the Shoreditch Gasworks, which is now entirely divorced from the development site. There are some views from within Haggerston Park towards Gasholder No.5, which contribute to the understanding of the proposed development of the locality.

E5.59 This visual relationship, whilst peripheral to the experience of the CA, would be preserved by the Proposed Development (see view 5 of the TVIA). The new built form would ensure that the contribution made to the industrial character of the development site in views would be maintained, and the high quality form of the new buildings would be an attractive addition to the setting of the CA.

E5.60 The change to setting would be minimal, and peripheral to the experience of the conservation area as a whole.

E5.61 Therefore, it is considered that the Proposed Development would have no effect on the character or appearance of the conservation area.

E5.62 It is therefore considered that the significance of effect relating to the receptor will be **Neutral (not significant)**.

Broadway Market CA (LBH)

E5.63 The Broadway Market CA lies to the north of the development site, oriented north-south along the Market Porter's Route, used historically to transport goods between Hackney fields and City markets.

E5.64 Gasholder No. 5 appears in incidental views south from the CA, as illustrated at Viewpoint 9 of the TVIA. This is understood as part of the former industrial context in the environs of the canal to the south, and at present makes no particular contribution to the character, appearance or appreciation of the Conservation Area.

E5.65 The high quality new buildings would be an attractive addition to views south, and would integrate into the colour palette of the surrounding buildings.

E5.66 Whilst the Proposed Development would be visible from southern part of the area, its intrinsic character would not change. The Proposed Development would preserve the heritage value of the asset.

E5.67 It is therefore considered that the significance of effect relating to the receptor will be **Negligible (not significant)**.

Listed Buildings

Keeling House (grade II*)

- E5.68 The Development Site does not presently contribute to the setting and significance or appreciation of Keeling House, which is situated within an area of mixed, predominantly post-war development at the junction of Temple Street and Claredale Street.
- E5.69 The Proposed Development will be occluded by interposing development at ground level, and in views down Temple Street.
- E5.70 There are likely to be private views of the Proposed Development from the residential homes in the upper storeys of Keeling House. The Proposed Development will appear as a very high quality addition to the local area with a height and scale that reflects the “inflated” form of the existing gasholder.
- E5.71 Overall, there would be no effect on the setting and heritage value of the listed building.
- E5.72 It is therefore considered that the significance of effect relating to the receptor will be **Nil (not significant)**.

444 Hackney Road (grade II), 446-450 Hackney Road (grade II), Railed Wall and Gate (grade II), 456 Hackney Road (grade II)

- E5.73 This group of listed buildings is situated on the south side of Hackney Road, and experienced in the context of the linear route along Hackney Road.
- E5.74 The Proposed Development would not be seen in views oriented south, in which the front elevation of the buildings can be best appreciated. The nearest townscape view is View 5 of the TVIA. The TVIA states:
- "The top of Building C of the Proposed Development would be visible above the roofline of the listed and unlisted 19th century houses. It would remain below the height of the pediment of Nos. 383-385. In views from further west only the very top of Building C would be glimpsed between the pediments of the listed houses with less impact on the skyline; in more distant views west Nos. 383-385 Hackney Road, the Proposed Development would not be visible. Where clearly visible, the Proposed Development would introduce a noticeable new townscape feature seen beyond the existing skyline of Hackney Road but would not dominate the townscape composition; it would have a medium level of impact on the composition and character of the view. The Proposed Development would contrast with the character of the listed buildings in the foreground from this position in which the two are fleetingly visible in close relation. However, the view is a fleeting one and the character of Hackney Road more widely is eclectic. The circular form of Building C would echo the pre-existing visibility of the gasholder tanks prior to decommissioning and would relate to the surviving circular gasholder tanks on the Site that are visible in views from other locations in the vicinity contributing to the distinctive local character of the area. The circular form would be well-articulated, and the material palette would complement the existing townscape. The balance of benefit and harm would result in a neutral effect. "*
- E5.75 Although there is no visual relationship between these listed buildings and the development site, viewers may be aware of the Proposed Development owing to the glimpsed views to the north along Hackney Road as suggested by View 5. That awareness would not impact on the ability to appreciate the setting and heritage value of these listed

buildings. Indeed, the Proposed Development may act as a catalyst for regeneration which would, in time, improve the setting of the assets.

E5.76 It is therefore considered that the significance of effect relating to the receptors will be **Negligible (not significant)**.

2 Pritchards Road (grade II)

E5.77 2 Pritchards Road is a two storey terraced house which forms part of the range of mixed development in the Hackney Road Conservation Area. It is presently experienced within a mixed context which includes ranges of former industrial buildings interspersed with purpose-built residential Buildings.

E5.78 Townscape View 4 illustrates the proposed condition. The TVIA states:

" Buildings C and D of the Proposed Development would be visible above the varied scale of existing buildings at the corner of Pritchard's Road and Hackney Road, making an immediately noticeable change of medium impact to the composition and character of the view but one that would not dominate views from Hackney Road. The clean circular forms of the Proposed Development would create a visual juxtaposition with the foreground - as the raised gas tanks would have done historically - and an attractive and distinctive skyline would be created that would relate well to the former use of the Site. The architectural treatment of the Proposed Development would complement the industrial language of the retained gasholder frames, which are not visible in this view, and would complement the mineral colour palette of materials in the LBTH Hackney Road Conservation Area. The nature of the effect would therefore be beneficial."

E5.79 Overall, the setting of the building would be changed such that two new buildings of outstanding design quality would be seen rising above the roofline of this and adjacent properties. Given that the existing gasholders were formerly part of the historic context, rising and falling throughout the day, we consider that the setting and heritage value of the asset would be preserved.

E5.80 It is therefore considered that the significance of effect relating to this receptor will be **Negligible (not significant)**.

375-385 Hackney Road (grade II), 367-373 Hackney Road (grade II)

E5.81 These buildings are situated on the north side of the east-west route of Hackney Road, and form part of its varied context of residential development.

E5.82 The visual impact of the proposals is illustrated in townscape View 3. The TVIA states:

"The top of Building C would be visible above the roofline of the 19th century houses. It would remain below the height of the pediments of Nos. 383-385 Hackney Road. In views from further west only the very top of Building C would be glimpsed between the pediments of the listed houses with less impact on the skyline; in views to the west of Nos.3 83- 385 Hackney Road, it would not be visible. The circular form of Building C would echo the pre-existing visibility of the gasholder tanks prior to decommissioning and would relate to the surviving circular gasholder tanks on the Site that are visible in views from other locations in the vicinity contributing to the distinctive local character of the area".

- E5.83 When considering the impact on the heritage value of the listed buildings, one is mindful that View 3 is representative of the greatest impact of the proposals. The visibility is short-lived as the viewer moves to the northern side of Hackney Road, and as one travels in an easterly and westerly direction.
- E5.84 The setting of the listed buildings is defined by the relationship with Hackney Road, with the viewer's experience generally focussed on the linear route in either direction.
- E5.85 Thus, Building C would appear as a peripheral addition to the setting and experience of the listed buildings.
- E5.86 Any impact would also be considered in the context of the historic setting where gasholder were visible from this location when they rose over the course of an evening.
- E5.87 Overall, there would be change to the setting of the listed buildings. However, that change would take the form of an outstanding example of architecture marking the regeneration of an Allocated Site. In our judgement the proposed development would preserve the heritage value of these assets.
- E5.88 It is therefore considered that the significance of effect relating to the receptor will be **Negligible (not significant)**.

Post at narrowing of road (grade II), 2 posts at end of roadway (grade II)

- E5.89 The development site does not presently contribute to the heritage value or appreciation of these buildings. The Proposed Development would not change the setting or appreciation of these receptors.
- E5.90 It is therefore considered that the significance of effect relating to the receptor will be **Nil (not significant)**.

Non-designated heritage receptors

Gasholder No 2 and Gasholder No 5

- E5.91 Gasholder Nos. 2 and 5 are not locally listed, however they are considered to be non-designated heritage receptors.
- E5.92 Gasholder No. 5 is the taller and more prominent of the two to be retained. It was built to designs by George Trewby and completed in 1889.
- E5.93 Gasholder No. 2 is the earlier of the two, completed by Westwood and Wright's of Dudley in December 1866.
- E5.94 Both gasholders are presently redundant structures with no function or use. They were separated from the network and purged of gas in 2012.
- E5.95 The benefits of retaining the gasholders, including the aesthetic merits of the proposed infill buildings, are discussed under the Regent's Canal CA above. The same benefits would apply to Gasholder Nos. 2 and 5 as non-designated heritage receptors

Repair and Refurbishment

- E5.96 The gasholders will be subject to repair and refurbishment in order to ensure that they are suitable for their new use. These include repairs that are necessary first to ensure each of the gasholders' long-term survival, and aesthetic repairs which will improve its appearance:

- primary structural
- safety
- serviceability

E5.97 It should be noted that this repair and refurbishment strategy will be subject to refinement prior to any works taking place to the gasholders. This is due to the cast iron and steel construction of Gasholder Nos. 2 and 5 respectively. Indeed, the Applicant anticipates that the details for refurbishment will be secured through a planning condition.

Removal of the Bell and Tank

E5.98 The Proposed Development includes the removal of the gasholder bell (including internal apparatus) and tanks within Gasholder No. 2 and No. 5.

E5.99 The tank of Gasholder No. 2 is of brick, laid in hydraulic lime mortar with bands of several courses set in Portland cement mortar for additional strength. It is 133ft (40.6m) in diameter and 36ft (11m) deep.

E5.100 In contrast, the tank of Gasholder No. 5 is of mass concrete, 200ft (61m) in diameter and 50ft 6 inches (15.4m) deep.

E5.101 These parts of the gasholder were not considered to contribute to the interest of the structures when Historic England assessed them for listing in 2015. These parts are not generally accessible, lying in their resting state, and cannot therefore be appreciated for their engineering design. Indeed, they are currently filled with water and the crowns have been cut with holes as part of the decommissioning process.

E5.102 While these aspects have some historic interest for their association with the historic gasholder frames, and as inherent parts of the working gasholder, they do not contribute to the value that is more readily associated (and appreciated) with the above-ground frames.

E5.103 This is the reason why we consider that the tank and crowns do not contribute to the significance of the Regent's Canal CA. They have very limited external expression and in comparison, the frames make a markedly and demonstrably greater contribution.

E5.104 In previous planning applications involving the retention or salvage of parts of gasholders, the tanks have not been considered to contribute to the significance of the frames. This was borne out in the King's Cross development (LB Camden Planning Reference: 2004/2315/L), Stepney, and the former Imperial Gasworks at Fulham.

E5.105 When considering the impact of the loss of bell and tanks, one must balance the harm to the non-designated heritage receptor caused by the loss of the fabric (which is of materially lesser weight than harm to a designated asset) against the benefits of securing the long-term viable use of the gasholder frames, and the demonstrable enhancements to their setting.

Overall

E5.106 The gasholders would be given a new use which meets the requirements of the site allocation, preserves their contribution to the CA, and enables the public appreciation of their form from within the development site for the first time.

E5.107 On that basis we conclude that the heritage value of these assets would be enhanced through the refurbishment and creative reuse of the frames.

E5.108 The Proposed Development would result in a **Minor Beneficial** (not significant) effect to Gasholder no. 2 and Gasholder No. 5.

505, The Hare, Cambridge Heath Road

E5.109 The gasholders are a prominent element in the setting of the receptor, and form part of its post-industrial, mixed setting. There is no particular historic or other association between the development site and the receptor, save that of proximity.

E5.110 The retention of the gasholders would preserve their contribution to its setting, and the new development would be an attractive addition to the streetscape, which responds to and respects the existing character of the development site.

E5.111 Whilst a noticeable change in the setting of the asset, the Proposed Development would have no effect on its heritage value.

E5.112 It is therefore considered that the significance of effect relating to the receptor will be **Neutral (not significant)**.

11-12 Perseverance, Pritchards Road

E5.113 There are some incidental views of the development site in the setting of the receptor, and the Proposed Development would be a perceptible change, however, this would be understood in the context of the post-industrial context in the environs of the canal. The new built form at the development site would be a high quality, attractive addition which responds to and respects the existing character of the Proposed Development Site.

E5.114 Townscape View 10 includes the public house to the right hand side. The TVIA states:

"The massing has been designed to complement the scale of the existing gasholder frames, allowing them to remain legible within the townscape. To the right, Building D, to the south of the retained gasholders and outside the conservation area, would have a complementary circular form. The scale of the tallest building, Building A, would remain lower than the top of Gasholder No.5 allowing the lattice work beam at the top the frame to remain visible and preserving the landmark quality of the gasholder. The circular forms of the Proposed Development would create an attractive stepping skyline - as the raised gas tanks would have done historically – that would relate well to the former use of the Site".

E5.115 We consider that the setting and heritage value of the public house would be preserved.

E5.116 It is therefore considered that the significance of effect relating to the receptor will be **Negligible (not significant)**.

35-38 Andrews Road

E5.117 The gasholders form a prominent element in the setting of the receptor, and contribute to the post-industrial, mixed setting in which it is experienced.

E5.118 The Proposed Development would be a noticeable change in the setting of these receptors. The gasholders would be retained, thus preserving their contribution to the setting of these assets, and the new development would be understood as part of the changing context in the environs of the canal. The high quality of the new built form would be an attractive addition to the streetscape, which responds to and respects the existing character of the development site.

E5.119 We consider that the setting and heritage value of the asset would be preserved.

E5.120 It is therefore considered that the significance of effect relating to the receptor will be **Negligible (not significant)**.

1 Ada Street Workshops, E8

E5.121 The development site at present does not make any particular contribution to the heritage value or appreciation of the receptor, with which it does not share any historic or other association.

E5.122 There is the potential for some incidental views of the Proposed Development in the wider setting of the receptor, however, these would be understood as part of the wider setting to the south, and would not affect the intrinsic heritage value of the receptor, or the appreciation thereof.

E5.123 It is therefore considered that the significance of effect relating to the receptor will be **Neutral (not significant)**.

5-11 Victoria Buildings, 11 Mare Street

E5.124 The Proposed Development would be visible in some views towards the receptors from the east.

E5.125 The retention of the gasholders would preserve the contribution made by the frames to the mixed, post-industrial character of the receptors' setting.

E5.126 Whilst this would be a perceptible change in the wider setting of the receptors, it would not affect their intrinsic heritage value or the appreciation thereof.

E5.127 It is therefore considered that the significance of effect relating to these receptors will be **Negligible (not significant)**.

E6.0 **Mitigation and Monitoring**

E6.1 Measures proposed to prevent, reduce or where possible offset any significant adverse have been identified and developed as part of the design process and are identified within this section of the report.

E6.2 Where possible, primary measures, developed through the iterative design process, have been used to minimise potential effects from the outset and as part of the design.

During Construction

E6.3 At construction stage, mitigation measures include the implementation of a Construction Environmental Management Plan (CEMP), incorporating construction plant schedules, a method statement for the temporary dismantlement of gasholder nos. 2 and 5, working hours, proposals to minimise noise emissions and a programme of sample monitoring. This will be formulated in liaison with the Council and secured by planning condition.

During Operation

E6.4 Possible effects were identified early on by the design team and design responses have been introduced where possible and in agreement with the Council following extensive consultation. These include:

- The retention of the gasholder frames;
 - a Retention and refurbishment of Gasholder Nos. 2 and 5 with new buildings set within and set back from the circumference of the frames. This will provide the opportunity to appreciate the engineering interest of the gasholders.
- Preserving views of gasholder nos. 2 and 5 against the sky;
 - a Buildings A and E designed to be a height that falls short of the height of the retained and refurbished gasholders. This will ensure that the crown of the historic frames can be read against the sky, and so allowing viewers to appreciate the heritage value of the gasholders
 - b The mass and scale of the proposed development follows the pattern previously established by the former gasholders. Buildings B, C and D gradually rise towards the canal in order to emphasise Gasholder No. 5, which makes a positive contribution to the character and appearance of the Regent's Canal Conservation Area (LBTH), and the setting of the equivalent in the London Borough of Hackney
- The cylindrical form of the new buildings which creates more opportunities for permeability through the development site and within the conservation area;
- Attractive landscaping

E6.5 The potential effects include a change to the character of the development site, from a derelict former industrial landscape to a residential-led modern development, and potential views which are reciprocal, to and from the development site.

Historic Building Recording

E6.6 A programme of Historic Building Recording will be undertaken to record the gasholders during the redevelopment of the development site.

E6.7 Stage 1 recording, comprising a desk-based assessment of the gasholders' historic development and heritage value, has already been undertaken by National Grid Property,

and will be supplemented by a stage 2 report (detailed survey during demolition) and photographic record. It is anticipated that recording will be secured through a planning condition.

E7.0 **Residual Effects**

During Construction

- E7.1 The residual temporary construction effects for all receptors will be the same as those identified for the assessment of effects. This is because mitigation measures have been incorporated into the Proposed Development over the course of the design process.

During Operation

- E7.2 The residual effect of the Proposed Development on built heritage receptors will be the same as those set out in the assessment of effects. This is because mitigation measures have been incorporated into the proposed development over the course of the design process.

E8.0 Summary & Conclusions

E8.1 The table below summarises the likely significant effects of the Proposed Development at construction and operational stages.

E8.2 The only residual significant effect is an identified moderate beneficial effect to the Regent's Canal Conservation Area (LBTH). No residual adverse effects are identified.

Table E8.1 Summary of Effects

Receptor	Heritage Value	Susceptibility to Change	Sensitivity	Magnitude of Impact	Likely Effect
During Construction					
Keeling House	High	Low	Moderate	Nil	Nil
Post at narrowing of road	Medium	Low	Low	Nil	Nil
2 posts at end of roadway	Medium	Low	Low	Nil	Nil
444 Hackney Road	Medium	Low	Low	Negligible	Negligible
446-450 Hackney Road	Medium	Low	Low	Negligible	Negligible
Railed wall and gate	Medium	Low	Low	Negligible	Negligible
456 Hackney Road	Medium	Low	Low	Negligible	Negligible
2 Pritchards Road	Medium	Low	Low	Negligible	Negligible
375-385 Hackney Road	Medium	Low	Low	Negligible	Negligible
363-373 Hackney Road	Medium	Low	Low	Negligible	Negligible
12-20 Mare Street	Medium	Low	Low	Negligible	Negligible
F Cooke's Eel, Pie and Mash shop	Medium	Low	Low	Negligible	Negligible
Regent's Canal Conservation Area (LBH)	Medium	Medium	Moderate	Low	Minor Adverse
Regent's Canal Conservation Area (LBTH)	Medium	Medium	Moderate	Medium	Minor Adverse
Hackney Road Conservation Area (LBH)	Medium	Low	Low	Neutral	Neutral
Hackney Road Conservation Area (LBTH)	Medium	Low	Low	Negligible	Negligible
Broadway Market Conservation Area (LBH)	Medium	Low	Low	Negligible	Negligible
Gasholder No. 2	Low	High	Moderate	Medium	Minor Adverse
Gasholder No. 5	Low	High	Moderate	Medium	Minor Adverse
505, The Hare, Cambridge Heath Road	Low	Low	Low	Neutral	Neutral
11-12, Perseverance, Pritchards Road	Low	Low	Low	Negligible	Negligible
35-38 Andrews Road	Low	Low	Low	Negligible	Negligible
1 Ada Street Workshops, E8	Low	Low	Low	Negligible	Negligible
5-11 Victoria Buildings	Low	Low	Low	Negligible	Negligible
11 Mare Street	Low	Low	Low	Neutral	Neutral

Receptor	Heritage Value	Susceptibility to Change	Sensitivity	Magnitude of Impact	Likely Effect
During Operation					
Keeling House	High	Low	Moderate	Nil	Nil
Post at narrowing of road	Medium	Low	Low	Nil	Nil
2 posts at end of roadway	Medium	Low	Low	Nil	Nil
444 Hackney Road	Medium	Low	Low	Negligible	Negligible
446-450 Hackney Road	Medium	Low	Low	Negligible	Negligible
Railed wall and gate	Medium	Low	Low	Negligible	Negligible
456 Hackney Road	Medium	Low	Low	Negligible	Negligible
2 Pritchards Road	Medium	Low	Low	Negligible	Negligible
375-385 Hackney Road	Medium	Low	Low	Negligible	Negligible
363-373 Hackney Road	Medium	Low	Low	Negligible	Negligible
12-20 Mare Street	Medium	Low	Low	Nil	Nil
F Cooke's Eel, Pie and Mash shop	Medium	Low	Low	Nil	Nil
Regent's Canal Conservation Area (LBH)	Medium	Medium	Moderate	Low	Minor Beneficial
Regent's Canal Conservation Area (LBTH)	Medium	Medium	Moderate	Medium	Moderate Beneficial
Hackney Road Conservation Area (LBH)	Medium	Low	Low	Neutral	Neutral
Hackney Road Conservation Area (LBTH)	Medium	Low	Low	Negligible	Negligible
Broadway Market Conservation Area (LBH)	Medium	Low	Low	Negligible	Negligible
Gasholder No. 2	Low	Medium	Low	Medium	Minor Beneficial
Gasholder No. 5	Low	Medium	Low	Medium	Minor Beneficial
505, The Hare, Cambridge Heath Road	Low	Low	Low	Neutral	Neutral
11-12 Perseverance, Pritchards Road	Low	Low	Low	Negligible	Negligible
35-38 Andrews Road	Low	Low	Low	Negligible	Negligible
1 Ada Street Workshops, E8	Low	Low	Low	Neutral	Neutral
5-11 Victoria Buildings	Low	Low	Low	Negligible	Negligible
11 Mare Street	Low	Low	Low	Neutral	Neutral

E9.0 Abbreviations & Definitions

- 1 CA - Conservation Area
- 2 HE - Historic England
- 3 LBTH - London Borough of Tower Hamlets
- 4 LBH - London Borough of Hackney

E10.0 **References**

- 1 National Grid Archives, Warrington;
- 2 London Metropolitan Archives;
- 3 'Industries: Introduction' in *A History of the County of Middlesex: Volume 2, General: Ashford, East Bedfont With Hatton, Feltham, Hampton With Hampton Wick, Hanworth, Laleham, Littleton*. Ed. William Page (London, 1911). Pp. 121-132. Accessed via British History Online [<https://www.british-history.ac.uk/vch/middx/vol2/pp121-132>];
- 4 Pevsner Architectural Guides: The Buildings of England: *London 5: East*; O'Brien, Cherry & Pevsner (2005);
- 5 English Heritage: London Gasholders Survey: The Development of the Gasholder in London in the later 19th century (2000);
- 6 English Heritage: Gas Industry Step 3 Report for Monuments Protection Programme (2002); and
- 7 Archaeology South East: Bethnal Green Gasholders, London, Historic Buildings Record (Historic England Level 2) (2016).