

ADVICE from The Regent's Park Conservation Area Advisory Committee
12A Manley Street, London NW1 8LT

7 August 2023

Chester Terrace Gardens, Chester Terrace, London, NW1 4ND 2023/0282/P + 2023/0650/L

Demolition and rebuilding of listed garden retaining wall and balustrade.

The RPCAAC reviewed our advice dated 18 March 2023 at our meeting on 7 August 2023 in the light of the reconsultation. The Committee agreed that, taking account of the reconsultation and reviewing the proposals, it wished to restate its objections to the applications.

The RPCAAC was grateful to the Director of the CEPC for the site visit for the RPCAAC chair on 24 November 2022. Unfortunately, the submission of the planning application before the RPCAAC's next meeting made pre-app comment unfeasible. The RPCAAC received a report on the site visit at its meeting on 9 January when the proposals were discussed in outline. A summary of issues and documents submitted by the CEPC was circulated on 23 January 2023 and discussed in detail at the RPCAAC meeting on 6 February. The Committee further discussed draft advice at our meeting on 6 March, and this advice was circulated to members for final approval on 14 March 2023. At our meeting on 7 August 2023 the Committee agreed that, taking account of the reconsultation and reviewing the proposals, it wished to restate its objections to the applications.

1.0 Listed Building issues

1.1 We note that the balustraded retaining wall to Chester Terrace garden is Listed Grade II, but also forms a significant part of the setting of the Terrace itself, which is Listed Grade I. The balustrade visually links the Terrace itself with the gardens, which in turn face on to the Outer Circle and the Park itself.

1.2 We acknowledge the high standard of restoration of historic fabric undertaken by the CEPC, but seek further details and justification for the detailed forms proposed in this application.

1.3 It is stated in the Heritage Statement at 8.1 of the replacement balustrade that its 'precise form will follow that approved and carried out at Cumberland Terrace to the north with matching cast concrete bottle balusters, but with a more crisply defined, moulded base to the plinth symmetrical on both the road and garden sides'.

1.4 Given the major significance of the Listed Buildings in this case, we would expect to see a larger scale drawing showing the proposed baluster and plinth forms. This is specially important as it is proposed to vary the detail from the chosen model.

1.5 Given the historic sequence of building of the Regent's Park terraces, we also seek justification for the adoption of forms used in one terrace in another terrace. The specificity of historic forms should be respected.

2.0 Trees and historic landscape issues

2.1 We object strongly to the proposed loss of 20 established trees.

2.2 In general, the trees along the impact zone contribute significantly to the setting of the Listed Buildings. We cite some examples from the 20 trees it is proposed to cut down.

2.3 These include 2 *Ligustrum lucidum* (Chinese privet) understood to be of considerable age. They are identified in the applicant's *Arboricultural impact assessment*, by Tim Moya Associates (2022) as T217 and T 491 where they are stated to have a 20-40 year prospective lifespan. One of these trees, T217, is characterised in the CEPC's *Chester Terrace management vision* (2019) by Todd Longstaffe-Gowan at p. 22 as 'a characterful central feature of the garden'. The argument that this tree obstructs historic views of the central architectural feature of Chester Terrace should be modified in the light of the photo on p. 23 of the same report which shows 'the view east from Chester Road' which 'shows partial views to the central set of Corinthian columns [of Chester Terrace], flanked by mature trees'. We would suggest that this view is exemplary of the developed 'urban picturesque' landscape designed by Nash. Its premature loss would be harmful to the setting of the Listed Buildings.

2.4 Three holly trees, *ilex aquifolium*, are proposed for removal, T229, T494, and T 496, despite 40+ years life expectancies, and although such evergreens in the Park were admired by Nash's contemporaries – see James Elmes, *Metropolitan improvements: or London in the Nineteenth century* (1827) p. 28 on the 'lovely evergreens' at the Holme. It should also be noted that none of these three trees obstruct views of the central feature of the Terrace. Their premature loss would be harmful to the setting of the Listed Buildings.

2.5 The sweet chestnut, *Castanea sativa*, T210, also proposed for removal despite a 40+ years life expectancy, has value in the historic landscape. We note that the tree does not obstruct views of the central feature of the Terrace. Its premature loss would be harmful to the setting of the Listed Buildings.

2.6 We note the discussion of the removal of trees as part of a proposed restoration of the historic landscape, but we also note that the tree planting in the Park as a whole was admired from early in the development. For example, Elmes, in his *Metropolitan improvements* (1827) commented on the 'luxuriant vegetation of shrubs and trees' (p. 47) while admiring the 'trees and shrubs becoming umbrageous and park-like', and specifically noting of Cornwall Terrace 'the richness and correctness of style of whose architecture is aptly embellished by the sylvan scene before it' (p. 19). Later, when the planting had matured, Nathan Cole, in *The royal parks and gardens of London, their history and mode of embellishment* (1877) at p. 36 reported that some ranked Regent's Park as 'the first of our metropolitan parks' recording that 'It has a most beautiful surrounding of trees and shrubs', while '... the margin of this Park is very much diversified – wood and dale, and at intervals noble mansions and picturesque villas are scattered about half hidden by trees and shrubs.' The trees now provide a much valued green context for Chester Terrace including the linear views seen through the arches, which were picturesque additions by Nash himself to the original designs (see J. Mordaunt Crook, 'John Nash and the genesis of Regent's Park' in *John Nash, architect of the Picturesque*, ed. Geoffrey Tyack (2013), pp. 75-199 (p. 85). Elmes, *Metropolitan improvements* (1827), admired Chester Terrace specifically for 'its lofty arches and spacious plantations' (p. 23).

3.0 Sustainability issues

3.1 We also note the ecological diversity and value of these gardens as part of the Park and as developed over 200 years of continuous green space. Elmes, *Metropolitan improvements* (1827) suggests the first tree planting was begun in about 1817, before construction of buildings themselves was started (p. 20).

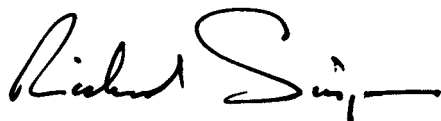
3.2 The ecological value of trees is specifically identified as significant in Camden's Local Plan (2017). In its Policy A3j, 'Biodiversity', 'Protection, enhancement and management of biodiversity' Camden states that it will 'resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation; ...'.

3.3 We advise that the 20 trees and vegetation threatened here are of significant amenity, historic, cultural or ecological value. The proposed replacement trees are not 'like for like', and would not have the established ecological value of the existing trees. We object to the proposed loss of 20 trees contrary to Camden's adopted Local Plan policy.

3.4 Materials – we are deeply concerned by the extent of the proposed reinforced concrete foundation structure. Camden's Local Plan (2017), on 'Sustainability and climate change' at para 8.18 Camden states that it expects all development to minimise materials required and use materials with low embodied carbon content.

3.5 We note that the chosen form of foundation structure is the most substantial of the options considered and has the most impact on, and does the most harm to, the historic landscape and ecology. The 'Addendum' report by HPM suggests other options, such as more modest bored piles. We urge a more subtle and less impactful method of creating new foundations, with the use of piles or bridging in specific locations to retain and reduce impact on the root-zones of important trees. We also question the need to use a 21 tonne excavator in a historic garden adjacent to Grade I and Grade II Listed buildings. While the techniques of construction are not normally a planning issue, in this case they are relevant to the protection of the historic landscape which forms the immediate setting for Listed Buildings. We also note that the proposed concrete foundation structure would limit future planting along the eastern side of the gardens. We urge a more sustainable approach consistent with the historic significance of the site, as well as with Camden's recognition of the Climate Emergency.

4.0 We are always happy to discuss or review revised proposals which address our objections and concerns.

A handwritten signature in black ink, appearing to read 'Richard Simpson', with a long horizontal flourish extending to the right.

Richard Simpson FSA
Chair