

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

6 November 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: revised submission dated 26 October 2023**

1. At its meeting on 6 November 2023 the RPCAAC reviewed the further substantial proposals for tree replacement added to application ref. 2023/0282/P on 26 October 2023. The RPCAAC was not notified of this further substantial submission.
2. The RPCAAC maintains our objection to the application as originally dated 7 August 2023.
3. The proposed tree replacements do not address our objections to the application.

*Loss of exceptional trees*

4. The revised proposals do not protect or fully replace the exceptional trees which would still be lost. These include the two *Ligustrum lucidum* and the Sweet Chestnut, the latter believed to be unique in these gardens. We argued in August:

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.

2.5 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.

5. We also objected to the loss of the holly trees:

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.

6. We noted that Camden's *Regent's Park Conservation Area Appraisal and Management Strategy*, formally adopted 2011, and current SPD, states at 7.6, on tree removal 'The Council would generally resist the removal of trees within the conservation area unless they were dead/dying/dangerous,

causing damage to buildings or not considered to be of visual or wildlife importance.’ None of these criteria for removal are met in the current proposals.

7. None of these losses would be effectively mitigated by the revised proposals: the harm to the setting of the Listed Buildings would be substantial, while the proposals would neither preserve nor enhance the character and appearance of the conservation area.

#### *Ecological issues*

8. The revised proposals for tree planting would not protect the current ecological value of the present planting.

9. We noted the ecological harm that would be caused by the loss of large canopy trees as most recently identified in the Report dated 30 October 2023 to Chester Terrace residents by S. J. Stephens Associates.

10. Camden has recognized the Climate Emergency: this should inform planning decisions as a matter of priority.

#### *Reasons given for felling trees – structural repairs*

11. The applicant makes two broad arguments seeking to justify their applications for the felling of trees. One is to enable the structural repair to the garden retaining wall and balustrade. As we advised in August, we acknowledge the need for repair, but with a less intrusive and more sustainable method. Our concerns were set out in our August advice at paras 3.4 and 3.5 where we urged 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.

#### *Reasons given for felling trees – restoration of the historic landscape*

12. The argument based on structural needs is supported by a second set of arguments which claim that the loss of trees is justified as a restoration of the historic views of the terraces from the Park. While we acknowledge that this argument has some merit, the nature of the historic views is open to debate, and therefore its value as a justification for the proposed tree felling in doubt. It was recognized by observers in the 1820s that at the time of building the planting was not mature – the early engraved views represent this pre-mature state which does not necessarily represent Nash’s long-term intentions. As we pointed out in our original objections, as the planting matured it was a much admired aspect of what was seen to be Nash’s achievement.

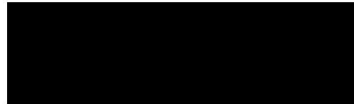
2.6 We note the discussion of the removal of trees as part of a proposed restoration of the historic landscape, but we also note that the tree planting in the Park as a whole was admired from early in the development. For example, Elmes, in his *Metropolitan improvements* (1827) commented on the ‘luxuriant 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).

13. Whatever the merits of the historic evidence, we argue strongly that any restoration scheme, once agreed, be implemented through a gradual approach, through the management of the existing trees and replanting when trees come to the end of their lives.

14. We noted that Camden's *Regent's Park Conservation Area Appraisal and Management Strategy*, at 7.6, on pruning, identifies pruning – not felling – as the approach to allowing important views to be retained. It states 'The unsympathetic pruning of trees would also be resisted. Trees that form part of the landscape of any part of the Park should be sensitively and minimally pruned to conserve the natural appearance of the canopy silhouette, whilst allowing some flexibility to reduce trees to allow important views through the park and estate to be retained.' Only through a gradual approach can the significance of the trees in the conservation area be preserved or enhanced.

15. The revised proposals for tree planting do not mitigate the harm the proposals would do to the heritage assets. The proposals for tree felling as they stand neither preserve the special significance of the Listed Buildings and their settings, nor preserve or enhance the character and appearance of the Regent's Park conservation area.



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