

PLANNING AND HERITAGE STATEMENT

8 GLOUCESTER GATE, REGENT'S PARK, LONDON, NW1 4HG

AUGUST 2024



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EXECUTIVE SUMMARY

Montagu Evans has been instructed by Mr Dory Gabbay and Mrs Tamara Gabbay (hereby referred to as the 'Applicant') to provide planning and heritage consultancy services and produce this Planning and Heritage Statement in support of this application for planning permission and listed building consent at 8 Gloucester Gate, Regent's Park, London, NW1 4HG (the 'Site').

The Site lies within the administrative boundary of the London Borough of Camden (the 'Council').

The description of development is:

Various alterations to dwelling house and mews including replacement of the rear extension, rebuilding of mews roof, internal refurbishment consisting of demolition and reposition of some partition walls and other associated works.

The Site comprises No. 8 Gloucester Gate and associated mews building, which forms part of a Grade I-listed terrace (Nos. 2-11) designed by John Nash (1762-1836) and built in c.1827 on the north-eastern side of Regents Park. The property is in use as a single dwelling house of four storeys over a lower ground floor/basement.

The Site also lies within the Regents Park Conservation Area.

Montagu Evans has provided heritage and planning advice over the course of the project, leading to the application now before the Council.

The proposals are described in detail in the accompanying *Design and Access Statement* prepared by Dowan Farmer Architects and the *Interior Details* brochure by Goddard & Studio. A suite of other documents also accompany the application to illustrate the comprehensive and considered approach to the development, in addition to illustrating how the scheme complies with statute, planning policy and guidance.

The principal considerations relating to the proposals are the effect on heritage assets. The planning considerations relate, principally to neighbourly amenity, parking and energy efficiency.

THE SPECIAL INTEREST OF THE LISTED BUILDING

No. 8 Gloucester Gate and the rear mews forms part of the wider terrace design by Nash in a monumental palace-style. Its grade I designation reflects the importance of Nash's design, itself the most important example of Picturesque urban planning in London.

The grandeur, composition and detailing of the principal frontage render it of primary interest; the rear elevation, although of stock brick and plainer, also survives largely in its original form. It is this façade that was considered by the Crown Estate in the 1960s to be of particular interest and worth preserving when there were contemplations of demolishing all the Nash terraces around Regent's Park.

The interior of the Application Site was not the work of Nash. Those internal spaces – consequently of lesser interest than the Nash façade – are now largely 20th century replica work, having been subject to extensive alterations through successive phases of renewal and alteration during the second half of the 20th century.

Like many of the houses in the Nash terraces surrounding Regents Park, No. 8 experienced the extensive reconstruction of the interior in the 1960s, when the entire terrace was restored and rebuilt for the Crown Estate by architect Louis de Soissons. Like several other houses in the terrace, No. 8 was converted to flats, and its conversion back to a single townhouse dates from the 1980s. The 20th century reconstruction comprised the replacement of a high degree of internal fabric (as evidenced by recent on site investigations) with notable exceptions being the general planform, principal staircase (albeit this has been altered too) and the secondary stair to the lower ground floor.

As a consequence of the 20th century rebuilding and subsequent alterations, the interiors retain only modest fabric that is original to the first phase of development and while the planform on ground, and first floors remain legible, the spatial proportion of many of the rooms is not original. In its extant condition, therefore, the interior is almost wholly 20th century replica work (including the secondary staircase), with areas of low-quality detailing.

The mews to the rear is contemporary with the principal dwelling and retains part of its original external form, including elements of its original structure such as the roof joists. It too has been substantially remodelled internally as a result of the 1980s phase of works.

In summary, therefore, it is the property's frontage to Regent's Park that is of exceptional value; the interior is proportionately of less interest due to the extent of change, though certain features and planform do survive which contribute to the special interest.

SUMMARY OF THE PROPOSALS

The proposals have been developed in response to this detailed understanding of the Application Site and can be summarised in three main areas:

1. Refurbishment of the main house;
2. Rebuilding of the closet wing; and
3. Refurbishment and alteration of the mews house.

REFURBISHMENT OF THE MAIN HOUSE

At the heart of the proposals are works to reinstate historic features and refurbish the main house in an appropriate and sympathetic way. These works have been conceived following on-site surveys of plasterwork, joinery and features such as the staircase and fireplaces by specialists (*Jamb* and *Locker & Riley*), through an understanding of the age and type of the building by Montagu Evans and Goddard & Studio, to deliver a sensitive refurbishment that seeks to reinstate the historic character and appearance of the property.

The majority of alterations, including the installation of modern services, are necessary and are justified to secure the long-term conservation of the building in a manner that meets the requirements of 21st century living. They have been designed to minimise impact to historic fabric and, in the majority of cases, represent an improvement to the existing condition.

The research and design development is set out in the comprehensive *Interior Details* brochure prepared by Goddard & Studio and conveys the care and attention that will be given to the interior in order to reinstate the formality and appropriate features into the building.

REPLACEMENT OF THE CLOSET WING

The main alteration affecting the Application Site is the rebuilding of the closet wing with new form that would retain as much fabric as possible from the existing. This new addition is referred to throughout this document as the "annex".

The annex will occupy a similar location as the existing closet wing, extending to the north and in a manner that had been approved in the 1980s but not implemented.

A similar form of development was recently completed at 10 Gloucester Gate, where the planning process considered a similar set of circumstances to what we find at No. 8; the form and pattern of development on the terrace is almost facsimile, and there are few ways to address the issues we find today with the buildings: hemmed-in and poor quality rear courtyards that are limited by the two floor levels; narrow galley kitchens; and inefficient use of internal space that has been subject to extensive change.

The bow is an interpretation of an architectural form found in Neo-Classical architecture, and which, notably, has been used in the closet wing of No. 7 Gloucester Gate and the recently completed scheme at No. 10 Gloucester Gate.

The aesthetic impression will be of a new addition that is of high quality yet is modest in its external expression and reflects the informality of a secondary component as part of the principal house – ie the ancillary closet wing.

The aim of the proposals prepared by Dowan Farmer Architects has been to replace the much-altered closet wing with a new façade designed to a high standard. The design has responded to pre-application feedback from the Council by:

- introducing a higher ratio of solid to void; asymmetry reflecting the unresolved and secondary appearance of the existing building;
- a reduced bow that steps in from where the building meets the rear of the main house and the mews; and
- amended façade treatment particularly to the to the lower floor to ensure that the bow would not be prominent in the views from the main house and the mews, and therefore would not draw the eye from the interior or detract from the formality of the principal building.

Design quality is a significant planning consideration at all tiers of the planning policy cascade, from the National Planning Policy Framework (NPPF), through to the statutory Development Plan.

We appreciate that the judgement on quality and acceptability will vary. However, in our judgement the proposal will add a new element that reflects the existing character yet demonstrably improves the way that the property will appear and function.

REFURBISHMENT OF THE MEWS BUILDING

The final aspect of the design is to sensitively refurbish the mews building while providing new access across the Application Site.

The interior fabric, which is of 1980s construction, will be removed to retain the garage at lower ground level, and a new space at ground floor that will extend to the roof structure.

SUMMARY ASSESSMENT

From the Courts' interpretation of **Section 16(2)** and **Section 66(1)** of the 1990 Act, considerable importance and weight should be given to the desirability of preserving the special interest of listed buildings in any balancing exercise with material considerations which do not have this status.

The considerable importance and weight to the desirability of preservation should tip the scales to produce an unequal balance in its favour. However, the decision-maker should still take account of the scale of change, and so the extent of impact, as well as the relevance to its significance, and the importance of the asset. The overall weight to be given to any harm should be a product of these factors.

There are two principal designated heritage assets in this case: the main house and the CA. Both assets must be assessed individually to inform and calibrate the extent of countervailing public benefits that may be required to outweigh any harm.

We have identified a low level of less than substantial harm to the listed building derived from the following works:

- Installation of roof-mounted condenser enclosure to 8 Gloucester Gate;
- Loss of 19th century fabric associated with the demolition of the closet wing;
- Creation of a double-width opening between the principal rooms at ground floor level;
- Alterations to planform at second floor level to accommodate the relocation of the secondary staircase; and
- The setting impact deriving from the creation of two glazed openings within the blind arcade to the rear of mews.

We find no harm to the significance of the CA or nearby listed buildings on account of the fact that the majority of works are internal. The remainder that are external are beneficial as we explain below.

PUBLIC BENEFITS

Paragraph 208 of the NPPF requires a balance in an instance of less than substantial harm to the significance of a designated heritage asset.

DESIGN QUALITY

The first consideration must be that the quality of architecture and design prepared by Dowan Farmer Architects and Goddard & Studio is of the highest calibre. It would demonstrably uplift the quality of the exterior of the building and to interior by refurbishing in a sensitive manner that will secure the long-term future of this highly graded listed building.

The use and application of materials in the new annex subtle, yet effective in emphasising the historic forms and rich architectural detailing of the existing building. The fine attention to detail is reflected in the submission.

HERITAGE BENEFITS

We consider that the heritage benefits of the proposed development are as follows, and form part of the overall justification of the development:

- Securing the long-term future and conservation of the listed building through a comprehensive refurbishment and alteration in a single phase;
- Replacement of the modern stone hallway with a more appropriate design and materiality;
- Reinstating the original proportions of the opening between the first floor principal rooms;
- Refurbishment of the principal staircase, and improvements to both the basement and secondary staircases;
- Scholarly repairs and reinstatement of appropriate decorative plasterwork and joinery throughout the building;
- The removal of existing fireplaces of varying quality and age, and installation of appropriately detailed fire-surrounds to each of the principal rooms;

- Replacement of 1980s fabric with appropriately-detailed fixtures, fittings and finishes executed to a high specification;
- Removal of low-quality 1980s fitted joinery;
- General improvements to the layout and circulation through the listed building, particularly in relation to the proposed new annex and the mews house; and
- Positive setting impacts deriving from the high-quality design of the new annex to the rear and the associated landscape improvements to the courtyard.

Taking account of the considerable importance and weight that should be given to the desirability of preserving the special interest of listed buildings, we have found the overall weight to the harm to the significance of the listed building that comprise the Site as being low.

We consider that the heritage benefits of the development are substantive and weighty, and have been arrived at following a detailed and iterative design process.

In our judgement, when the less than substantial harm is weighed against the heritage public benefits of the scheme we consider that the harm would be outweighed leading to a net enhancement if applying the “internal heritage balance”.

Nevertheless, if the Council consider there to be ‘net harm’ then we also reference additional benefits associated with improving the energy efficiency of the building (an important aspiration during a time of climate change).

POLICY COMPLIANCE

Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, development plan forms the starting point for determination of this application.

On account of finding less than substantial harm and undertaking the heritage balancing exercise we find that the proposals accord with the London Plan (2016) Policies 7.4 (local character) and 7.8 (heritage assets and archaeology); London Plan Policy HC1, and Local Plan Policies relating to design (D1, D2 and D3), sustainability (CC1 and CC2), noise and vibration (A4), and Parking (T1 and T2).

Consequently, we consider the development would comply with the policies within the development plan.

On that basis the decision maker is able to discharge their legal duties under **Sections 16(2), 66(1) and 72(1)** of the Planning (Listed Buildings and Conservation Areas) Act 1990.

1.0 INTRODUCTION

8 GLOUCESTER GATE, REGENT'S PARK, LONDON, NW14HG

INTRODUCTION

- 1.1 Montagu Evans has been instructed by Mr Dory Gabbay and Mrs Tamara Gabbay (hereby referred to as the 'Applicant') to provide planning and heritage consultancy services and produce this Planning and Heritage Statement in support of this application for planning permission and listed building consent at 8 Gloucester Gate, Regent's Park, London, NW1 4HG (the 'Site').
- 1.2 The Site lies within the administrative boundary of the London Borough of Camden (the 'Council').
- 1.3 The description of development is:
Various alterations to dwelling house and mews including replacement of the rear extension, rebuilding of mews roof, internal refurbishment consisting of demolition and reposition of some partition walls and other associated works.
- 1.4 Montagu Evans has provided heritage and land-use planning advice over the course of the project, leading to the current application. This has involved consultation with the Council.
- 1.5 Montagu Evans has conducted numerous site visits, including with London Borough of Camden officers, and has inspected the recent investigation works into the extant fabric. The assessment presented in this report is based on that visual inspection and informed by desk-based research and documentary evidence.

THE SITE

- 1.6 The Site comprises No. 8 Gloucester Gate and associated mews building, which forms part of a Grade I-listed terrace (Nos. 2-11) designed by John Nash (1762-1836) and built in c.1827 on the north-eastern side of Regent's Park. The property is in use as a single dwelling house of four storeys over a lower ground floor/basement. The list description is provided at **Appendix 1.0**. The Site is also located in the Regent's Park Conservation Area (the 'CA').



Figure 1.1 Photograph of 8 Gloucester Gate.

THE PROPOSALS

- 1.7 A description of the Proposed Development is provided within the Design and Access Statement prepared by Down Farmer Architects which is submitted with this application for planning permission and listed building consent. The proposals may be summarised as:
- *The refurbishment of the main house, including improvements to the extant planform arrangement and sensitive restoration of period features;*
 - *The rebuilding of the mid-19th century closet wing, which forms the rear extension to No.8 Gloucester Gate, with a contemporary annex that connects the main house with the associated mews house to the rear at lower ground and ground floor levels;*
 - *The refurbishment of the mews house, including removal of modern planform at first floor, to create an open-plan studio space that is accessible from the closet wing of the main house, and works to the roof.*
- 1.8 The proposals follow the recent purchase of the property by the Applicants and reflect their desire to refurbish the property for use as their family home.
- 1.9 The Design team, which includes Down Farmer Architects and Goddard & Studio, has also taken the opportunity, through the design development, to identify areas where the special interest of this listed building could be better revealed.
- 1.10 It is apparent, as evidenced by the research undertaken to-date and presented within this report, that this is a property that has been subject to several phases of alteration and renewal from the mid-20th century onwards. As a consequence, historic fabric has been lost and the spatial proportions of parts of the planform have been compromised. Most notably, the building has not been refurbished since the 1980s.
- 1.11 Accordingly, the proposals seek to reinstate – where appropriate and technically feasible – architectural features within the listed building that have been lost or their character diminished through later alteration. The proposals have been informed by the research and fabric analysis presented here.

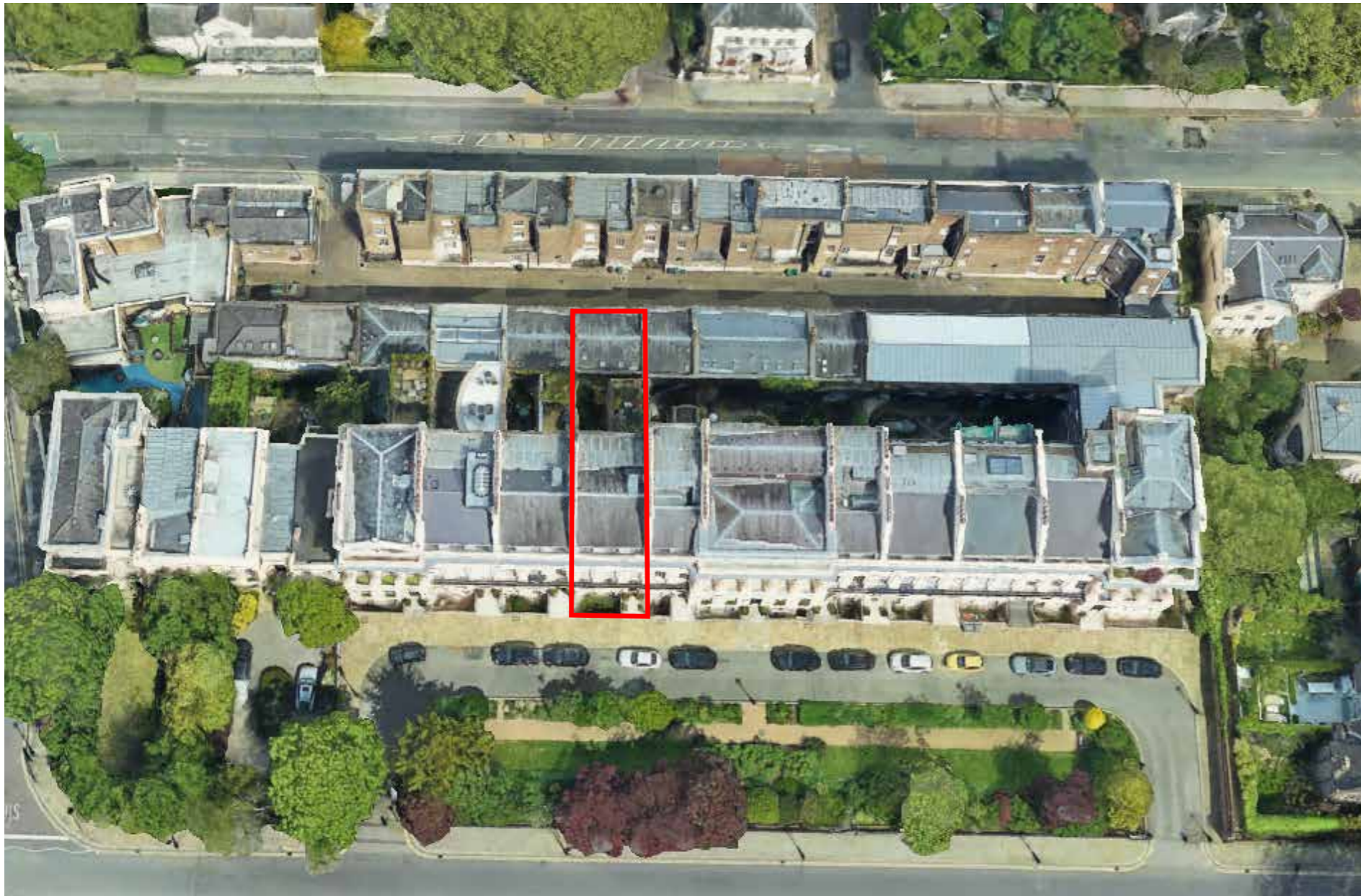


Figure 1.2 Aerial View of 8 Gloucester Gate. Source: Google (base map)

PRE-APPLICATION CONSULTATION

- 1.12 The National Planning Policy Framework (NPPF) (December 2023) recognises at Paragraph 39 that:
‘Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre application discussion enables better coordination between public and private resources and improved outcomes for the community.’
- 1.13 The proposals are the result of close consultation during design development between the Applicant’s design team and the Council. The proposals were the subject of a pre-application consultation meeting with the Council in April 2024. Historic England have also been approached to advise on the emerging proposals at pre-application stage but considered that it was appropriate for them not to be involved and for the local authority to advise on the proposals.
- 1.14 In essence, the Proposed Development has sought to respond to the feedback received from the Council in May 2024. This has included changes to the arrangement, scale and massing of the new extension to be more sensitive to the host building, refinements to the internal platform to retain the original hierarchy, and a more sensitive approach to new architectural interventions.

PURPOSE OF THIS REPORT

- 1.15 This report provides an assessment of the impact of the Proposed Development on the Grade I-listed property and the Regents Park CA, as well as other relevant planning matters.
- 1.16 By virtue of paragraph 200 of the NPPF (2023), applicants for development proposals which have an effect upon the historic environment are required to describe the significance of identified heritage assets to enable an understanding of the impact of the proposals. This report fulfils that requirement at **Sections 3.0** and **4.0** by providing an understanding of the historic development of the site and its historic and architectural value.
- 1.17 This Planning and Heritage Statement forms part of a suite of application documents comprising:
- 1.17.1 *Application Drawings and Design and Access Statement* prepared by Downen Farmer Architects
 - 1.17.2 *Schedule of Works* prepared by Downen Farmer Architects
 - 1.17.3 *Exploratory Works Document* prepared by Downen Farmer Architects
 - 1.17.4 *Interior Detail Pack* prepared by Goddard & Studio
 - 1.17.5 *Schedule of Finishes* prepared by Goddard & Studio
 - 1.17.6 *Schedule of Details* prepared by Goddard & Studio
 - 1.17.7 *Structural Statement* prepared by Michael Alexander Consulting Engineers Ltd
 - 1.17.8 *Plant Noise Impact Assessment* prepared by EEC
 - 1.17.9 *Energy & Overheating Risk Statement* prepared by XCO2
 - 1.17.10 *MEP drawings* prepared by SWP Ltd

2.0

LEGISLATION AND PLANNING POLICY

8 GLOUCESTER GATE, REGENT'S PARK, LONDON, NW14HG

LEGISLATION AND PLANNING POLICY

STATUTORY FRAMEWORK

- 2.1 The legislative framework relevant to these proposals comprises:
- 2.1.1 The Town and Country Planning Act 1990;
 - 2.1.2 The Planning and Compulsory Purchase Act 2004; and
 - 2.1.3 The Planning (Listed Buildings and Conservation Areas) Act 1990 (“the P(LBCA) Act 1990”).
- 2.2 Legislation relating to the protection of the historic environment is set out in the Planning (LBCA) Act 1990. This requires local planning authorities to have special regard to the desirability of preserving the special interest of listed buildings and their settings, and to the desirability of preserving or enhancing the character or appearance of a conservation area.
- 2.3 8 Gloucester Gate is a statutorily listed building and is located in the Regent’s Park Conservation Area.
- 2.4 Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires a decision maker considering whether to grant listed building consent for any works, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 2.5 Section 66(1) of Act requires the decision maker considering whether to grant planning permission for development which affects a listed building or its setting to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 2.6 Section 72(1) requires that in the exercise of all planning functions, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the area. The statutory provision is satisfied if development proposals preserve or enhance the character or appearance of a conservation area.

- 2.7 Whether relating to works (S16(2)) or development (S66(1)) the statutory duties must be interpreted as relating to the whole of the works, or the totality of development, and the obligation is discharged on the basis of that total impact.
- 2.8 The development as a whole may include works or changes of use which may be harmful and which may be beneficial. Indeed, the test of preservation can only be met on a net basis. This is the approach that South Lakeland¹ established in relation to Section 72, which is a cognate provision.
- 2.9 It is logical that almost any works of modernisation to a listed building will entail some elements of harm, which might include the necessary replacement of original fabric or the alteration / removal of fabric to enable essential services.
- 2.10 The grant of consent for such works are not deemed to be contrary to Section 16(2).
- 2.11 We are mindful of the great weight that is given to the conservation of heritage assets; case law has made clear that the statutory duty to preserve must be accorded ‘considerable importance and weight’².
- 2.12 National policy (discussed further below) supports this proposition: paragraph 205 of the NPPF (2023) sets out that when considering the impact of a proposed development on the significance of a designated heritage asset, ‘great weight should be given to its conservation’. It goes on to state that ‘the more important the asset, the greater the weight should be’.

STATUTORY DEVELOPMENT PLAN

- 2.13 Statute requires that planning applications must be determined in accordance with the adopted Development Plan unless material considerations indicate otherwise, and that the Development Plan should be read as a whole.³
- 2.14 In this case, the statutory Development Plan comprises:
- 2.14.1 London Plan (2021); and
 - 2.14.2 Camden Local Plan (2017).

¹ South Lakeland District Council Appellants v Secretary of State for the Environment and Another Respondents [1992]

² Barnwell and several subsequent decisions, whose import is now reflected expressly in the NPPF, in paragraph 205.

³ Sections 38(3) and 38(6) of the Planning and Compulsory Purchase Act 2004.

LONDON PLAN (2021)

- 2.15 Policy HC1 of the London Plan (“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.’

CAMDEN LOCAL PLAN (2017)

- 2.16 Policies D1 and D2 of Camden’s Local Plan relate to design and heritage. Policy D1 requires that design respects local context and character and preserves or enhances the historic environment and heritage assets.
- 2.17 The policy also requires development that is sustainable in design and construction, carefully integrates buildings services equipment, comprises details and materials that are of high quality, and is inclusive and accessible for all.
- 2.18 Policy D2, Heritage, seeks to implement the statutory provision. With regard to designated heritage assets, it states that the Council: *‘will not permit development that results in harm that is less than substantial to the significance... unless the public benefits of the proposal convincingly outweigh that harm’.*
- 2.19 The balancing provisions contained in this policy allows a decision maker to reach an overall view with regard to a heritage asset; on whether or not the proposed works to a listed building result in net benefit overall, are neutral, or cause net harm overall.

OTHER PLANNING CONSIDERATIONS

- 2.19.1 Local Plan Policy A1 – Managing the impact of development – seeks to protect the quality of life of occupiers and neighbours and to protect against unacceptable harm to amenity.
- 2.19.2 Policy CC1 (Climate change mitigation) requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and operation.
- 2.19.3 Policy CC2 (Adapting to climate change) requires development to be resilient to climate change and adopt appropriate adaptation measures, although many of those outlined within the policy are not applicable to a scheme of this size.

2.19.4 Policy CC2 also seeks to ensure that development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation. The policy expects domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEAM domestic refurbishment.

2.19.5 Policy CC5 (Waste) seeks to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031. The policy also seeks to make sure that developments include facilities for the storage and collection of waste and recycling.

2.19.6 Policy A4 (Noise and Vibration) seeks to control and manage noise and vibration.

MATERIAL CONSIDERATIONS

NATIONAL PLANNING POLICY FRAMEWORK (DECEMBER 2023)

2.20 The approach to assessment of heritage impact underpinning the national policy may, in the interest of brevity, be expressed as a series of principles:

2.20.1 First, the significance of all heritage assets needs to be identified in a manner proportionate to their importance (Paras. 200 & 201 of the NPPF). The heritage interest of any asset may be archaeological, architectural, artistic or historic (Annex 2: Glossary, NPPF). The setting of a heritage asset may contribute to that significance or an appreciation thereof. Hence a change to setting can harm significance.

2.20.2 Second, the assessment must consider the impact of the development and its effect on the significance of the identified heritage assets as whole, with great weight given to the conservation of designated heritage assets (Para. 205).

2.20.3 If the Proposals have no harmful effect on the significance of any identified designated heritage asset, then ‘conservation’ (as defined in the Glossary to the NPPF) is achieved. If the Proposals enhance or benefit that significance, or enhance our ability to appreciate that, then these benefits attract significant weight as a matter of policy.

2.20.4 If, on the other hand, the Proposed Development is held to cause harm to the significance of a designated heritage asset, such harm should be categorised as substantial or less than substantial (Paras. 207 & 208 respectively), and within each category the extent of harm should be clearly articulated (Planning Practice Guidance or ‘PPG’ Para. 18).

2.20.5 The nature and extent of harm is important to ascertain because that informs the balancing out of any harm under the terms of Para. 208. Underpinning this approach is the principle of proportionality. Whilst any harm to a designated asset is ‘weighted harm’, it is important for the decision maker to assess the extent, nature or degree of harm through the exercise of planning judgement.

2.20.6 In either case, if a proposal would result in harm to the significance of a designated heritage asset, great weight should be given to the asset’s conservation (Para. 205), meaning the avoidance of harm and the delivery of enhancement where appropriate. Notwithstanding the ‘great weight’ provision, it would be unreasonable for an impact that is minor in nature or limited to lead to a refusal of permission. What matters, then, is the nature and extent of any harmful impact.

2.20.7 Any harm to the significance of a designated heritage asset should require ‘clear and convincing justification’, as per Framework Para. 206. A clear and convincing justification does not create a freestanding test requiring the demonstration of less damaging alternatives. To the extent that there is a test it is to be found in Framework Paras. 207 (in the case of substantial harm) and 208 (in the case of less than substantial harm).

2.20.8 In either case, and particularly looking at less than substantial harm, the clear and convincing justification the NPPF requires is thus made out through no more than the countervailing public benefits delivered by a proposal. Public benefits can include heritage benefits and can also include benefits to the way an area appears or functions or land use planning benefits.

2.20.9 Concerning non-designated heritage assets, Para. 209 of the Framework requires a balanced judgement to decision making, having regard to the scale of any harm or loss, and the significance of the heritage asset.

2.21 In the Court of Appeal Judgment known as Bramshill, Lindblom LJ⁴ explains the above approach, and also the interaction as between the NPPF, statutory provision, and the development plans⁵. The judgment also identified that a decision maker can consider the overall aggregate effect of a proposal affecting the significance of a designated heritage asset. This necessarily involves considering works of enhancement alongside works which might be considered harmful, with the ‘special regard’ provision applying to both. Bramshill established that this “internal heritage balance” approach to discharging the statutory duty is valid and for the decision maker to decide.

2.22 Read together, paragraphs 205 and 208 of the NPPF are effectively parallel to the reasoning presented in Local Plan Policy D2 cited above. In our view, it is possible, both within the development plan and within the NPPF, to undertake the ‘netting out’ exercise of harm versus benefit to reach an overall conclusion on impact, and we consider that this approach is consistent with the statutory interpretation.

2.23 As clarified in the Rottingdean judgement⁶ significant weight attaches to both harm and benefit to a listed building, and these should be brought into a single balance under the statutory provisions.

2.24 In relation to the above, paragraph 164 states that in determining planning applications, local planning authorities should also give ‘significant weight’ to the need to support energy efficiency and low carbon heating improvements to existing buildings. We argue that, in this case, such considerations should be weighed in the balance with reference to the policies set out within Chapter 16 of the NPPF.

⁴ City and Country Bramshill Limited v Secretary of State for Housing Communities and Local Government [2021] EWCA Civ 320.

⁵ The “internal heritage balance” sometimes referred to as the ‘Palmer’ approach, after the case of that name (Palmer v Herefordshire Council & ANOR [2016] EWCA Civ 1061). The Court of Appeal judgment in the matter of Bramshill clarified that although the ‘Palmer’ approach is one such approach to the balancing exercise – it is not the only such approach.

⁶ Safe Rottingdean Ltd v Brighton and Hove City Council EWHC 2632[86].

OTHER MATERIAL CONSIDERATIONS

2.25 We are mindful, in forming our assessment, of the following best practice guidance and documents that are material to an assessment of these proposals.

2.25.1 National Planning Practice Guide

2.25.2 Historic England, Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015);

2.25.3 Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017);

2.25.4 Historic England Advice Note 18: Adapting Historic Buildings for Energy and Carbon Efficiency (2024);

2.25.5 CPG Design (2021);

2.25.6 CPG Energy efficiency and adaptation (2021);

2.25.7 CPG Home Improvements (2021); and

2.25.8 CG4 Regent's Park Conservation Area Appraisal (2011).

3.0

HISTORIC DEVELOPMENT

8 GLOUCESTER GATE, REGENT'S PARK, LONDON, NW14HG

HISTORIC DEVELOPMENT

- 3.1 This section provides a description of the historic development of the site and the surrounding area. It also serves to place 8 Gloucester Gate within its architectural and historic context.
- 3.2 This section has been informed by relevant secondary source material, with reference to archival, documentary, and cartographic evidence. We have also had regard to the Survey of London (1938) and the Council's Regent's Park Conservation Area Appraisal and Management Strategy (2011).

BRIEF HISTORY OF REGENT'S PARK

- 3.3 Historically, the area known as Regent's Park comprised part of the ancient manor of Marylebone. During the Middle Ages the land was leased to the nunnery of Barking. Following the Reformation in the 16th century, the land passed over to the Crown, who subsequently enclosed it to form a deer park known as Marylebone Park. In 1646 the parkland passed to Oliver Cromwell, who let it out as small holdings, until it was reverted back to the Crown under Charles II in 1660. In 1668 the land was 'disparked' and subsequently leased for dairy farming and hay making until the turn of the 19th century.
- 3.4 The planned development of Regent's Park was initiated towards the end of the 18th century by John Fordyce, Surveyor General to His Majesty's Land Revenue. In 1794, during the reign of King George III, Fordyce made a new and accurate survey of the Regent's Park Estate. At the time, the Park was in the hands of the Duke of Portland whose lease was due to expire in 1811.

- 3.5 Fordyce subsequently identified the land as suitable for new development, despite the local heavy clay soil and absence of ground wells for fresh water, and from 1793 to 1809 began to sketch out the parameters for achieving it.
- 3.6 Following the death of Fordyce in 1809, his office was combined with that of the Surveyor General of Woods, Forests, Parks, and Chases and placed under the control of three Commissioners Woods, Forests and Land Revenues in 1810. The official architects of both former departments – Leverton and Chawner of the Land Revenues, and John Nash and James Morgan of the Woods and Forests— we approached to prepare schemes. By October 1811, Nash and Morgan's appointment had been approved by the Treasury.

DEVELOPMENT OF REGENT'S PARK AND ITS TERRACES

- 3.7 The appointment of John Nash for the comprehensive design of The Regent's Park along with an elegant new street, Regent's Street, to link it to St James's Park and the Prince's London residence at Carlton House, signalled the start of one of the most complete and comprehensive development schemes in the history of central London (**Figure 3.1**).

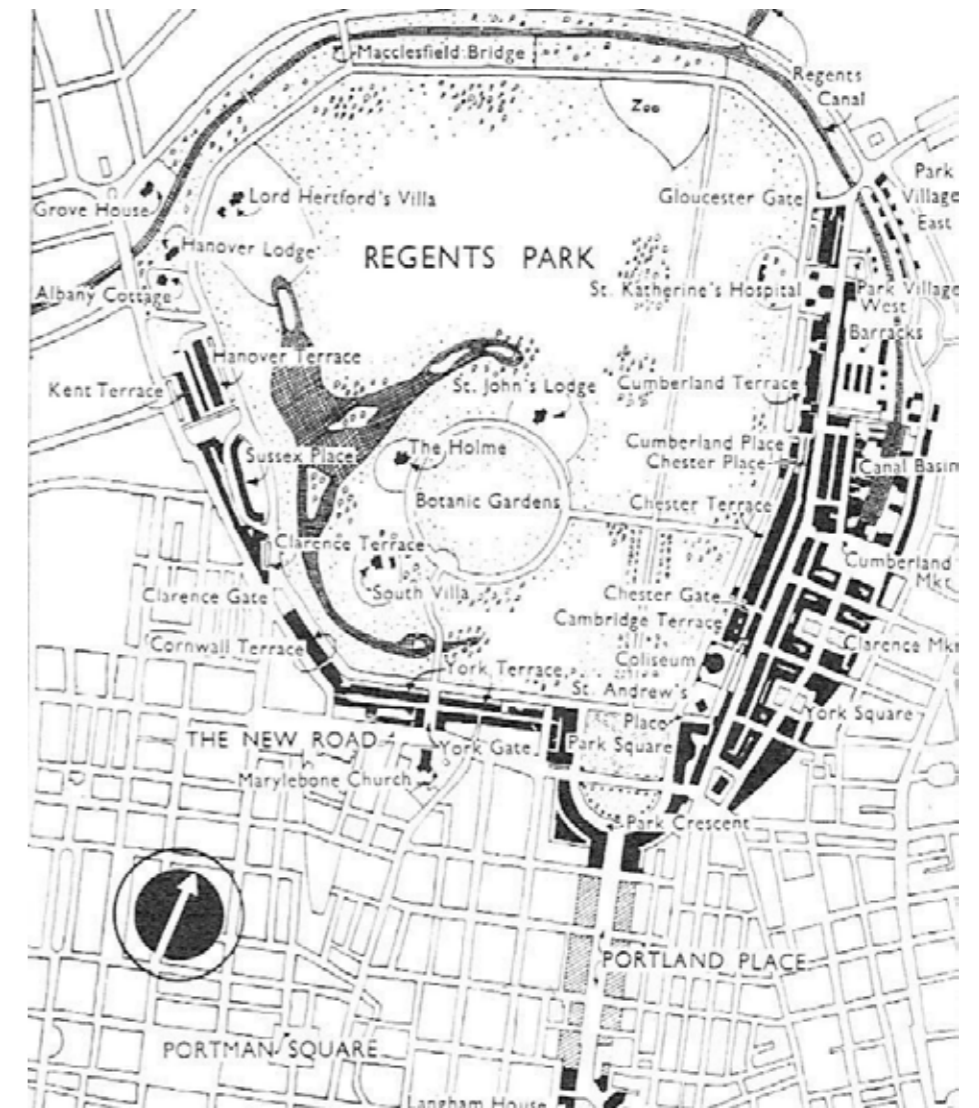


Figure 3.1 John Nash masterplan for Regent's Park Estate, 1811.

3.8 From the outset, Nash intended Regent's Park to be an exclusive suburban development, with the land reserved for the 'wealthy and the good.' Under the patronage of the Prince Regent, Nash had originally planned a palatial summer residence for the Prince, 50 detached villas in a parkland setting and elegant Classically-influenced terraces around the exterior of the park.

3.9 In total, Nash produced five iterations of his scheme for Regent's Park between 1812 and 1826, responding to the desires of both the Government and the Crown to reduce the amount of private land while providing the requisite amount of grand villas and terraces. Of the fifty-six villas proposed within the park only eight were built and the number of terraces was reduced.

3.10 By 1828, the development of Regent's Park was largely complete. The evolution of Nash's design process is well documented in maps and plans from this period. The outer terraces, named after titles held by the Prince's family, and the lake (from the Tyburn River) were built to the south, east and west of the park. The north side was originally left open to protect the views of Hampstead and Highgate.

3.11 The design of the park itself, which included contrived 'natural' scenery, shows the influence of Humphrey Repton (1752-1818), with whom Nash had worked closely. The park was planned on 'Picturesque' rather than formal principles, a design approach which was popularised by Nash, and for which he became noted and esteemed. The retention of the existing park-like character enabled those terraces grouped at the edge of the park to face a 'rural', naturalistic scene (Figure 3.2). It is within this setting that the Site is experienced.

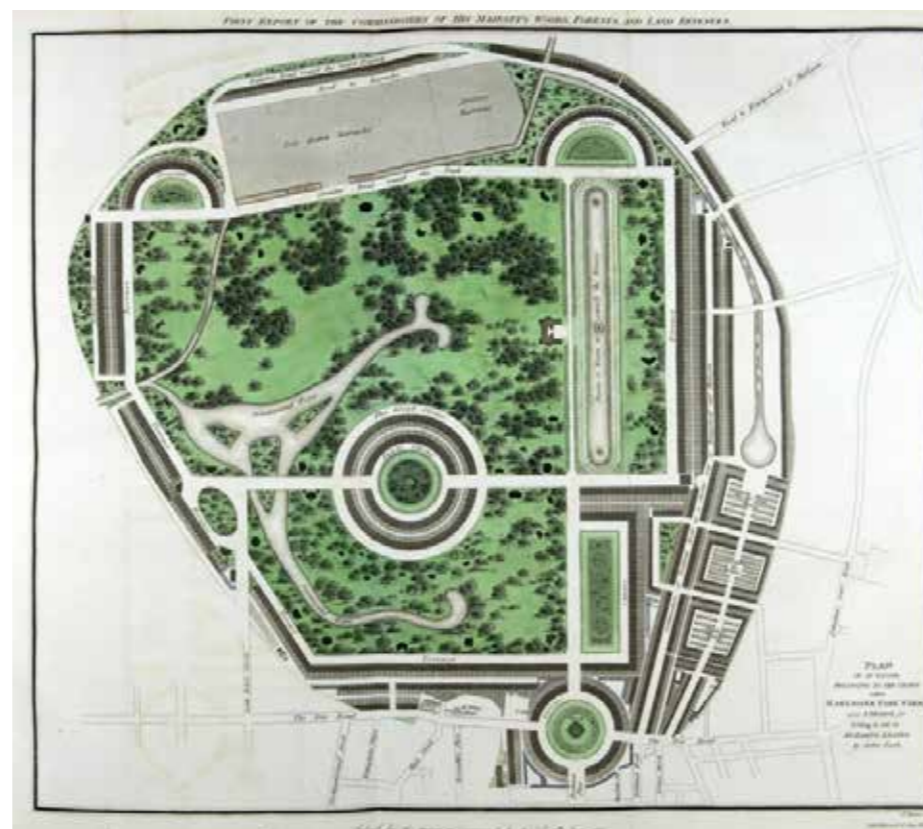


Figure 3.2 Plan of Regent's Park by John Nash, 1812.

3.12 Gloucester Gate, on the east side of the park, was one of the last of the outer terraces to be built, along with Cumberland and Chester Terraces, in 1826-28. As a result, it does not appear on the 'Plan of the Regent's Park' published by Thomas Hosmer Shepherd in 1827 (Figure 3.3).

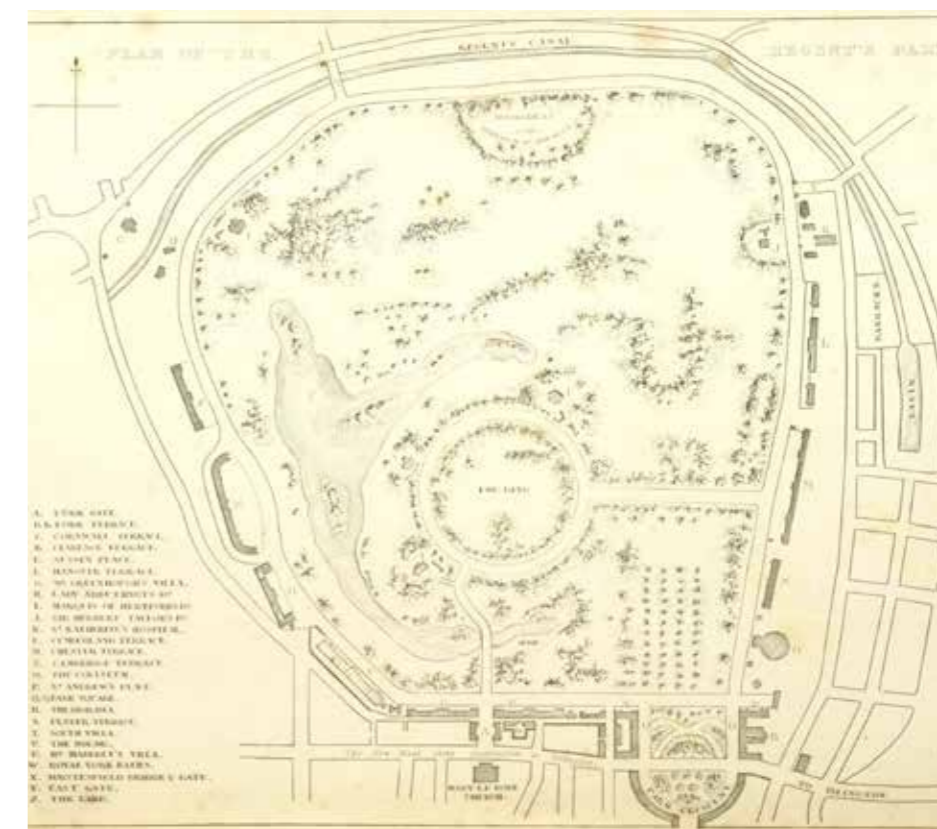


Figure 3.3 Plan of the Regent's Park by Thomas Hosmer Shepherd, 1827.

3.13 Nash's design for Regent's Park, which remains substantially intact, is described in the list entry as one of the most ambitious urban parks of the early-19th century.

3.14 Shortly after its completion, 8ha of land to the north of the park was acquired by the Royal Zoological Society. Four years later, a further 7ha was leased to the Toxophilite Society and in 1838 the 7ha of land within the Inner Circle was leased to the then newly formed Royal Botanic Society.

3.15 Following an Act of Parliament in 1842, the park was opened to the public and has continued to evolve as a park principally used for recreational purposes to this day.

GLOUCESTER GATE AND REGENCY DOMESTIC ARCHITECTURE

- 3.16 Originally known as Gloucester Terrace, Gloucester Gate was built to the east side of the Park beyond the Outer Circle. It was designed by Nash, as part of his masterplan for the development of Regent's Park, with some additions of the same period attributed to Joseph John Scoles, the site architect. Richard Mott, glazier, was responsible for the building of the terrace.
- 3.17 As discussed above, with the exception of Cambridge Gate towards the southern end of the park, Gloucester Gate was the last of the four groups of Regency buildings to the east of the Park to be constructed. Whilst not shown in Shepherd's 1827 plan, the terrace does appear in Greenwood's survey of 1830, which gives a detailed plan of Regent's Park and shows the terraces as they were built (**Figure 3.4**).
- 3.18 The terrace was built of brick, rendered in stucco, and had a rusticated ground floor. The use of stucco instead of exposed brick in Regency architecture was popularised by Nash across many of his fashionable developments in central London.



Figure 3.4 Extract from Map of London by C. & J. Greenwood, 1830.



Figure 3.5 Panoramic view of the area around Regent's Park showing Gloucester Gate with figures in the foreground, 1831.

- 3.19 The terrace comprised a row of 'First Rate' Regency houses, which conformed to the architectural principles and characteristics of the period, and was set back from the Outer Circle behind an enclosed area with mature trees and vegetation enclosed by wrought iron railings. A panoramic view of Gloucester Terrace from within Regent's Park was published in 1831 (**Figure 3.5**).
- 3.20 'Rates' of houses were codified in the Building Act of 1774, which sought to prevent poor quality construction and reduce the risk of fire. The introduction of these 'rates' ensured a standard of speculative building: a 'First Rate' house was valued at over £850 per year in ground rent and occupied more than 900 square feet, whilst a 'Fourth Rate' house was valued at less than £150 per year in ground rent and occupied less than 350 square feet.
- 3.21 As built, the terrace presented a symmetrical composition of three principal storeys, although the larger central (No.6) and flanking (Nos.2 and 11) properties comprised four principal storeys.
- 3.22 The principal design feature of the terrace was the range of double-height fluted pilasters of the Ionic Order on pedestal bases, rising through the first and second floors, which stood on a podium, jointed to imitate masonry, on the ground floor.
- 3.23 Above the pilasters was continuous architrave and dentilled cornice with a parapet and balustrading, some of the balusters being removed to admit attic windows. According to the Survey of London, the design of the chimney stacks suggests the intention of a more important attic, such as those at Cumberland Terrace, but this was not executed.
- 3.24 The central and end properties of the terrace were further articulated by six and four columns respectively in front of the lines of pilasters. These columns stand upon the front walls of three of the houses which are projected forward to support them and the columns or colonnades are surmounted by the full entablature and balustrading. The main wall behind is carried up to form an "attic" carrying a pediment at either end of the terrace and a flat roof over the central feature.
- 3.25 Across the terrace, the door and window openings were relatively plain. Each house had a maximum of three openings to each floor. Fenestration in Regency domestic architecture continued to be determined by Georgian proportions, and thin glazing bars continued to divide windows into twelve or more rectangular panes.
- 3.26 Nash introduced variety through the planning of certain houses within the terrace. The central feature comprised a single house, which was "double fronted" with a central entrance doorway flanked by two windows on either side and an architrave with console brackets supporting an entablature. The end houses featured decorative pediments.
- 3.27 On either side of the large central house, Nash planned two smaller ones, only two windows wide instead of three. The staircase, top lit and built of Portland stone, was placed between the front and back rooms and a passage from the front door extended beyond the staircase hall to a projection on the back elevation containing a cloakroom. This scheme was no doubt originally adopted, with certain variations, in all the houses.



Figure 3.6 Extract from Charles Booth's Inquiry into Life and Labour in London, 1886-1903.

3.28 In plan form, Regency terraces continued to follow the traditional 18th century layout with service areas located in the basement, principal reception rooms at ground and first floor, and rooms of decreasing importance across the upper floors. At the back of each house there was a long narrow yard extended to the stabling, the walls of which were sometimes treated with some architectural embellishments.

3.29 According to Charles Booth's survey, Gloucester Gate continued to be occupied by the wealthy upper-middle and upper classes until the end of the 19th century (Figure 3.6). By the 1930s the Survey of London stated that "In these houses... many changes have been made during the past 100 years, particularly in the kitchen offices which were originally always in the basement."

3.30 Plans and elevations of the properties along Gloucester Gate were included in the July 1938 edition of the Survey of London (Figure 3.7). The plans only show the first floor of the terrace and indicate the properties were in single residential occupation, with the principal reception rooms at first floor level. This use is indicated by the columns either side of the openings between the principal rooms in Nos. 1-4 and 8-11.

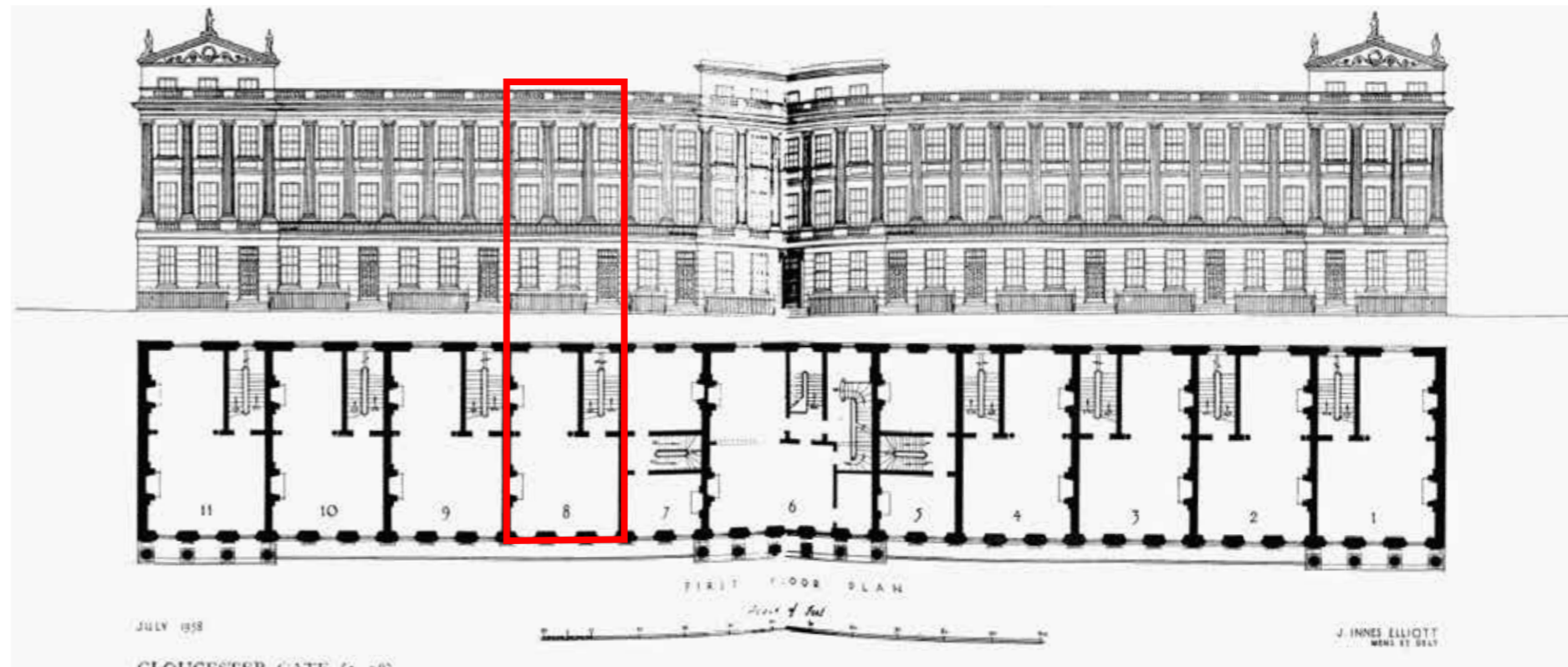


Figure 3.7 Plan and elevation of Gloucester Gate published in the Survey of London, 1938.

3.31 At some point during the mid-20th century, the majority of the houses on Gloucester Terrace were subdivided to create flats and maisonettes, resulting in substantial internal alterations. The London County Council bomb damage maps of 1939-1945 (not reproduced) indicates general blast damage to much of the terrace, including 8 Gloucester Gate, which presumably would have required some repair to fabric, even if not substantial.

3.32 During the 1970s and 1980s, Nos.1-11 Gloucester Gate were steadily restored and refurbished as a mixture of residential flats (Nos.1-4) and single family dwellings (Nos. 5-11).

8 GLOUCESTER GATE

EARLY HISTORY

- 3.33 8 Gloucester Gate is positioned to the north of the central property within the terrace and was built in c.1827 by Richard Mott to Nash's designs. The principal elevation is integrated into the overall composition of the terrace and is three bays wide, delineated by fluted ionic pilasters, over three principal storeys, plus basement and garret storey (see **Figure 1.1**). The principal entrance, approached by a short flight of steps spanning the basement lightwell, is positioned to the right of the elevation with a rectangular fan light above,
- 3.34 The first recorded occupant of 8 Gloucester Gate was one Mary Pares, who is recorded in the Rate-Books as having taken possession of the property by 1833. While of limited detail, Greenwood's 1830 map suggests that rear of the terrace was originally regular and uniform in appearance, with no evidence of closet wings or other rear extensions (see **Figure 3.4**).
- 3.35 There are no records of alterations to the house during the 19th century, but cartographic evidence and site survey investigations indicate some alterations to the property were made during this period.
- 3.36 The 1872 Ordnance Survey town plan (1:1056 scale) indicates a substantial extension to the rear of the building, extending the full length of the plot to abut the mews building, with a small yard or lightwell which presumably delineated the original building line (**Figure 3.8**). The irregular nature of these rear extensions and wings suggest that they were added on an ad hoc basis following the construction of the terrace. For example, surviving drawings from the Crown Estate archive indicate that 8 Gloucester Terrace (now Gloucester Gate) had been extended to the rear in c.1862. Unfortunately, no such drawings appear to have survived for No.8.
- 3.37 The 1895 Ordnance Survey map shows little change to the footprint of 8 Gloucester Gate, apart from a small addition to the rear lightwell (**Figure 3.9**).



Figure 3.8 Extract from Ordnance Survey 1872.

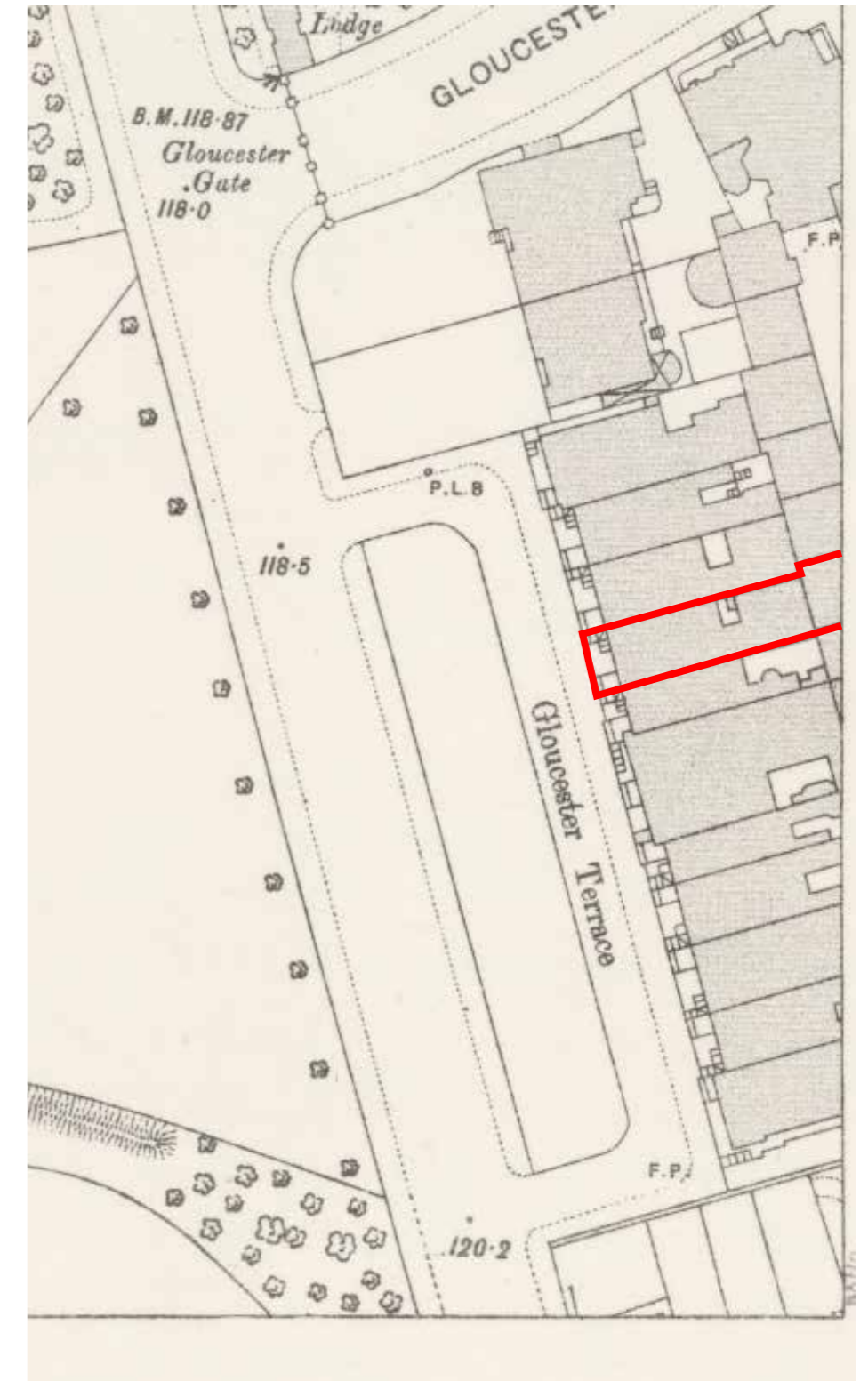


Figure 3.9 Extract from Ordnance Survey 1895.

EARLY 20TH CENTURY ALTERATIONS

3.38 The earliest plans for 8 Gloucester Gate date from the 1930s and comprise drainage plans showing the second and 'top' floor, produced by the Harvey Nicols Ltd. Decoration Department in 1937 (Figures 3.10–11), and the first floor plan produced in 1938 by the Survey of London (see Figure 3.6).

3.39 These plans indicate the property was still in use as a single-family dwelling. The first floor comprised two principal rooms, each heated by a fireplace on the north side, with a large opening between them marked by columns. The principal staircase was enclosed and located to the rear of the property on the south side.

3.40 The second floor, accessed via the principal staircase, consisted of a large front and rear room, used as a bedroom and lounge respectively, which were accessed separately from the landing. This floor also had a partitioned bathroom adjacent to the bedroom at the front of the property and a secondary staircase up to the top, or garret, storey leading off the landing. A second w.c. was located off the principal staircase.

3.41 The top floor, historically, comprised lower-status accommodation and was accessed from the secondary staircase on the south side of the property. The 1937 plan shows the two principal rooms at this level comprised a bedroom to the front and dining room to the rear, both served by chimney stacks on the north side but with no fireplaces indicated. A 'Maid's Bedroom' adjoined the larger bedroom to the front of the property while a kitchen and partitioned w.c. adjoined the dining room to the rear. All rooms were accessed from the landing on the south side of the property.

3.42 While not comprehensive, these plans are a useful and indicate that the internal planform of the main house at 8 Gloucester Gate appears to have remained relatively intact by this time. These plans also suggest that the rear extension, or wing, shown in Ordnance Survey maps from this period did not extend above the ground floor.

3.43 An aerial photograph from 1946 indicates that the top floor was, by this time at least, illuminated by a dormered rooflight inserted into the rear slope of the pitched range over the front part of the house (Figure 3.12). It is unclear when this dormer was inserted and it is not referenced in the third floor plan from 1937.

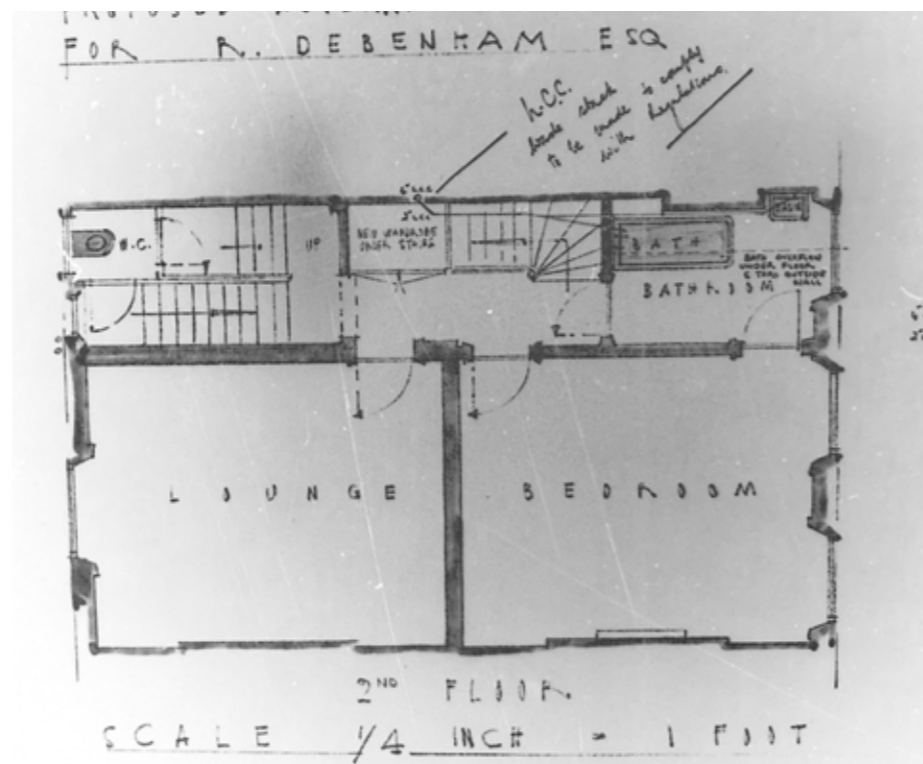


Figure 3.10 Plan of second floor of 8 Gloucester Gate, 1937.

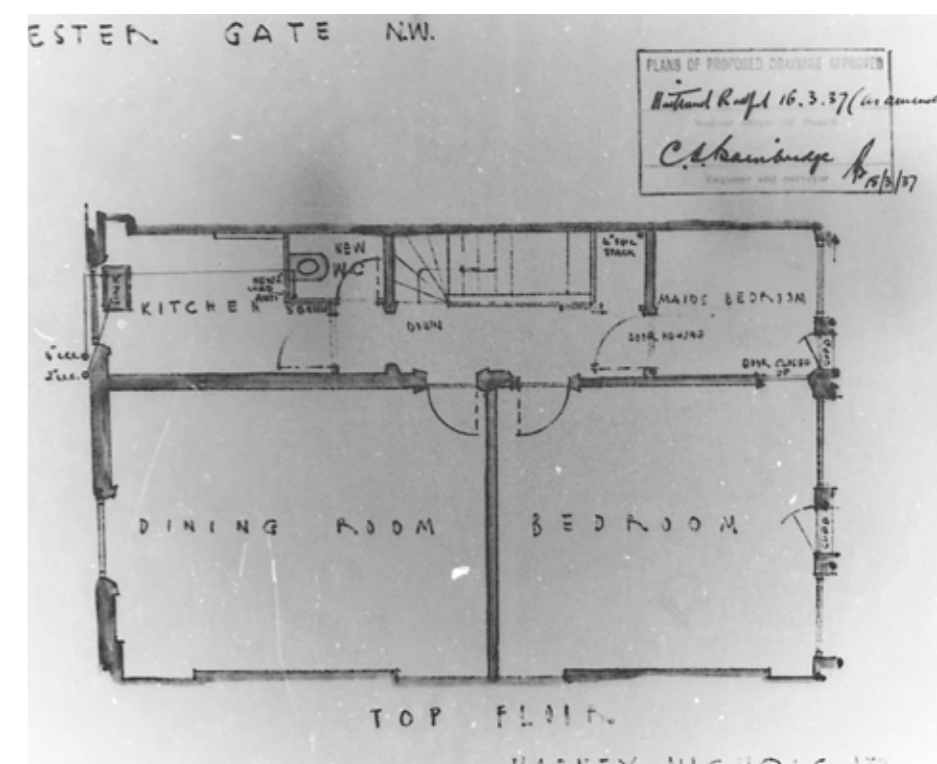


Figure 3.11 Plan of third floor of 8 Gloucester Gate, 1937



Figure 3.12 Aerial photograph of Gloucester Gate, 1946.

- 3.44 Between 1938 and the early 1960s, documentary evidence held by the Crown Estate Archive indicate that the majority of the properties along the terrace were adapted for multiple occupancy as flats or maisonnettes, and were let by the Crown Estate on leases of differing lengths.
- 3.45 A set of drainage plans produced by architect Frank Scarlett in 1950 only show parts of the second and third floor (Figure 3.13). However, they indicate further changes to the interior plan as the bathroom at second floor level had been repurposed as a kitchen while the maid's bedroom at third floor level had been converted for use as a bathroom.
- 3.46 By 1963 none of the properties along Gloucester Gate were in occupation as single residences. An investigation into the occupancy of the premises along Gloucester Gate in 1966 reveals that No.8 had been subdivided by this time into a basement flat, mews flat and two maisonnettes, and was sub-let and occupied as follows:
- Basement flat: sub-let to Mr. Redding*
 - Ground and first floor maisonette: sub-let to four medical students*
 - Second and third floor maisonette: sub-let to Mr P. Wheeler.*
 - Mews flat: Sub-let to Mrs. Garrick.*
- (Deputy Commissioner (Town), October 1966)
- 3.47 The subdivision of the building during the mid-20th century to accommodate four separate residential units is likely to have required considerable reconfiguration.
- 3.48 Unfortunately, no comprehensive plans survive to indicate the full extent of the subdivision. However, it is highly likely that provision for bathroom and kitchen facilities would have been made across each floor resulting in alterations to the plan form and historic fabric.

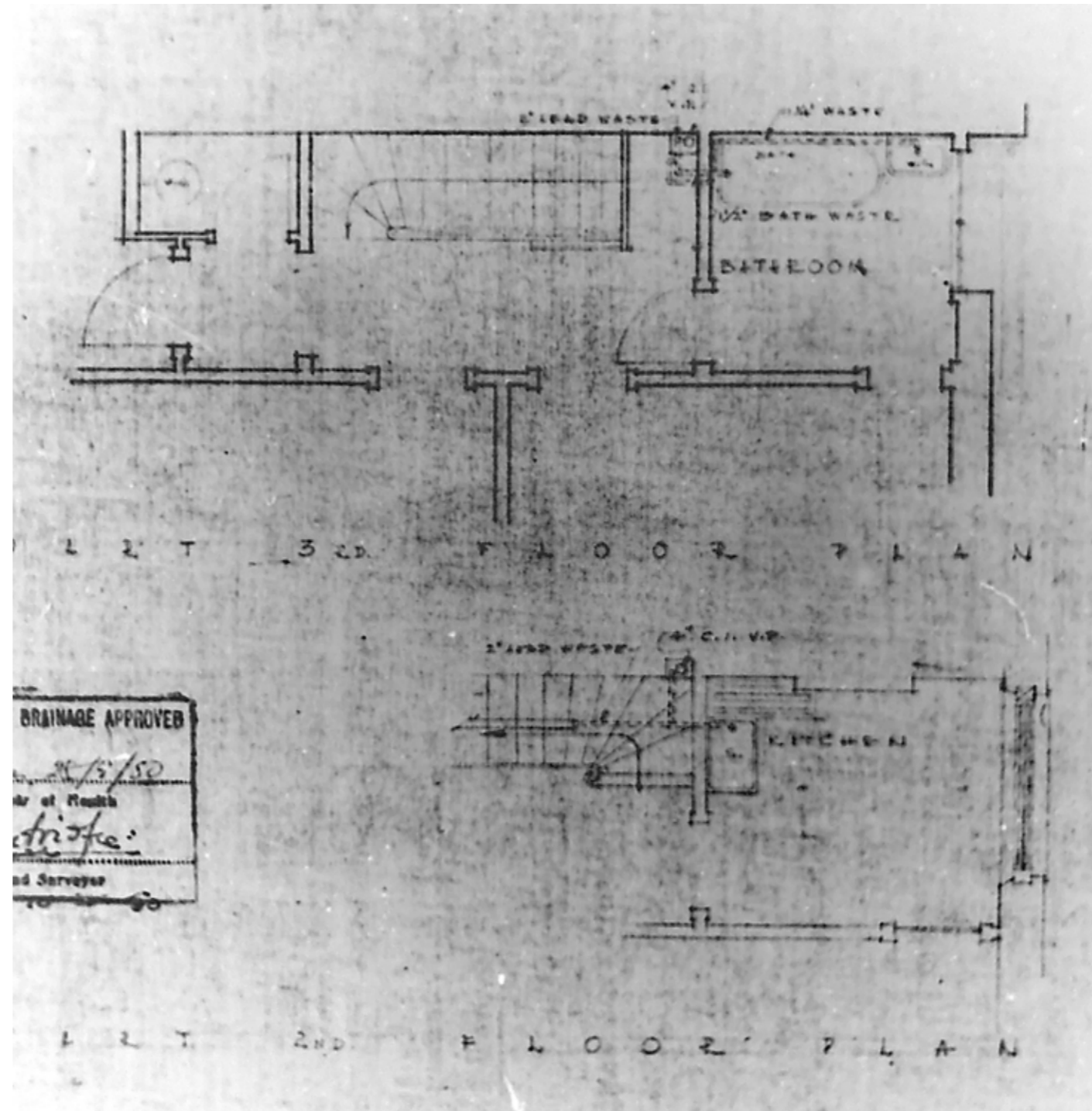


Figure 3.13 Plan showing part second and part top (third) floor of 8 Gloucester Gate.

REFURBISHMENT IN THE 1980S

3.49 The terrace at 2–11 Gloucester Gate was listed Grade I in 1974. No further development proposals for the Site are recorded until 1981, when permission was granted for the alteration and refurbishment of Nos. 5–11 Gloucester Gate and their associated mews buildings by R. Seifert and Partners to form flats. However, according to documents held in the Crown Estate archive, the plans were subsequently abandoned due to the costs involved with refurbishing the listed buildings.

3.50 The 'existing' drawings submitted with the 1981 application provide the first comprehensive survey of the interior of 8 Gloucester Gate (Figures 3.14–3.19). The survey drawings indicate that the main volume of the rear extension shown in the Ordnance Survey maps was at lower ground floor level and that there was a smaller two-storey projecting wing above.

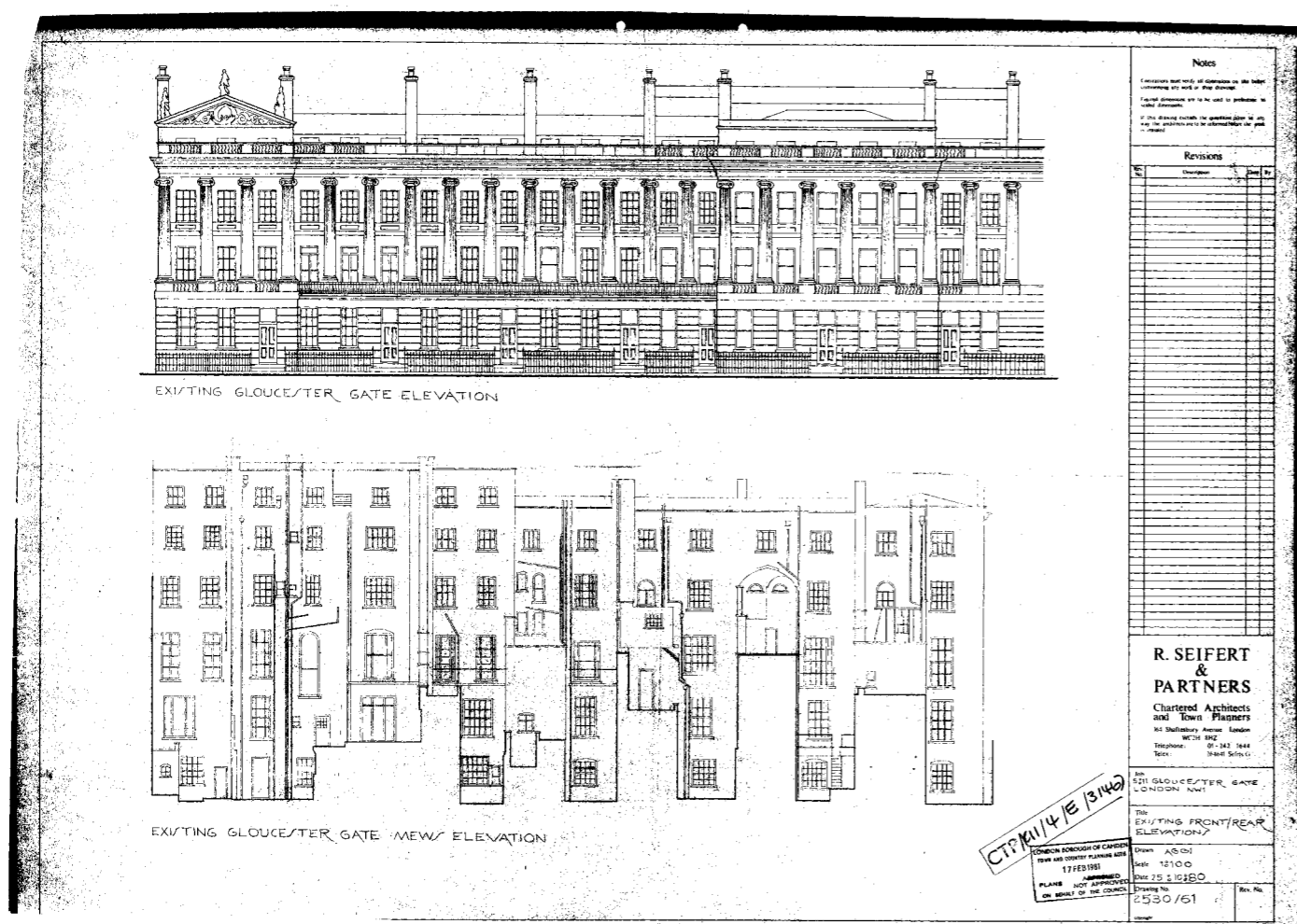


Figure 3.14 Survey drawing of external elevations at 8 Gloucester Gate, 1981.

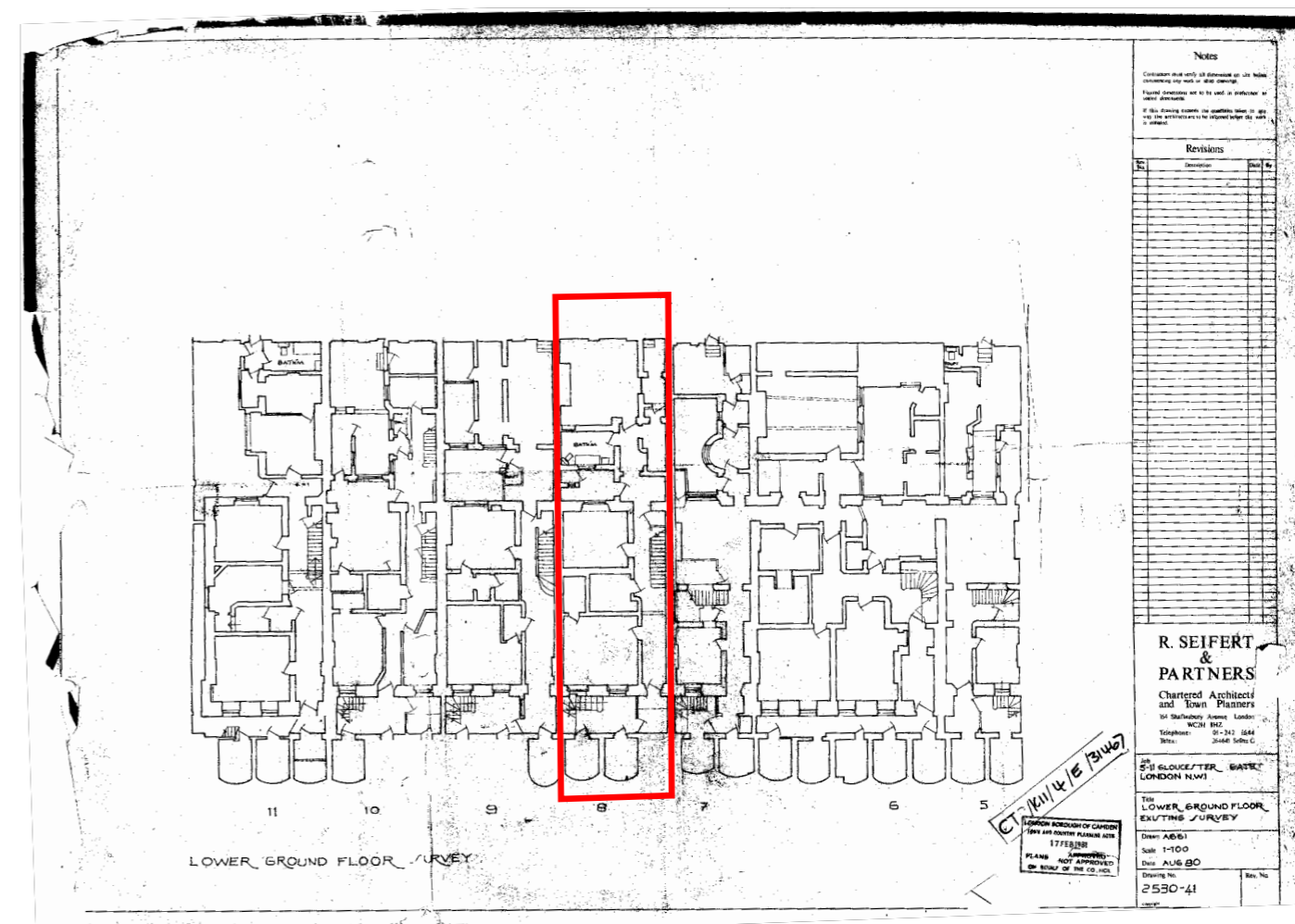


Figure 3.15 Survey drawing of basement at 8 Gloucester Gate, 1981.

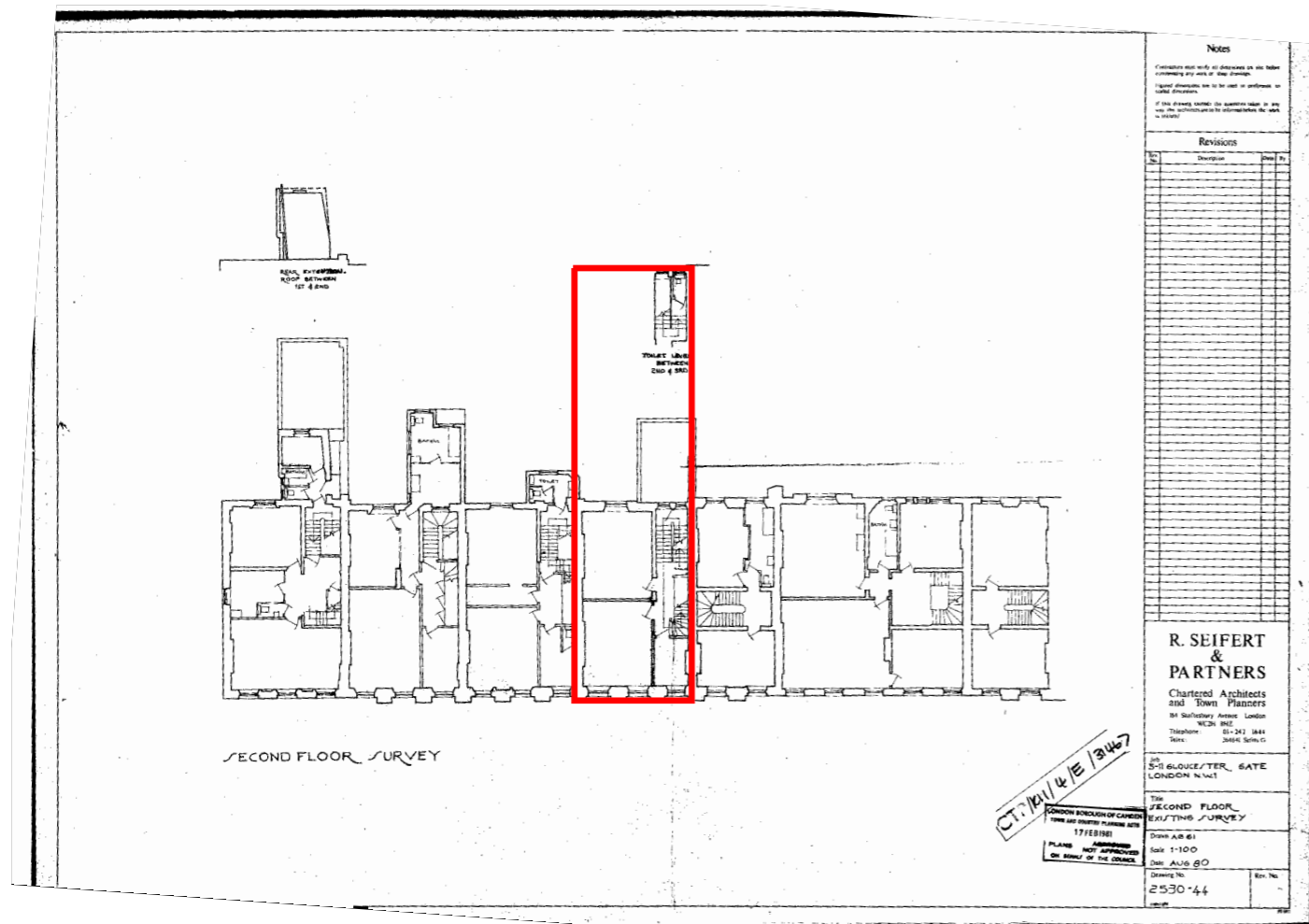


Figure 3.18 Survey drawing of second floor at 8 Gloucester Gate, 1981.

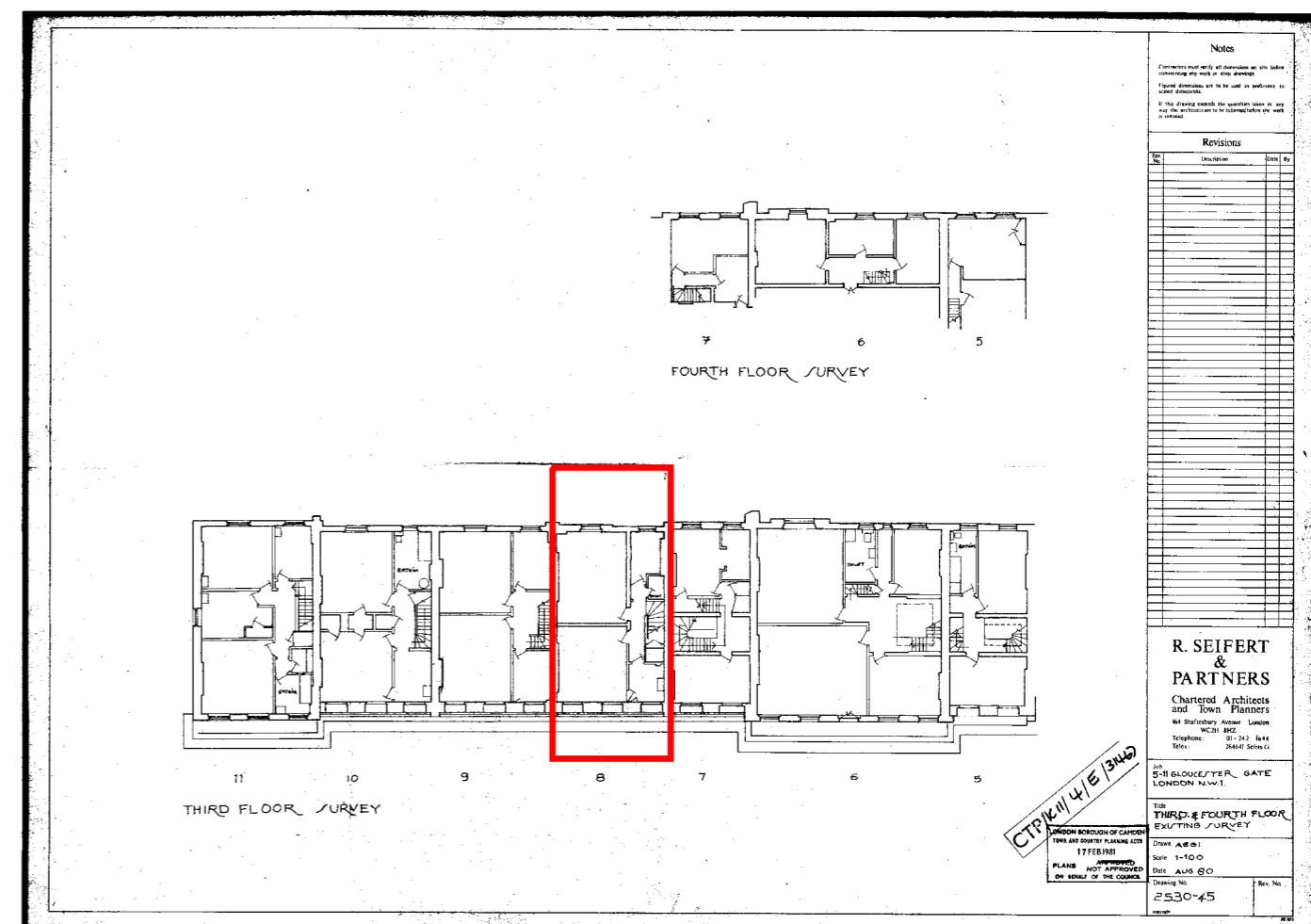


Figure 3.19 Survey drawing of third floor at 8 Gloucester Gate, 1981.

3.51 Inside, parts of the original planform were still legible by the 1980s. However, there are two notable deviations from the 1938 plan produced by the Survey of London. First, was the apparent re-positioning of the staircase from ground to first floor between the front and rear principal rooms, which mirrored that of the neighbouring property at No.7 where the narrower width of the property had necessitated a different staircase treatment. However, it is likely this staircase was added during the mid-20th century, when the building was subdivided into flats and maisonettes, and was not an original feature of the house. Second, the first floor principal front room

appears to have been subdivided to form two smaller rooms. This too appears to have been dictated by the re-positioning of the staircase.

3.52 In 1987 permission was granted for external and internal alterations to Nos. 5, 7, 8 and 9 including the demolition of the existing rear extensions to nos.8 and 9 (LPA reference: 88770103). The approved drawings by Carden & Godfrey Architects reveal how the properties were refurbished and restored to single family dwellings, which at the time was considered to be more viable than conversion to flats (Figures 3.20-3.23).

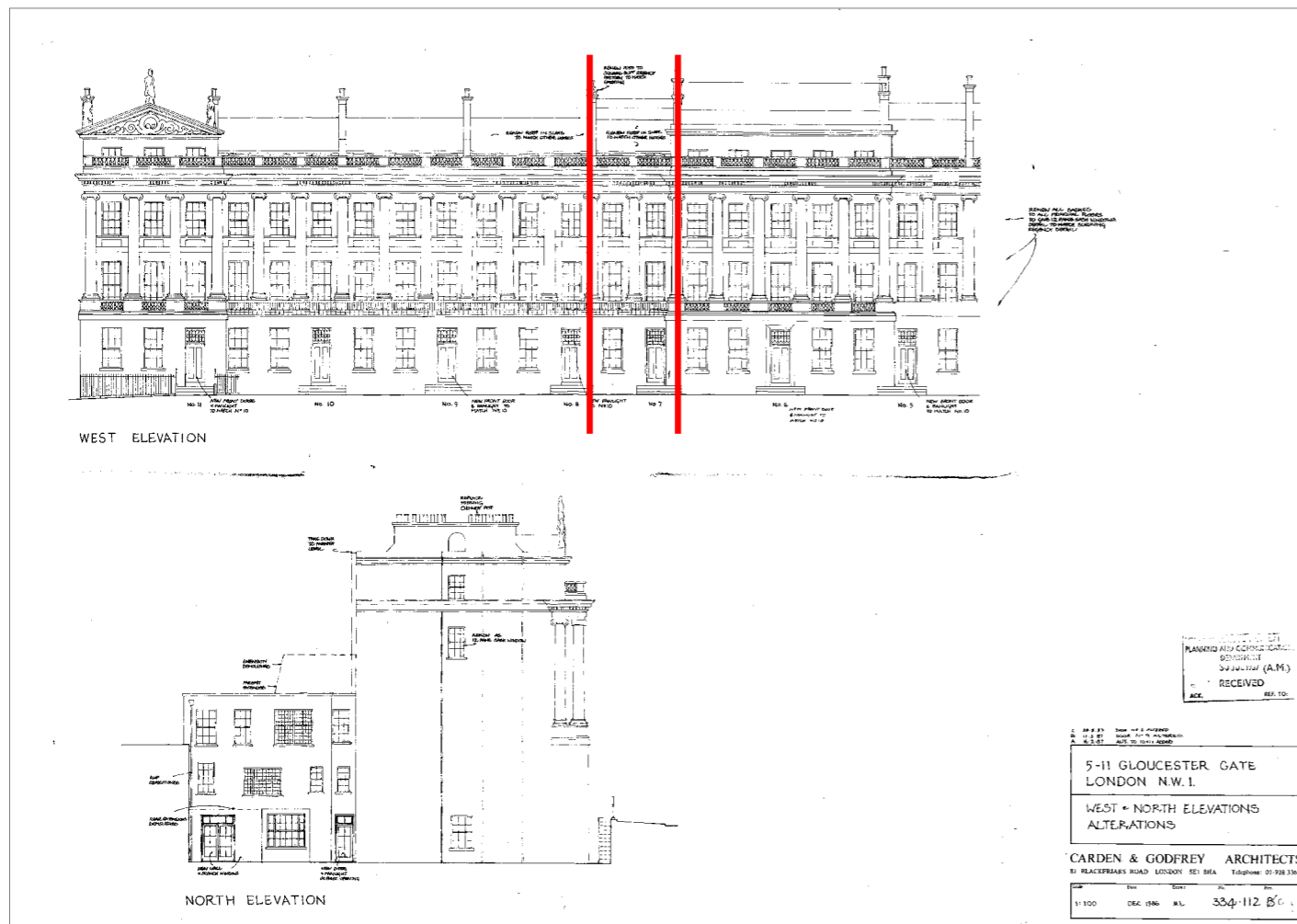


Figure 3.20 Consented plans for principal elevation at 8 Gloucester Gate, 1987.

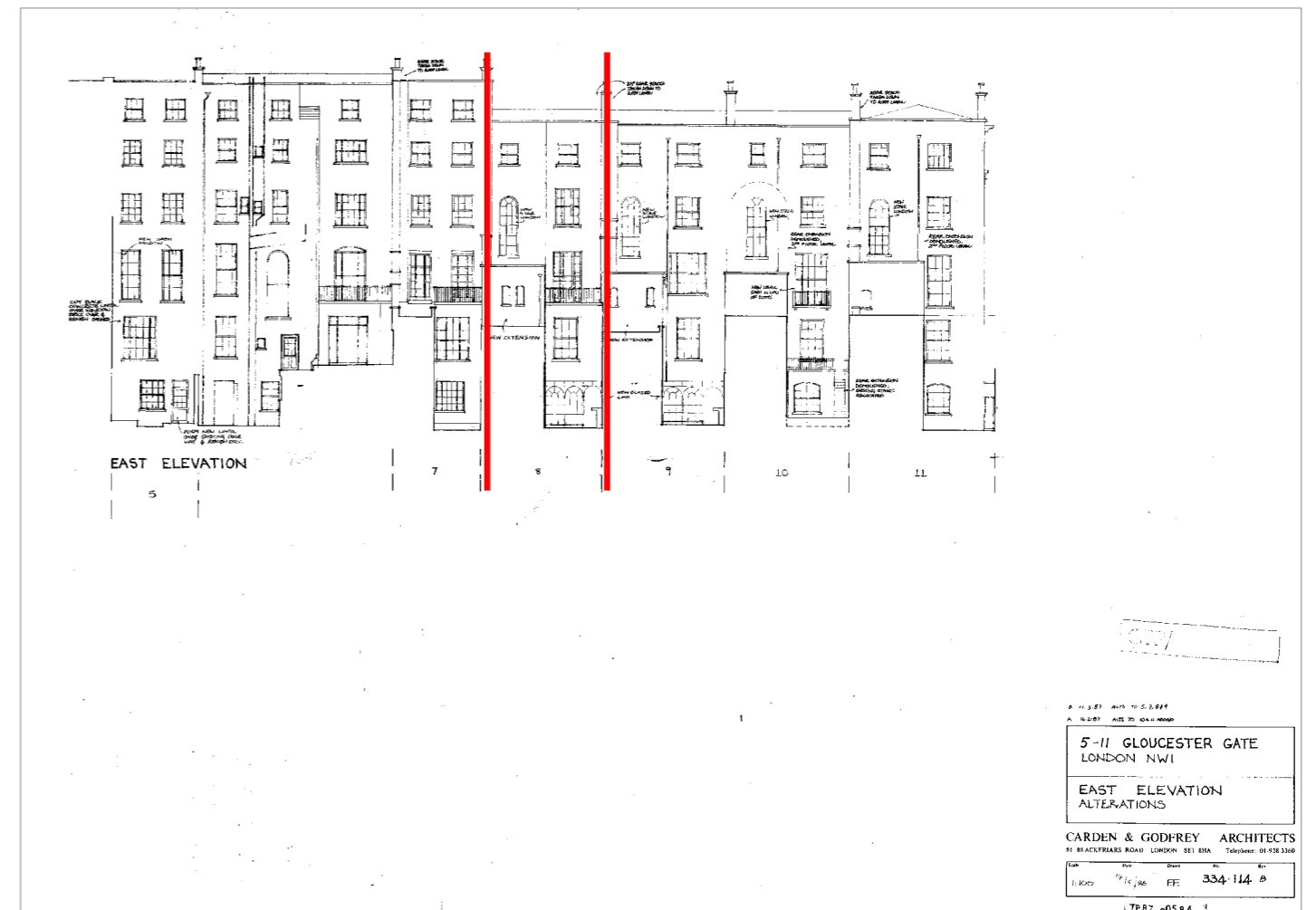


Figure 3.21 Consented plans for rear elevation at 8 Gloucester Gate, 1987.

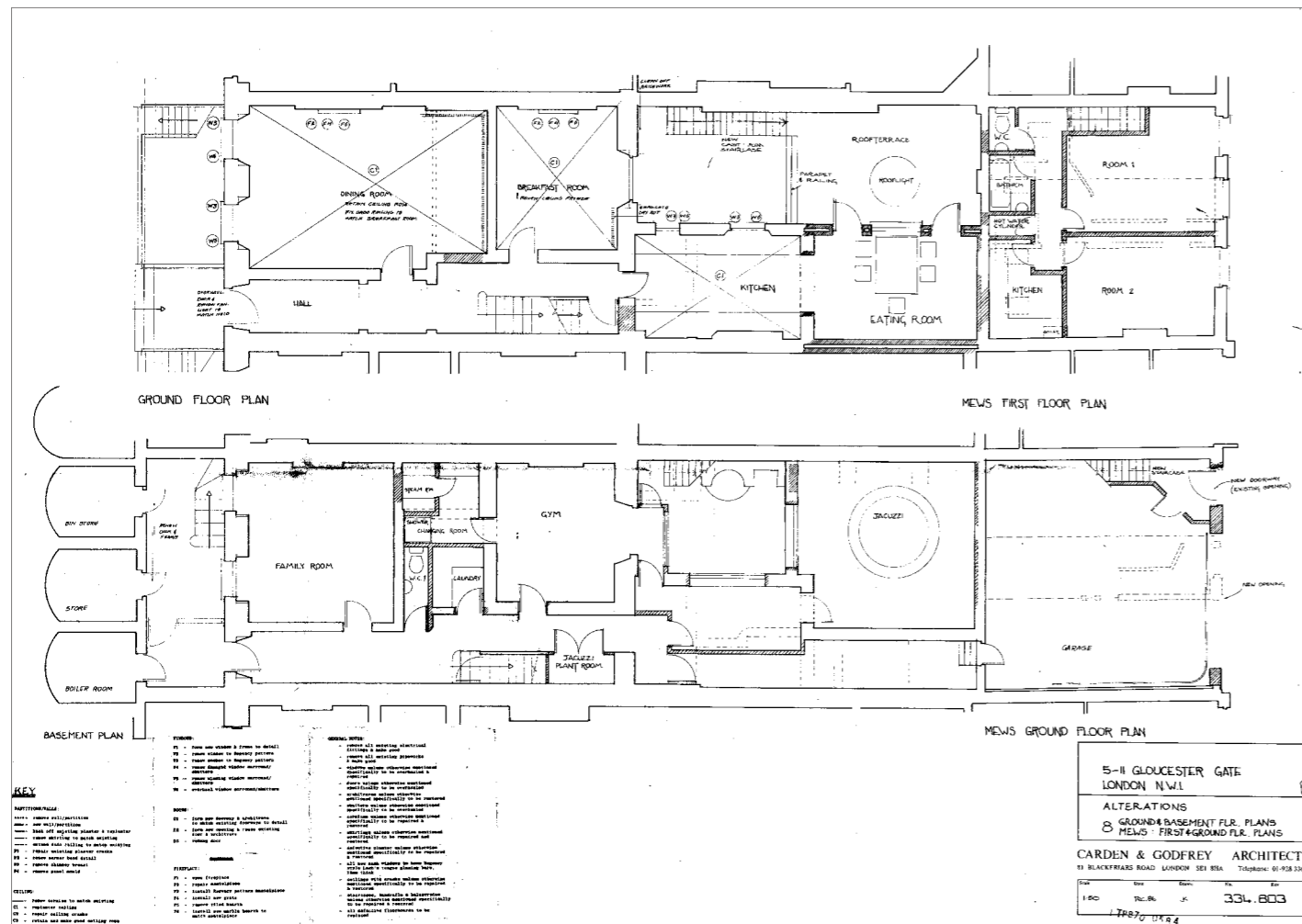


Figure 3.22 Consented plans for basement and ground floor at 8 Gloucester Gate, 1987.

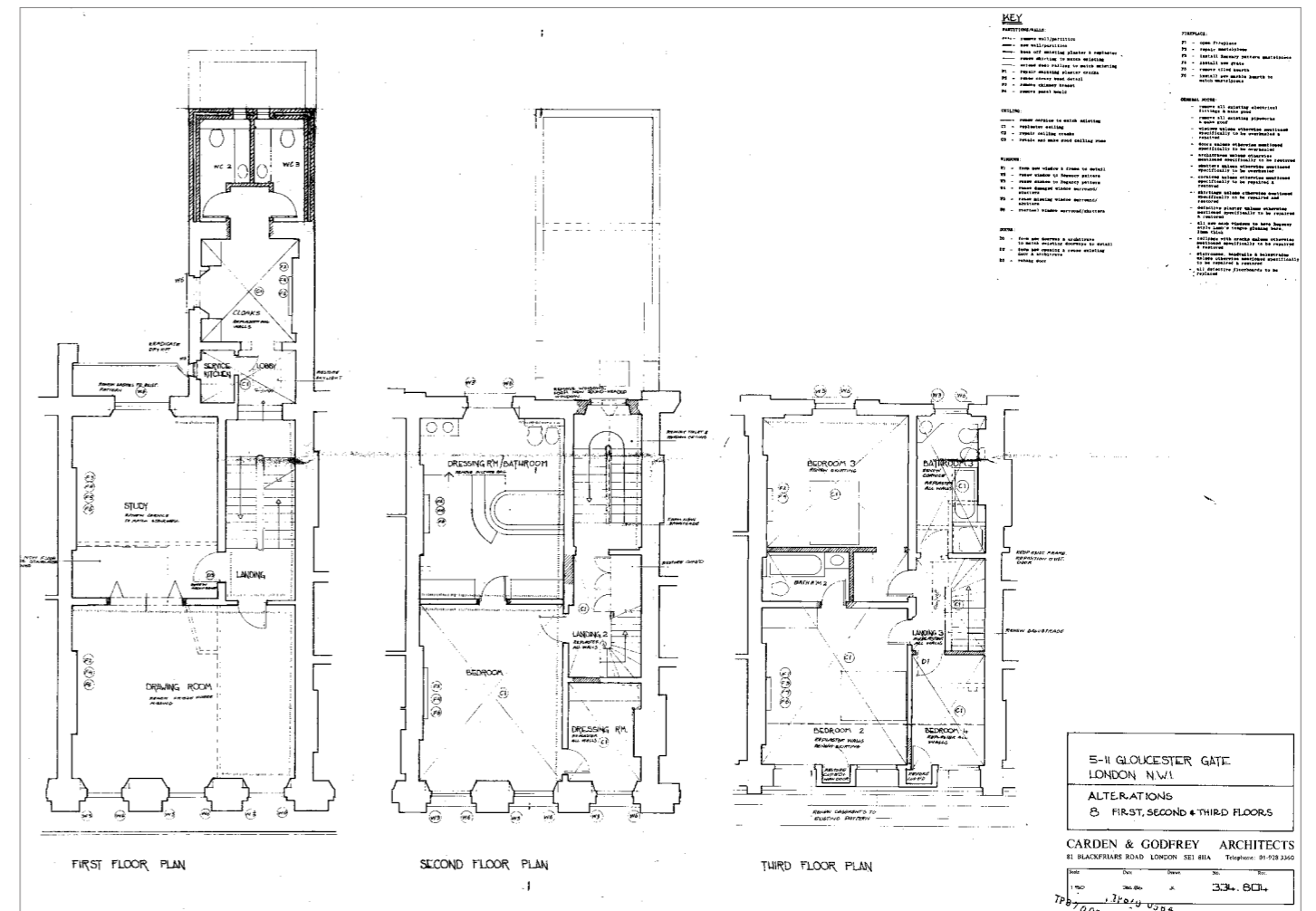


Figure 3.23 Consented plans for first, second and third floors at 8 Gloucester Gate, 1987.

- 3.53 Externally, on the principal elevation a new fanlight was installed above the entrance door, all windows were renewed with 12-pane sashes, and the roof and chimney pots were also renewed in a typical Regency style. The rear elevation was regularised through the reinstatement of new facsimile windows, including the tall and arched headed stair window at second floor level, as well as the reconfiguration of the rear wing and insertion of a lower ground floor glazed link.
- 3.54 It is notable that the 1987 consent included plans to build out the existing two-storey rear wing. At ground floor it was proposed to extend a ground floor dining room up to the party wall of the mews house. A new external terrace area was also proposed at ground floor overlooking the lightwell at lower ground floor level, which was to be accessed by a new external cast iron staircase. At first floor the rear wing was also extended, albeit to a lesser extent, to accommodate two W.C.s.
- 3.55 Another notable alteration implemented as part of the 1987 scheme was the removal of the mid-20th century staircase and reinstatement of the historic proportions of the front and rear principal rooms at ground and first floor levels. At ground floor the principal staircase was also reinstated to its original position on the south side of the house.
- 3.56 Throughout the interior, partitions were reconfigured and doorways infilled to reinstate a more appropriate planform. All electrical fittings and pipework were removed; existing window surrounds and shutters, doors and architraves were overhauled; and all plasterwork, metalwork and joinery was either repaired or renewed. The new sash windows had 15mm thick Regency style Lamb's tongue glazing bars.
- 3.57 On site investigations have revealed that there is some discrepancies between the consented plans and what was eventually built. The rear wing does not extend to abut the mews building at ground floor level and the internal configuration at first floor is also different to that shown in the consented plans. Within the main volume of the building, the configuration of the planform at second and third floors are also different from what is shown in the consented plans.
- 3.58 Despite these deviations, the present condition of 8 Gloucester Gate is largely the result of the 1987 refurbishment and there have been no further recorded alterations to the building.

GLOUCESTER GATE MEWS

- 3.59 The mews building is likely to have been constructed between c.1827 and 1835. Many of the early maps of Regent's Park are not detailed enough to show the mews, however Mayhew's 1835 survey does indicate a thin strip of terraced development positioned between the rear of the Gloucester Gate buildings and buildings fronting Clarence Street (now Albany Street) (Figure 3.24).

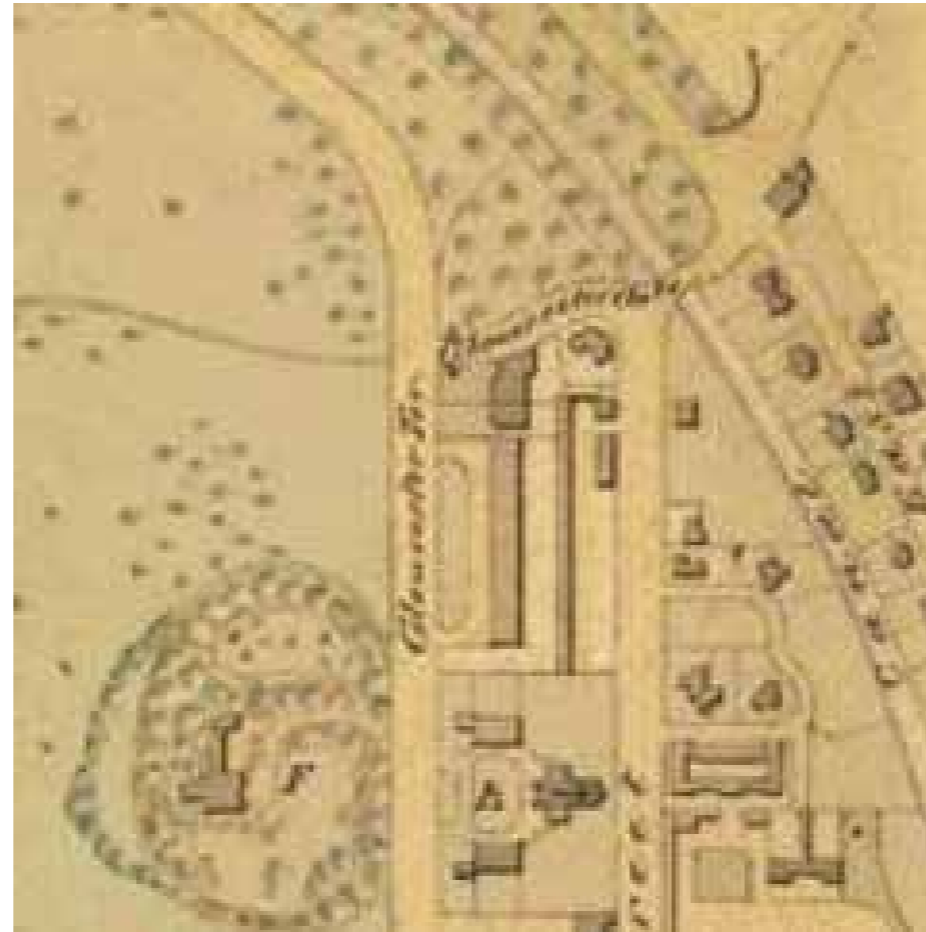


Figure 3.24 Extract from Charles Mayhew's Plans of all the Ground, Houses and other Buildings within the Jurisdiction of the Commissioners for Paving the Regent's Park, Regent's Street, Whitehall, &c. from an actual survey made in the years 1834 and 1835.

- 3.60 Of particular note, the western elevation of the Gloucester Gate Mews is unusual in its architectural form and detailing, and features a blind arcade which extends behind all the houses along the northern part of the terrace. This is an original element of the mews design but has been subject to alteration since the mid-nineteenth century. For example, there is evidence of infill between the arches.
- 3.61 From the planning history and site inspection it is clear that the interior of the mews building have been substantially altered in the late 20th century (Figure 3.25). The front elevation has been remodelled and the partitions of the first floor are plasterboard. As a result, there are no longer any architectural features of interest. There may be, however, remnants of historic roof timbers in the attic.

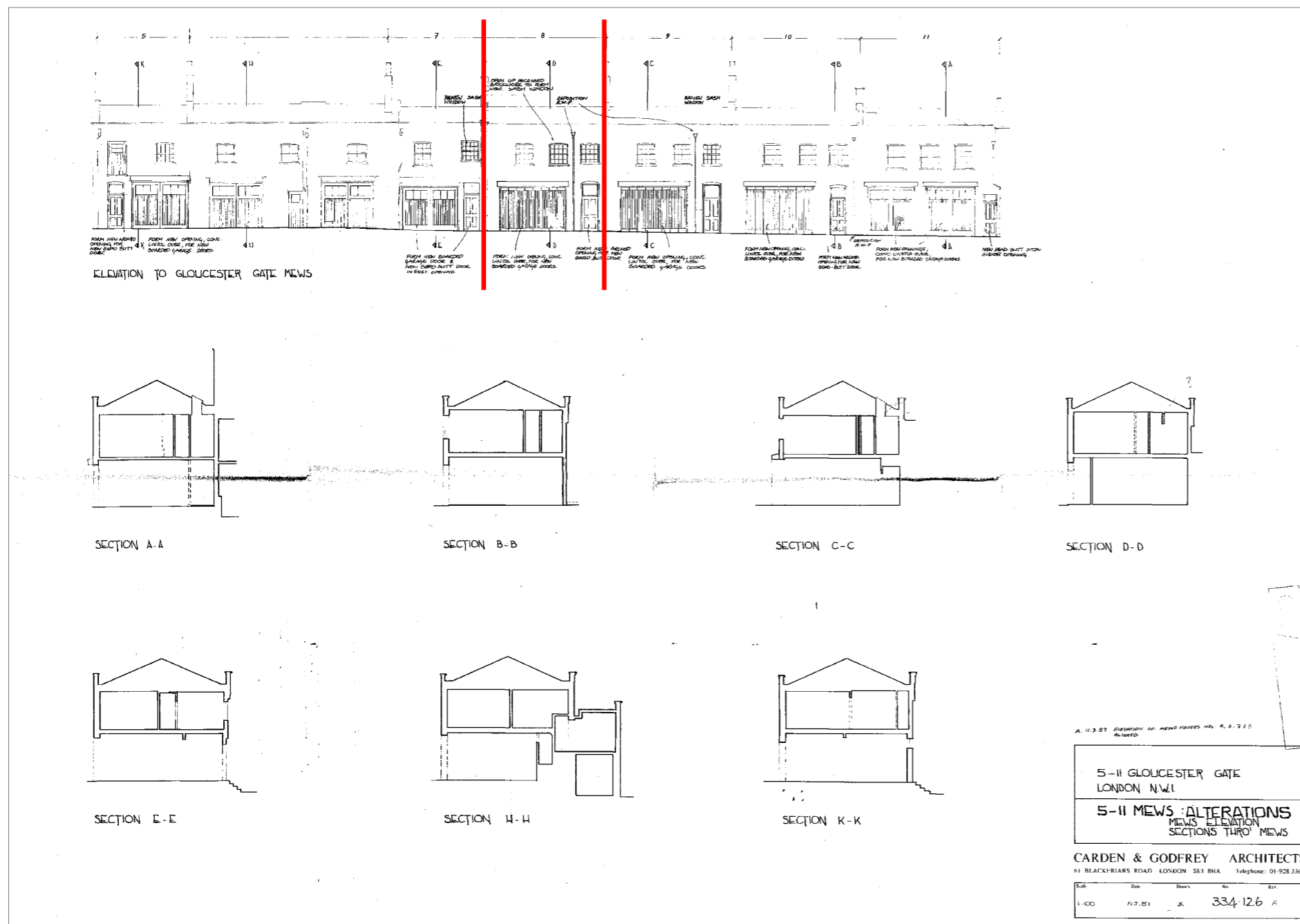


Figure 3.25 Consented plans for works to exterior of the mews house, 1987.

4.0

ASSESSMENT OF SIGNIFICANCE

8 GLOUCESTER GATE, REGENT'S PARK, LONDON, NW14HG

ASSESSMENT OF SIGNIFICANCE

- 4.1 This section of the report assesses the significance of 8 Gloucester Gate and the Regent’s Park Conservation Area.
- 4.2 The NPPF forms the basis for our assessment of the significance of the site. **Paragraph 200** of the National Planning Policy Framework requires applicants to describe the significance of any heritage assets likely to be affected by development proposals.⁷ The paragraph states that *“the level of detail should be proportionate to an asset’s importance and no more than is sufficient to understand the potential impact of the proposal”*.
- 4.3 Significance is defined in Annex 2 of the NPPF as:
The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.
- 4.4 The significance of a heritage asset is usually derived from a mix of these types of interest, and is a relative value that depends upon the type of building: so ‘high significance’, which might apply to a Georgian townhouse, does not necessarily mean that it is as significant as, for example, the west front of a medieval cathedral.
- 4.5 Equally, the statutory listing of buildings/structures means that the preservation or enhancement of their special interest attracts great important and weight in the determination of planning applications.

- 4.6 Understanding significance helps owners and others responsible for managing a heritage asset to repair, maintain and develop it in a way that preserves, enhances or better reveals its special interest, character or cultural value. Analysis of the relative significance of different parts of a site can help designers arrive at the most appropriate proposals by identifying parts that can sustain a greater or lesser degree of intervention—those that can be changed without harm to significance, and those that are more sensitive and should not be changed.

8 GLOUCESTER GATE

- 4.7 8 Gloucester Gate is a four-storey first-rate townhouse which forms part of a terrace of townhouses built in 1826–28 as part of the last phase of John Nash’s development of the Regent’s Park Estate. Together, the houses that comprise Gloucester Gate form a prominent architectural composition and townscape grouping that is, in some respects, greater than the sum of its individual parts.
- 4.8 8 Gloucester Gate is listed Grade I and is, therefore, of ‘exceptional interest’. Below we consider the significance of 8 Gloucester Gate, which resides principally in its historic and architectural interest as defined in the NPPF.

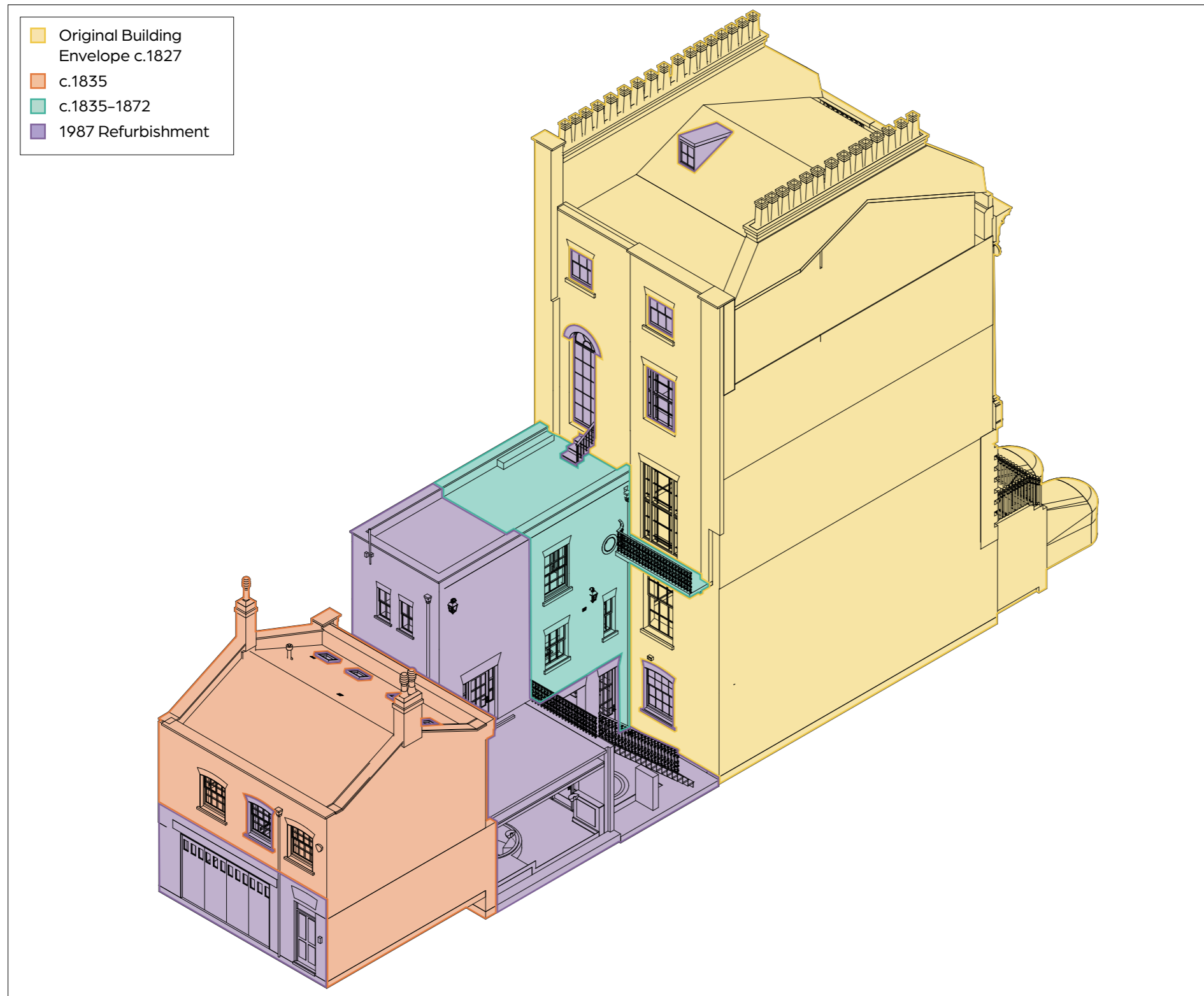
HISTORIC INTEREST

4.9 **Table 4.1** identifies the main building phases across the Application Site.

PHASE	DATE RANGE	WORKS UNDERTAKEN
Phase I	c. 1827	Building constructed.
Phase II	c.1827–1835	Construction of the mews/stables building to the rear.
Phase III	c.1827–1872	Construction of the closet wing.
Phase IV	1938–1963	Ad hoc alterations to the interiors. Subdivision into flats and maisonettes. Insertion of staircase between ground and first floors between the two principal rooms.
Phase V	1987	Refurbishment of No.8 and reinstatement as a single-family dwelling. Extension of rear closet wing. Replacement of windows. Alteration to plan form across all floors. Complete refurbishment of the mews building including alteration to ground floor openings and internal planform.

Table 4.9 Construction and alteration phases to 8 Gloucester Gate and 8 Gloucester Gate Mews

⁷ We have also paid regard to English Heritage’s Conservation Principles, Policies and Guidance (2008), which sets out current good practice for assessing the significance of historic buildings in England and is derived from the Burra Charter of 1979, and Historic England’s GPA2 (2015), which provides further guidance on managing the significance of heritage assets.



- 4.10 The historic interest of 8 Gloucester Gate is principally derived from its origins as part of the ambitious development of the Regent's Park Estate and its associations with John Nash, the prominent Regency architect. As we have described above, Nash was responsible for the comprehensive redevelopment of the area from Regent's Park to St James's Park, Whitehall and the Strand. The Site survives within its broader context, which is defined by its relationship to Regent's Park and other contemporaneous terraces located around the Outer Circle.
- 4.11 The historic interest of 8 Gloucester Gate is manifest principally through the original external form and elevations of the building, its relationship with the wider terrace at 2-11 Gloucester Gate, and remnants of the historic internal planform.
- 4.12 Internally, remnants of early-19th century fabric still survive in places, despite successive phases of alteration, and additional fabric may remain beneath more recent fixtures and fittings. Any remnants of original fabric are considered to be of high historic significance. However, the overall extent of the original fabric is relatively limited and has been subject to extensive refurbishment and, in some cases, alteration.
- 4.13 Later phases of alteration, dating from the late-19th and early-20th centuries, took the form of ad hoc alterations to the planform and rear. While they are reflective of the evolving nature of the house during this period, the historic interest of these later phases is of secondary significance, and much of the fabric from this period was removed during the 1980s.
- 4.14 The 1980s refurbishment, which remodelled the rear of the house and reinstated much of the traditional detailing and planform to the principal rooms, has largely established the present character and appearance of 8 Gloucester Gate. This phase comprised a wholesale remodelling, incorporating a late-20th century interpretation of Regency architectural style. While this refurbishment has reinstated much of the Regency character of the property the fabric itself, comprising fenestration, fixtures, and fittings, is of limited historic interest.
- 4.15 Overall, the **historic interest** of 8 Gloucester Gate is **high**.

ARCHITECTURAL INTEREST

4.16 8 Gloucester Gate is a prominent example of a late-Regency 'First rate' townhouse, purpose built for the wealthy upper classes of Georgian society. Its original design, form and materiality were a material reflection of both fashionable taste and the standardisation of house building regulations in London following the Building Act of 1774. However, the extent of internal alterations since its construction has reduced its architectural interest to a degree.

EXTERIOR

4.17 The architectural value of 8 Gloucester Gate derives principally from its principal elevation and the high-quality design and materials of this element. The elevation of the site constitutes a single component within the wider Gloucester Gate façade, which, although formed of 11 separate properties, reads as a single entity and conveys the impression of a larger, grander building, of palatial proportions.

4.18 The building survives as a fine example of 'First Rate' classical architecture, and displays the symmetry, grandeur and classical detailing associated with houses of this type. The sophisticated use of stucco and rustication similarly reflects the status of the Regency terrace property.

4.19 The rear elevation of 8 Gloucester Gate, originally conceived as a secondary element, is of secondary architectural interest. Alterations over the course of the 19th and 20th centuries have further eroded its value. This is evident where the closet wing was built during the mid-19th century, and which obscured the proportions of the host building and the arcade to the rear of the mews building.

4.20 The closet wing has lesser architectural value, as a domestic wing addition. It reflects the style and fashions of the period as the original buildings on Gloucester Gate were adapted to meet the need for ancillary accommodation. In the case of No. 8, the closet wing has been altered over time including its extension to the north. The current appearance does not have any architectural distinction; it is a utilitarian addition of a secondary nature that was commonly applied to Georgian, Regency and Victorian townhouses in London.

4.21 Overall, the mid-18th century character and external appearance of the building is considered to be of high **architectural interest**.



Figure 4.1 Principal elevation of 8 Gloucester Gate.



Figure 4.2 Rear elevation of 8 Gloucester Gate.

INTERIOR

4.22 A small number of architectural features are original and therefore make a particular contribution to the special interest of the building. These comprise:

- 4.22.1 The original main staircase rising from first to second floor (historic plans from the 1980s suggest the ground to first floor flight of the staircase was reinstated at that time);
- 4.22.2 surviving decorative plasterwork – albeit the majority are likely to have either been reapplied or altered as the building was changed over the course of the last c200 years; and
- 4.22.3 elements of the planform, including the proportions of the principal rooms at ground and first floor which appear to have been reinstated and restored during the 1987 refurbishment.

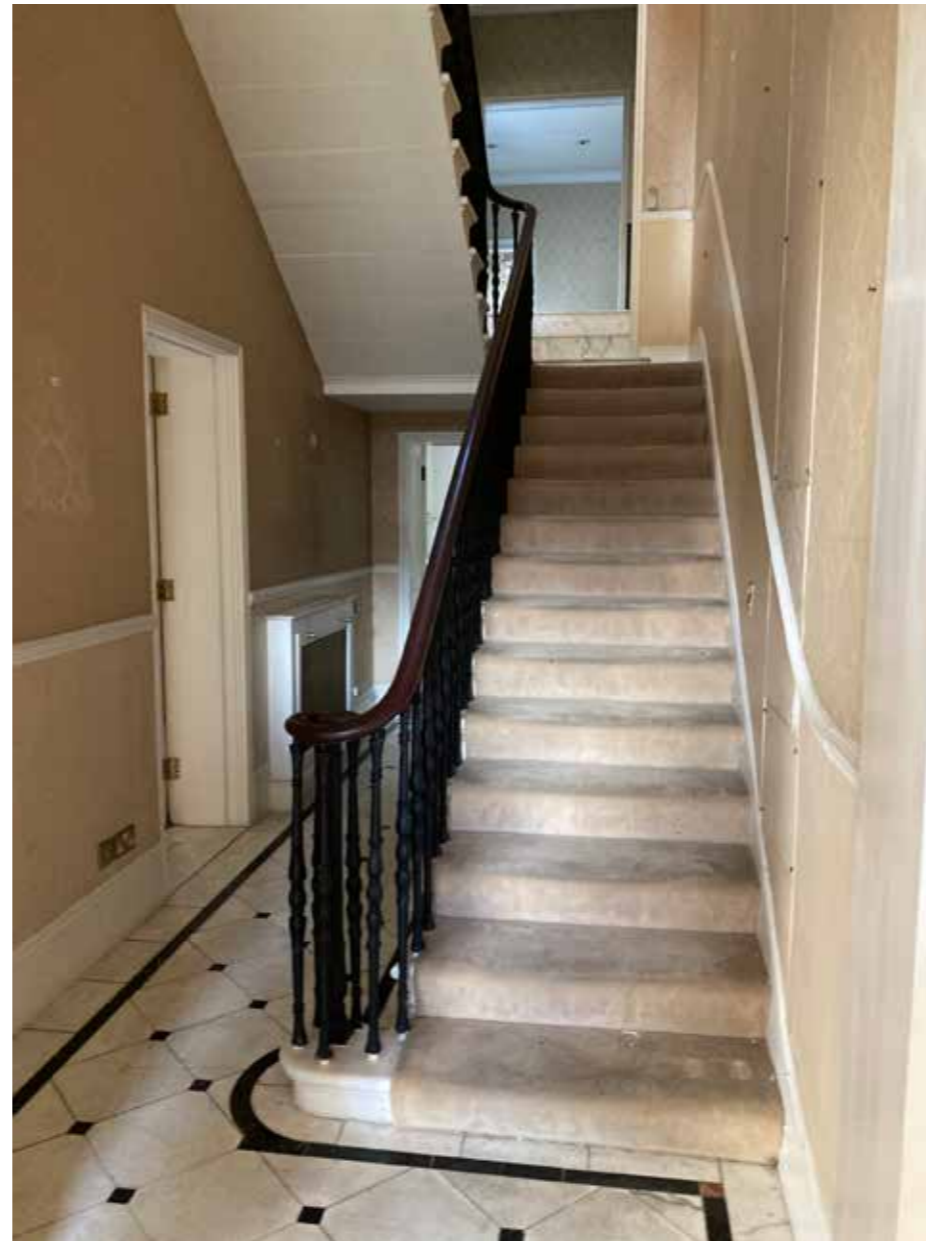


Figure 4.3 Reinstated principal staircase at ground floor.



Figure 4.4 Ground floor principal room reinstated to its historic proportions.



Figure 4.5 Original principal staircase at first floor level.



Figure 4.6 Staircase to second floor landing.



Figure 4.7 Front room at third floor level (attic storey).

4.23 With reference to architectural detailing, the survival of cornices in the ground and first floors is good. The cornice in the front room on the ground floor is indicative of the quality of the original interiors. These more elaborate architectural features reflect the status and hierarchy of the different spaces, in the usual way, and materially contribute to the special interest of the building. These elements will be preserved in the proposals and repaired on a like-for-like basis to enhance this aspect of the listed building.

4.24 It is clear that in some areas (ground floor hall and second floor hall) the corning is modern and while redolent of the original design, is most likely part of the 1987 refurbishment and is poorly applied in places. Similar approaches have been taken with the door and window joinery throughout the building and the reinstatement of the principal staircase from ground to first floor.

4.25 Much of the late- 20th century fabric relating to the building's refurbishment as a single-family dwelling is of limited architectural interest and is either neutral or actively detracts from the historic character and architectural significance of the listed building. This is particularly the case in the lower ground floor, and in the area within the mews.

4.26 Throughout the building, much of the late-20th century interior decoration attempts to replicate the style of the Regency period. However, in most cases this looks superimposed and is of ordinary quality. As such, the majority of fixtures and fittings are of limited architectural interest and make little contribution to the significance of the listed building.

4.27 Other later alterations that have compromised the architectural interest of the interiors include:

4.27.1 Extension of the building line at the rear of the lower ground floor;

4.27.2 Alterations to the planform on the lower ground, ground, second and third floors through insertion of modern plasterboard partitions;

4.27.3 Removal of interior fabric from the closet wing;

4.27.4 Installation of bathrooms at second and third floor; and

4.27.5 Insertion of modern joinery, fixtures and fittings.

4.28 Due to the extent of modern alterations throughout the building, the interior has been considerably compromised and its architectural interest is considered to be moderate.

4.29 The removal of this later intrusive fabric, and reinstating original forms, would undoubtedly enhance the significance of the building.



Figure 4.8 Cornice detailing at first floor level.



Figure 4.9 Windows to principal front room at first floor level.

SETTING

- 4.30 The setting of 8 Gloucester Gate is formed principally by the wider terrace, with which it has a strong group value as part of a unified architectural composition. The building's setting is also defined by its historic and visual relationship with Regent's Park and the other contemporaneous Nash terraces lining the Outer Circle. As a result, the building is experienced as one part of the overall context of Nash's Regency development, and this makes a positive contribution to its significance.
- 4.31 To the rear, the current closet wing makes a limited contribution to the setting and special interest of the listed building. It forms a typical Victorian extension, but one that has limited heritage value and makes a neutral contribution to the significance of the listed building.
- 4.32 To the rear, between the main house and the mews, is a small garden/courtyard experienced as an enclosed and private space. The usability of this space is limited by the low levels of light and the feeling of being "hemmed in" by the existing closet wing, mews house and flanking party walls. Nevertheless, it contributed positively to the historic domestic character of the listed building. The yard does, however, retain a narrow view that allows visitors to appreciate the blind arcade on the western elevation of the mews building, albeit this feature is not easily discernible due to the brick infill within the arches.

THE MEWS

- 4.33 8 Gloucester Gate Mews has been subject to extensive alteration to the interior since it was built in the 19th century.
- 4.34 The building retains some historic value as forming an ancillary building to the main house on Gloucester Gate, and this relationship is still legible. In that sense, it is a typical mews building of the period.
- 4.35 The blind arcade in the western elevation of the mews building is a notable feature that contributes to the setting of the listed building, and to the wider conservation area. However, the architectural value of the mews building has been eroded through successive phases of alteration.
- 4.36 Most recently, in the 1980s, the interior was entirely refurbished resulting in a completely modern planform and interior. The only surviving historic fabric appears to be contained within the roof structure.



Figure 4.10 Courtyard to rear of 8 Gloucester Gate.



Figure 4.11 Rear elevation of the mews house, featuring the blind arcade.

REGENT'S PARK CONSERVATION AREA

- 4.37 The character and appearance of the Regent's Park Conservation Area is discussed in the Council's Appraisal and Management Strategy (2011).
- 4.38 The Conservation Area, which was designated in 1969, has particular significance as a part of a greater, celebrated Nash scheme, comprising a "unique planned composition of landscape and buildings, at once classical and picturesque".
- 4.39 The Appraisal divides the Conservation Area into a six character zones. The Application Site lies in: 'the Regent's Park and Terraces fronting the park and their mews'. The area is characterised by its location at the transition of Regent's Park and the development to the east.
- 4.40 From the north, on the west side of Albany Street, the stucco terrace at Gloucester Gate is followed by plainer terraced houses on Albany Street, and Gloucester Gate Mews behind. The Appraisal notes that the mews is substantially intact (pp. 20).
- 4.41 The Appraisal also recognises the clear hierarchy of building types within the conservation area. Relevant to the Application Site are the Nash terraces and the mews buildings, of which Gloucester Gate forms one.
- 4.42 In relation to Gloucester Gate Mews, the Appraisal (2011) states that it is: *"Accessed from Albany Street, these original mews buildings are dwarfed by the rear elevation of Gloucester Gate. These stock brick buildings are the most intact of the Nash mews, and retain a real sense of their past function. There has been little apparent alteration to the elevations, or the granite setts in the roadway. The elevations of the mews houses facing the rear of the main houses have survivals of blind arcading, which suggest another element in the integrated design of the Park, where the rear of the mews houses were designed to be seen from the main houses. They have accommodation which is located over the former coach houses."* (2011, 28).
- 4.43 As we have noted in **Section 3.0**, however, the rear elevation of 8 Gloucester Gate Mews has been altered at ground floor level where the two garage doors were replaced by a single double-width entrance and pedestrian door to the right.

CONTRIBUTION OF THE SITE TO THE CA

- 4.44 As a Grade I-listed building, it is considered that 8 Gloucester Gate makes a positive contribution to the character and appearance of the Regent's Park Conservation Area. This positive contribution is derived from the following:
- The apparent age, domestic form, and attractive external envelope of the historic building, which forms part of one of several grand residential terraces which characterise the built form of the CA;
 - The historic and visual relationship between the Site and Regent's Park, which is consistent with the CA's original design and layout;
- 4.45 There are, however, elements of the Site which do not contribute to the character and appearance of the CA. These elements are as follows:
- The closet wing is a common feature attached to the properties in the northern part of the terrace, however, there are a variety of forms as shown in the historic maps in **Section 3.0**.
- 4.46 Owing to the relatively contained scale and scope of the proposals, it is considered that any impact on the character and appearance of the CA would be limited. Where relevant, impacts on the CA are addressed in the assessment of the proposals below.

OTHER HERITAGE ASSETS

- 4.47 There are a number of other heritage assets that lie in close proximity to the Application Site.
- 4.48 These comprise the following assets:
- 4.48.1 Gloucester Lodge (no.12) and Gloucester House (no. 14) and attached boundary wall (Grade I);
- 4.48.2 Numbers 2 to 11 and attached railings (Grade I);
- 4.48.3 The Danish Church (Grade II*);
- 4.48.4 Numbers 197 to 211 and attached railings (Grade II);
- 4.48.5 Numbers 213, 215 and 217 and attached railings (Grade II);
- 4.48.6 Albany Lodge and attached railings (Grade II);
- 4.48.7 Number 15 and attached boundary walls and piers (Grade II*);
- 4.48.8 Clarence Cottage (Grade II);

- 4.48.9 Statue and Drinking Fountain opposite number 15
- 4.48.10 Garden railings to Gloucester (Grade II);
- 4.48.11 Gate Lodge (Grade II);
- 4.48.12 Gloucester Gate Lodge (Grade II);
- 4.48.13 Garden railings to numbers 12 and 14 (Grade II);
- 4.48.14 Five lamp posts in forecourt of Gloucester Place (Grade II);
- 4.48.15 Regent's Park Registered Park and Garden (Grade II)
- 4.49 The principal consideration relating to the works will be whether the replacement of the closet wing will affect the significance of these heritage assets. The greater proportion of the other works will not affect the external appearance of the Site and will, therefore, have no impact on the setting and significance of these assets.
- 4.50 It is material that the existing closet wing is not visible from Gloucester Gate Mews, and is only experienced from the upper storeys of adjacent properties within Gloucester Gate, which share a similar setting as the Site. Views from the upper storeys are composed of several closet wings either side of each property, and with mews buildings set to the rear.
- 4.51 The proposed rear annex will match the height of the existing closet wing, and the only change in form will be from an orthogonal shape to one that is bowed. This change is slight and would not harm the ability to appreciate the significance of the listed buildings elsewhere on Gloucester Gate. Furthermore, there is cartographic evidence that this form has been used previously with closet wings elsewhere on the terrace, most recently at 10 Gloucester Gate. As a result, we consider that it is unlikely that their settings, and therefore special interest, would be materially affected by the proposals and these assets are scoped out of the assessment.

5.0

HERITAGE IMPACT ASSESSMENT

8 GLOUCESTER GATE, REGENT'S PARK, LONDON, NW14HG

HERITAGE IMPACT ASSESSMENT

- 5.1 This Section assesses the impact of the Proposed Development on the Grade I-listed building at No. 8 Gloucester Gate and the Regents Park CA, with regard to the legislation and planning policy set out at **Section 2.0**. The Design and Access Statement ('DAS') prepared by Downen Farmer Architects provides a nuanced discussion on the design rationale and should be read alongside this assessment.
- 5.2 The proposals represent the culmination of a detailed design process, including engagement with the Council. The scheme is intended to address the existing deficiencies within 8 Gloucester Gate, but in a manner that responds positively to the heritage sensitivities of the Site.
- 5.3 We consider the following matters are the principal considerations:
- 5.4 The impact of the proposed works on the special architectural or historic interest of the listed building;
- 5.5 the impact of the proposed works on the setting, and therefore special interest of adjacent listed buildings; and
- 5.6 the impact of the proposed works on the character and appearance of the Regent's Park Conservation Area.

PRINCIPLE OF DEVELOPMENT

- 5.7 The overarching aim of the proposals is to retain the listed building in its current and original use as a single-family dwelling. The best use of a building is one that preserves its significance in a manner that is consistent with its conservation. This is consistent with paragraph 203 of the NPPF which states heritage assets should be put to viable use consistent with their conservation.
- 5.8 The Applicants' aspirations for the project are to resolve this issue while also capitalising on the historic and architectural value of this highly graded listed building and its contribution to the wider Regent's Park CA.

- 5.9 In preparing the proposals, the desirability of conserving designated heritage assets has been afforded great weight, (consistent paragraph 205 of the NPPF) Indeed, an overarching aim of the proposals by Downen Farmer Architects has been to understand the significance of 8 Gloucester Gate and ascertain where certain elements are capable of accepting change.
- 5.10 In our consideration of the works below we are mindful of the Inspector's comments in relation to the nearby property at 56 Cumberland Terrace (a similar Grade I listed terrace by Nash) (ref: APP/X5210/E/2094610), where he stated:
- It was accepted that the building's frontage is of exceptional value, with the internal arrangement being of significantly less importance. It was also agreed by the parties that the works involved the loss of no historic fabric. However, even in such circumstances, and mindful of the private nature of these rooms, I nonetheless consider that works within the house should complement and enhance the special character arising from the front elevation. As a result, they should not harm the elements of the dwelling that reflect the historic origins of the building as a London townhouse of some stature. In my opinion this means the works before me would need to be of a form and design appropriate to the property, and would need to respect the character and proportion of the rooms.*
- 5.11 We agree with this finding and consider it relevant to the assessment of the proposals for No. 8 Gloucester Gate.
- 5.12 The project team have developed the proposals in response to a detailed understanding of the history and significance of the Site, as set out in **Sections 3.0** and **4.0** of this report. We have sought opportunities to enhance the main house and mews through improvement works, while making alterations in areas that have previously been altered and are therefore of limited or no heritage significance.
- 5.13 This approach is supported by the PPG that promotes sensitive design that delivers public benefits in a sustainable and appropriate way and paragraph 212 of the NPPF which states that local planning authorities should treat favourably those developments that better reveal the significance of a heritage asset. Moreover, Policy D2 promotes the preservation and enhancement of heritage assets.

- 5.14 In this regard, we have also been mindful of the recently consented proposals for 10 Gloucester Gate (2016/3706/P & 2016/4064/L) and the support shown by the Council. While we appreciate that the facts of every case are different, the shared development history of both Nos.8 and 10 and similarity of the proposals with the consented scheme, mean that both properties feature many of the same characteristics.
- 5.15 In that case the Members Briefing Delegated Report dated 29th August 2016 stated that the Council considered that the closet wing of No. 10 was of low significance:
- 3.8 The two storey extension between the house and mews dates from the mid/late 19th century. It does not form part of the first or key phase of development at the property and has been heavily altered. It contains few features of interest and its significance is considered to be low. In this regard its demolition is considered to be acceptable subject to the design of its replacement.*
- 5.16 This conclusion is relevant because the closet wing to the Application Site has a similar original age, yet has been subject to a greater level of alteration.
- 5.17 We also note that in relation to the replacement, the Council considered the new building to be acceptable:
- 3.9 The replacement two storey extension is considered to be well conceived. The extension allows a clear recognition of the original and new elements on the site by separating the proposed extension with a distinctive contemporary appearance and form. The curved shape has a threefold function: Firstly it allows the extension to attach neatly to the back wall of the main house. Secondly the curved form has a relationship with the bowed rear facades typical of Georgian buildings of the period, the bow shape not found on the subject property. This allows the extension read as a contemporary addition which relates to its context and it is grounded in a clear understanding of this historic value of the property.*
- 3.10 Finally the curve allows the existing brick arches on the rear façade of the mews to be better appreciated and recognised. The rear façade of the mews contains three brick arches facing the rear of the main house, which is presumed to be designed to give an attractive classical view from the rear rooms of*

the main house. At present the infill courtyard extension cuts across and the middle arch and has resulted in the infilling of the lower part of the southern arch. The proposed extension would reinstate two of the arches in the courtyard and reopen and express the third arch internally. This re-establishes the link with the mews and the house and is considered to enhance the special interest of the site as a whole.

4.4 The proposed extension would have a curved shape facing the courtyard, with high and thin windows expanding on two floors which continue on to the ground floor with two high glazed doors close to the main house and mews, and two high windows, surrounded by high quality brick. Through negotiation with the applicant the proportions between openings and brick have been revised in order to create a more refined and expressive addition. Through its design and appearance the proposal would emphasise its modernity but would retain the importance and character of the original Nash building.

- 5.18 We are mindful also of the recent appeal decision for Gloucester Lodge (LPA Reference: 2023/1742/P & 2023/2290/L) where a contemporary glazed form of extension was considered to be acceptable to the rear of a listed building
- 5.19 Overall, we conclude there is no inherent conflict in principle between the special interest of the listed building and the proposals. Therefore, attention turns to the particular effects arising from the detailed design of the proposals when the development is viewed as a whole.

ASSESSMENT OF THE PROPOSALS TO 8 GLOUCESTER GATE

- 5.20 The proposed works to 8 Gloucester Gate can be summarised as follows:
- 5.20.1 First are the works to the principal house, comprising refinements to the internal layout and a scholarly reinstatement of architectural detailing consistent with a property of this date and status. Also within this category are other works proposed to the building to enhance its function as a family home and improve the quality of accommodation.
- 5.20.2 Second, are the new build proposals, proposed to the later part of the property and where later 20th century intervention has been greatest.
- 5.20.3 Third, is the works to the mews property.
- 5.20.4 Finally, a site-wide upgrade of M&E services is intended to improve the performance of both existing and proposed built forms in relation to heating, cooling, and energy efficiency.

EXTERNAL WORKS TO FACADES AND ROOF

PRINCIPAL ELEVATION

- 5.21 The proposals include limited works to the principal façade of the property, which we consider to be the most significant element of the Grade I-listed building. The front door, sash windows and external railings are all to be retained, repaired and repainted.
- 5.22 We see the external works to the building as wholly beneficial, preserving the special interest of the listed building and its contribution to the Regents Park CA whilst demonstrably improving its external outlook.
- ### REAR ELEVATION
- 5.23 The proposed works to the rear elevation of the main volume of 8 Gloucester Gate are limited. For the most part it comprises a general scope of repairs and repainting to existing windows.
- 5.24 The only significant intervention to the rear elevation is the replacement of the modern arched sash window at second floor level and extension of the existing window to create a full height opening onto the principal staircase.
- 5.25 There is archival evidence which proves that this elevation has been much altered during the 20th century, with a series of new openings created for windows. The present arched window was inserted in 1987 and its

replacement like-for-like is, therefore, not considered to harm the special interest of the listed building.

- 5.26 The extension of the window opening to floor level would necessitate the removal of potentially historic brickwork to the rear elevation. However, this is considered to have a neutral impact on the special interest of the listed building owing to the extent of alteration to this elevation. We therefore consider that the extension of the window ought to be acceptable and would increase the level of natural light to the principal staircase, which is of high significance, thus improving the experience and quality of the accommodation.

ROOF

ROOFLIGHTS

- 5.27 At present the landing on the third floor is poorly lit by a single roof dormer that faces east, onto the rear of the building, which detracts from the quality of the interior space.
- 5.28 In response, the proposals take the opportunity to improve the amount of light that fills the space by replacing the existing roof light with a larger rooflight which would sit flush with the roof slope. It is also proposed to insert two additional smaller rooflights into the eastern slope of the roof to provide natural light to the proposed new layout at third floor level.
- 5.29 When considering the acceptability of the rooflights, the decision maker must first form a judgement on the value of the historic fabric that will be removed. Aerial photographs dating from the 1940s indicate that a dormer rooflight of similar proportions has existed here since the early-20th century. Beyond these photographs there is little evidence to indicate when the dormer was installed. For example, it is not shown in the top floor plan dating from the late 1930s. Site investigations and examination of neighbouring properties within the terrace indicate that the existing dormer is of ordinary quality and not original to the terrace. As such, despite its apparent age, it is considered to make a neutral contribution to the special interest of the listed building.
- 5.30 Removing the existing dormer would, therefore, have no material effect on the special interest of the listed building. The creation of two additional openings for new rooflights would involve the removal of some roof fabric, in the form of slates and structural timberwork.

5.31 In the case of 10 Gloucester Gate, the Delegated Report stated that the proposals for the insertion of a new roof lantern was acceptable as the fabric of the roof structure was not historic. Given the shared development history and terraced form, Nos. 8 and 10 Gloucester Gate share much of the same roof structure. As a result, we consider that the roof fabric to 8 Gloucester Gate similarly makes little contribution to the significance of the listed building beyond the impression of its overall form and external profile. The removal of a small quantity of roof fabric to the rear would, therefore, result in no harm to its special interest.

5.32 The proposals then turn on the quality and appropriateness of the new rooflights. As discussed, the principal interest of the roof derives from its external profile and its contribution to the uniformity of the terrace's roofscape. The proposed rooflights have been designed to respect the established ridge line and thus minimise impact on the legibility of the historic roof form. Furthermore, they would not be discernible from street level.

5.33 As proposed, the rooflights would deliver a notable uplift in the quality of the third-floor interior and would be experience in the context of proposed improvements to the layout at this level. Appropriate detailing of the rooflights and the minimalist approach to decoration will ensure that the secondary status of the upper floor is preserved from within the hierarchy of the building.

5.34 We therefore consider that this aspect of the works will at least preserve the special interest of the listed building.

ROOF-MOUNTED CONDENSER ENCLOSURE

5.35 The project team have considered the need for mechanical cooling and sought, initially, to endeavour to use passive cooling for the property to improve energy efficiency.

5.36 However, the Energy & Overheating Risk Statement prepared by XCO2 (July 2024) has identified a high risk of overheating within several of the habitable spaces in the main house notably:

- 5.36.1 The Master Bedroom
- 5.36.2 Bedrooms 2, 3, 4 and 5
- 5.36.3 Reception Room
- 5.36.4 Activity Room (Mews)
- 5.36.5 Study and Kitchen (Closet Wing)

5.37 Since the Grade I listed status of the building limits extensive retrofitting options to mitigate overheating the team considered that mechanical cooling was the only appropriate response to mitigate the risk of overheating.

5.38 The project team then considered a number of locations to house the condensers including on the new closet wing. However, these areas were unsightly and challenging to accommodate.

5.39 The option with the least impact was a roof-mounted enclosure because it was discrete method for housing the proposed condensers because it would have no impact on the internal planform, was not on a principal face of the roof, would not be visible from the rear garden or mews, nor would it be visible from street level.

5.40 The proposals comprise a condenser enclosure at roof level, abutting the east slope of the pitched roof, with louvred roof for air intake. The condenser would be accessed from a separate maintenance hatch.

5.41 The consolidated massing would preserve the integrity of the current ridgeline and its placement within the roof is intended to screen it from view from neighbouring properties and surrounding streets. Nevertheless, this aspect of the proposals would still result in a modest level of less than substantial harm through the introduction of additional massing at roof level.

REBUILDING OF THE CLOSET WING

5.42 The principal component of the proposals is the rebuilding of the altered 19th century closet wing.

5.43 We note that the Council raised concerns with the replacement of this part of the building during pre-application consultation, noting that the closet wing is clearly part of the evidential value of the house and has historic value representing a phase in a building's history.

5.44 There are two main considerations which relate first to the impact on significance, and secondly, on the quality of the replacement extension.

IMPACT OF THE PROPOSALS ON THE SIGNIFICANCE OF THE LISTED BUILDING

5.45 Sections 3.0 and 4.0 have shown that the closet wing is a 19th century addition that has been subject to extensive alteration and extension in the 1980s.

5.46 Notably the interior has been entirely remodelled. The closet wing now forms a secondary part of the main house, in a rear extension that was originally conceived as servant's quarters and has subsequently been extended in an ad hoc fashion.

5.47 The original use of this part of the building is no longer legible and it functions as a subordinate part of the house that has little sense of connection with the principal rooms that lie on the ground and first floors and at different levels. This is an issue that is faced by a number of the closet wings on the Gloucester Gate Terrace (and other Nash terraces).

5.48 Externally, the elevation facing into the courtyard has been altered and extended in piecemeal. It has a sense of overall uniformity through its scale, form and material palette. It is finished in yellow stock brick of standard form, with an irregular pattern of fenestration, and appears as one would expect: a secondary elevation to the rear of the main house that was not designed to be seen.

5.49 Nevertheless, this part of the building possesses some evidential value relating to the inhabitation and extension of the original house over the course of the 19th and 20th centuries. While not original, the exterior of the closet wing possesses a sufficient quantity of surviving 19th century fabric to warrant some interest.

5.50 As a result, we identify a degree of less than substantial harm to the significance of the listed building deriving from the demolition of the closet wing due to the loss of surviving fabric associated with the historic closet wing. This harm is considered to be at the low end of the scale due to this closet wing belonging to a later phase of development, its limited intrinsic architectural quality, and the degree of alteration, both internal and external. Therefore, the acceptability of the closet wing's demolition ultimately turns on the quality of the replacement building and the way that it addresses the characteristics of a secondary form responding to the principal house.

5.51 Here we highlight the Council's previous decision relating to No. 10 Gloucester Gate where Officers considered that the closet wing in that location (which did not have a 1980s extension) had low significance, a point we agreed with in that case (Montagu Evans was the planning agent and heritage consultant), and a similar assessment applies here at No. 8.

QUALITY OF THE REPLACEMENT BUILDING

- 5.52 The aim has been to add something of high architectural quality, procured to a high standard, and which would improve circulation through the building while improving outlook and amenity on what is currently a constrained rear garden.
- 5.53 We draw attention to the small yard to the rear of the property. The building has never had a garden area proportionate to its scale or of any real visual quality. The usability of this space is limited, and the associated rooms particularly on the lower floor, feel “hemmed in”. It feels more like a courtyard than a garden, and at different levels, no longer functions in the way that it may have been conceived in the 1980s when it was completed.
- 5.54 The alternative and usual way to improving amenity within a garden, would be to introduce a conservatory. And we note that a glazed rear conservatory was approved at No. 8 in 1987 (LPA Reference: HB/8770103). However, being located at lower ground floor is unlikely to have ever had the quality of light that might otherwise be expected for an exterior garden room.
- 5.55 In this case, the conservatory approach would not achieve the desired objective because of the shallow width and depth of the courtyard. There would be no outlook in a narrow room wedged in between the rear of the building.
- 5.56 The design team considered alternative forms of development, including replacing the 1980s extension (see the Design and Access Statement). However, that approach fails to deliver the meaningful function of the interior (resulting in and continuing the narrow building line as the closet wing meets the rear of the principal building).
- 5.57 The alternative, then, is to improve outlook by rebuilding the closet wing to improve the quality of the internal space, light, outlook and amenity in what is an awkward and constrained part of the Site.

PROPOSED FORM

- 5.58 The form of the replacement annex has been subject to optioneering. Through this exercise, it has been shown that the retention and extension of the existing closet wing would encroach on external amenity and result in constricted circulation and internal areas, which would then put pressure on more sensitive spaces within the listed building.

- 5.59 One of the principal objectives of the new annex is to provide an adequately sized kitchen for the house. The existing width of the closet wing would not allow for this. From a size perspective, the only alternative space for a kitchen is the principal front room at ground floor level, but conversion here would be inappropriate in terms of building hierarchy and potential impact on historic fabric.
- 5.60 The new annex is therefore proposed to replace the existing closet wing. It would be two storeys above ground and the same overall height as the existing in order to remain subservient to the main house whilst successfully mitigating between the scale of the mews. It would extend beyond the existing building line of the closet wing to abut the rear mews house. We note that an extension of the existing closet wing to adjoin the mews house was granted as part of the 1987 proposals.
- 5.61 The proposed annex would have a bowed elevation facing into the proposed courtyard at ground and first floor. The curvilinear form would contrast with the rectilinear geometry of the main house to distinguish it as a secondary addition. This design has been influenced by bowed bays that form part of the recognised vocabulary of neo-Classical architecture and were used by many architects of the period, including John Nash. It is therefore consistent with the historic context and value of the listed building.
- 5.62 We note, specifically, that a bowed bay of similar proportions was used in the closet wing of No. 7 Gloucester Gate, which was built between 1872 and 1895, and a more recent bowed interpretation has been successfully delivered at 10 Gloucester Gate.
- 5.63 In the case of 10 Gloucester Gate, the curved form was determined by the Council to have a threefold function: enabling the extension to attach neatly to the rear of the main house, referencing the bowed rear facades typical of Georgian buildings of the period while reading as a contemporary addition, and allowing the existing brick arches on the rear façade of the mews to be better appreciated and recognised.
- 5.64 We consider, therefore, that a similar approach to the form of the replacement annex at 8 Gloucester Gate is equally appropriate subject to detailed design.
- 5.65 Finally, we note that the Council identified in its pre-application consultation response that in relation to the scheme at No. 10 Gloucester

Gate Historic England had a concern with the “bowed shape” of the new building in that case (7th November 2016).

- 5.66 We make three observations which were pertinent to that case but also are applicable to this application.
- 5.67 First, Historic England did not object to the proposals and were content with the Council to determine the application while also sending a draft a letter of authorisation. Plainly, the reservation was not determinative or sufficient to maintain an objection to the application.
- 5.68 Second, Historic England declined to comment on these proposals during pre-application consultation.
- 5.69 Third, and finally, the Council considered that the form of the replacement annex was not only appropriate but also “*well conceived...as a contemporary addition which relates to its context and it is grounded in a clear understanding of this historic value of the property*” (paragraph 3.9 of the Officer’s Delegated Report (Members Briefing)).
- 5.70 We see no material change in circumstance with No. 8 Gloucester Gate. The proposals now before the Council are similarly well-conceived and reflect what is an established and acceptable form of development on the terrace.

DETAILED DESIGN

- 5.71 Internally, the annex will be formed of three floors. The lower ground floor will consist of a studio/gym space and associated shower facilities. The ground floor will comprise a kitchen while the first floor would have a study and separate WC. Access will be provided from the ground and first floors of the main house as well as from the mews house at lower ground floor.
- 5.72 The curved form provides space for a kitchen of suitable size for modern living. This space is intended to function as the new ‘heart of the home’. The volume of the kitchen, its location (in a similar position to the existing) and proportions would not affect the legibility of the established hierarchy of space within the main house.
- 5.73 Notably, the elevation facing into the rear courtyard has been adapted through the design development process responding directly to the Council’s pre-application comments. The design team has been mindful of the Council’s view that previous iterations were too “resolved” with the resulting building appearing more like a pavilion whose formality and consistent fenestration challenged the secondary character of the existing closet wing and indeed, its historic ancillary use:

- 5.74 The gentle curve of the bowed façade is now modestly pulled away from the house and mews reflecting more of the historic bowed bays found at No. 7 for example.
- 5.75 The asymmetrical pattern of fenestration has been applied so that the façade is redolent of the slightly discordant secondary character of the existing.
- 5.76 The solid to void ratio of 5:3 would also retain a semblance of the 'ad-hoc' appearance of a traditional closet wing, reducing the amount of glazing and giving greater solidity.
- 5.77 The new annex would not pretend to be historic or feature any ornamentation to elevate its status or confuse its identity.
- 5.78 These characteristics are illustrated in the Design and Access Statement which also include views from the principal rooms in the main house and from the mews. These CGIs illustrate that the proposed annex would preserve the ancillary character of the outlook. Indeed, the annex would not draw the eye or detract from the formality of the principal building when looking from the Mews to the rear of the house.

CIRCULAR ECONOMY

- 5.79 Downen Farmer Architects have been mindful of the circular economy aspirations and would seek to reuse as much of the existing fabric (and brickwork) as possible in the new extension. This would also ensure consistency in the material palette and reflect the materiality of the main house. The lighter and plainer materiality provided by the glazing, and precision of the architecture, would result in a much-improved ability to appreciate the external spatial quality of the yard to the rear of the main house. This is particularly compelling when considered in comparison to the existing brick elevation that is overbearing. The brick detailing and window frames have similarly been designed to a high specification and would distinguish the annex as a contemporary addition to the listed building.
- 5.80 The curvature of the elevation will ensure that two of the arches to the rear of the mews house would be retained and visible, being reopened as part of the proposals. This would re-establish the link with the mews and the house.

SUMMARY CONCLUSION

- 5.81 In conclusion, the replacement of the mid-19th century closet wing with a contemporary annex would result in a new addition of high design quality, which is more than capable of offsetting the harm deriving from the partial loss of historic fabric and evidential value embodied in a much-altered later extension.
- 5.82 The proposed annex has been designed to provide additional space to relieve pressure on the principal rooms within the listed building and external amenity, whilst remaining sensitive to both the main volume of 8 Gloucester Gate and the associated mews house in terms of its subservient scale, form redolent of Nash architecture, and ancillary character.
- 5.83 The detailed design seeks to blend reused historic fabric with contemporary details that mediate between old and new fabric. As such, the proposed annex would demonstrably improve the appearance to the rear of the listed building, especially when compared to the current condition, whilst retaining the ancillary character and function of this part of the property.
- 5.84 Furthermore, the annex would comply with the Council's guidance on rear extensions in Home Improvements CPG (2021) as follows:
- 5.84.1 The new closet wing would be contextual in brick and therefore durable following similar materials to the host building.
- 5.84.2 The innovative design approach addresses the specific site constraints and relates well to the host building.
- 5.84.3 The extension would be subordinate to the host building's form, footprint, scale and proportions.
- 5.84.4 It would respond to and respect the design proportions of the main building.
- 5.84.5 The height, width and depth of the extension has been carefully considered.
- 5.84.6 The proposals would allow for a reasonably sized garden and improvement to the greening of the outside space.
- 5.84.7 The extension would also respond positively to energy efficiency and greening.

- 5.85 On balance, we consider that the replacement of the closet wing would have a net beneficial impact on the special interest of the Grade I listed building. The less than substantial harm (which we consider to be low on the spectrum) deriving from the demolition of the surviving 19th century closet wing would be outweighed by the demonstrable aesthetic and functional improvements to the property associated with the high-quality design of the replacement annex.

WORKS TO EXTERNAL COURTYARD AND LANDSCAPING

- 5.86 The Proposals include scope for improvements to the rear courtyard area, including a new landscaping strategy and green wall system. This seeks to optimise and improve the external amenity within the property, which is currently poor quality and underutilised, and would be experienced principally in the context of the proposed annex and the rear elevations of the listed building and the mews. A modern external staircase, which is of limited quality, would also be removed and this would constitute an enhancement to the listed building.
- 5.87 The implementation of the works and landscaping to the courtyard would improve the experience and appearance of this space and, by extension, its functionality within the context of the wider property. Furthermore, the courtyard would become a pleasant space from which to appreciate the rear elevation of 8 Gloucester Gate. Therefore, it is considered that this aspect of the works would constitute an enhancement to the setting of the listed building.

INTERNAL WORKS TO PLANFORM AND CIRCULATION

LOWER GROUND FLOOR

- 5.88 The proposals for lower ground floor seek to create a series of small ancillary rooms through the removal of 20th century partitions and insertion of new ones within the framework provided by the historic spine walls. Historically, this level has had a more granular planform and ancillary character than the upper floors, and has been subject to much alteration. As such, the proposed new layout at this level would have a neutral impact on the special interest of the listed building.
- 5.89 That judgement was broadly supported by the Council during their pre-application consultation with the exception of the design of the elevation of the basement facing the rear of the principal building. In response the design has been amended to retain the solid to void ratio and general character of the existing elevation.

GROUND FLOOR

- 5.90 At ground floor level, it is proposed to create a double-width opening between the front and rear principal rooms. This is a feature that is commonly added to historic town houses to improve the liveability and functionality of the plan form. In this case, the uses are proposed as a dining room and bar/library room, resulting in historically sensitive and accurate functions, and which will have the ability to communicate with one another.
- 5.91 This change would not affect historic fabric, as this wall was reinstated in the 1980s, and will enhance the functionality of the ground floor rooms in their proposed use as principal family rooms. Nevertheless, the proposed opening does not reflect the historic planform of a property of this type, and so we identify a limited degree of less than substantial harm from the introduction of this opening.

FIRST FLOOR

- 5.92 At first floor level, the flat arch opening between the front and rear rooms would be enlarged to allow for the reinstatement of the room's historic form and new joinery would be appropriately detailed. This would constitute an enhancement to the listed building. We note that the Council did not object to this approach during the pre-application consultation.

SECOND AND THIRD FLOORS

- 5.93 The proposed alterations at second and third floor level relate to the rationalisation of these spaces, which have been subject to considerable alteration in the 1980s.
- 5.94 The proposed design for the second-floor master bedroom, closet and bathroom has been the result of careful consideration. It is proposed to remove the partitions enclosing the existing secondary staircase on the south side of the master bedroom and insert a new partition to 'square-off' the room. This is enabled by the proposed reconstruction of the secondary staircase. Whilst this would result in the loss of remnants of historic planform within the second-floor master bedroom, causing some harm to the significance of this part of the listed building, it would greatly improve the proportions of this principal second floor room.
- 5.95 The layout to of the walk-in closet is another point of focus, noting that the existing partition within the bathroom currently almost meets the chimney breast. The proposals would retain the position of this wall (a change from the pre-application proposals). The existing opening to the master closet would be infilled, and a new opening created further south to improve circulation.

- 5.96 The existing step which 'divides' the rear room (to allow for servicing the current bathroom) is to be removed. This would unify the spaces and enhance the layout.
- 5.97 In addition, the applicant would like to reverse the layout of the secondary staircase. The purpose would be to assist the flow of the floor, with the stairs opening closer to the landing shared with the principal staircase.
- 5.98 The proposed reversal and reconstruction of the secondary staircase would not undermine the legibility of the building or the hierarchy of the space. Nor would historic fabric be lost because on-site investigations by timber specialists (see *Interior Details* brochure by Goddard and Studio) suggest the secondary staircase has been remodelled, perhaps when the main staircase was altered between the first and second floors.
- 5.99 The new secondary staircase would be executed in timber. Any historic fabric would be retained and reused, while the modern stair banisters will be replaced with a design more in keeping with the character of the building. As a result, this element would continue to be understood as a secondary feature and accordingly, we consider that this aspect of the proposals respects the status and character of the internal arrangement. As demonstrated on plan, the repositioning of the secondary staircase would greatly improve circulation between second and third floors. We therefore consider this change to be an enhancement to the planform of the listed building.
- 5.100 Another aspect of the proposals for the secondary staircase includes the opening of an infilled arch over the stairwell at second floor level to benefit from the enlarged window opening to the rear elevation. On-site investigation has revealed that this arch has been infilled with modern fabric and therefore its opening up would have a beneficial effect on the special interest of the listed building by reinstating the original appearance of the arch.
- 5.101 At third floor, the changes comprise the rationalization of the plan form through removal of all existing partitions and insertion of a new layout which broadly mirrors the existing but improves the general proportions of the landing and rooms and takes account of the repositioned staircase. This level has been the subject of considerable alteration over the course of the 20th century and is, therefore, less sensitive to change. In our judgement, and overall, these works would reinstate historic features and would enhance the significance of the building.

INTERNAL REFURBISHMENT WORKS

- 5.102 The proposals include scope for a large programme of sensitive refurbishment of historic interior fabric and reinstatement of period-appropriate details, including architraves, cornices, and joinery. Where architectural features are to be retained and restored this is identified in the architectural plans and accompanying information provided by Goddard & Studio.
- 5.103 Similarly, where architectural features are to be reinstated, such as flooring, joinery, skirting and cornices, this is outlined in detail in the Interior Details design document and other supporting information.

FIXTURES, FITTINGS AND FINISHES

- 5.104 The majority of the current internal fixtures, fittings and finishes date from the 1987 refurbishment of the property and comprise relatively low-quality facsimile of generic period details. Wherever practicable, the design and specification of new fixtures, fittings, finishes, plasterwork and joinery have been informed by remnants of original fabric and detailing, which are to be restored and integrated into the wider scheme, as well as other historic precedents. The refurbishment of historic fabric and integration into a coherent interior design scheme would significantly enhance the character and appearance of the listed building and is therefore a heritage benefit.

FIREPLACES

- 5.105 The proposed replacement of fireplaces at ground, first, second and third floor levels has been subject to considerable research and analysis. Nearly all of the fireplaces to be replaced have been assessed by a leading practitioner to be later additions, as evidenced by their design and/or the way they have been installed. The evidence is provided in the *Interior Details* report prepared by Goddard and Studio.
- 5.106 The existing fireplaces are later C20 additions and do not reflect the character of the Regency house. Their removal, therefore, should be considered to be acceptable in principle. The replacement fireplaces are all considered to be period-appropriate and have been designed to a high specification. This would enhance the appearance of the building interior and would constitute a heritage benefit. The only original fireplace, in the rear room at third floor level, would be retained. The others would be replaced with suitably designed fireplaces of the Regency period and recommended by Goddard & Studio with assistance from *Jamb* who are specialists in historic fireplaces.

STAIRCASES

- 5.107 The proposals include scope for the repair and refurbishment of the original stone staircase and handrail from ground to second floor level, which would improve the appearance and functionality of a significant remnant of historic fabric, enhance the special interest of the listed building, and would therefore be a heritage benefit. The detail of the justification and proposal is set out in the *Interior Details* brochure by Goddard and Studio.
- 5.108 The proposed refurbishment of the basement and secondary staircases, while less significant, would similarly improve the appearance of the interior.

DOORS

- 5.109 The majority of the doors are non-original and were installed as part of the 1987 refurbishment and are relatively low quality replicas of a typical 19th century panelled door.
- 5.110 It is proposed to replace the existing single-leaf doors to the principle rooms at ground and first floor level with a more appropriate and better quality six-panel door design featuring period-appropriate ironmongery. This would enhance the appearance of the building interior and would constitute a heritage benefit.
- 5.111 Where original or historic timber doors survive in situ, they are to be retained and restored. Where necessary, new period-appropriate joinery would be installed to enhance their appearance and function. The strategy for the doors has been carefully conceived to minimise loss of historic fabric. Any harm arising from loss of historic joinery must be considered in the context of the development proposals as a whole.

LIGHTING AND AV STRATEGY

- 5.112 The proposals also seek to formalize the lighting strategy throughout the listed building, along with integrated AV. The removal of existing modern recessed downlights is considered to have a neutral impact on the listed building.
- 5.113 The proposed lighting strategy consists of wall-mounted light fixtures and ceiling pendants to the principal rooms and circulation spaces at ground and first floor level. This is entirely consistent with the way in which these spaces would have historically been illuminated and would constitute an enhancement to the character of these important areas within the listed building.

5.114 In areas of lower sensitivity, such as the basement, second and third floors, the lighting strategy comprises a mix of wall lights, pendants, and recessed and surface-mounted down lights. The location of recessed light fixtures has been carefully considered, so as to impact modern ceilings only.

5.115 The proposed AV strategy has been guided by similar principles. Invisible speakers are proposed in a number of key rooms and would be plastered into the ceilings. Access panels and recessed fixtures have been limited to modern ceilings only, to prevent impact on historic fabric.

5.116 Overall, it is considered that the proposed lighting and AV strategy would have a neutral impact on the special interest of the listed building.

UPGRADE OF SERVICES

5.117 An important part of the scope of works is to upgrade the mechanical and electrical services throughout 8 Gloucester Gate. The proposed heating, cooling and energy strategy has been devised to adapt the property in line with modern living standards and mitigate the effects of climate change.

5.118 It is proposed to reuse existing riser locations for service routes, to limit the impact on the character and appearance of significant internal spaces within the building. New lighting, AV, and power sockets would be of a high quality specification and carefully positioned to mitigate their visual impact on the character and appearance of the interiors, whilst also preventing excessive loss of historic fabric.

5.119 Heating will be via a combination of underfloor heating and radiators heated by a new energy efficient boiler. The existing plant rooms at lower ground floor level, within the vaults, are to be retained and enhanced. Underfloor heating will be used in areas where minimal alterations to joists can be achieved. This would entail the use of heat diffusers located between joists which are connected by pipework looping between the joists themselves. Such a system requires minimal notching in joists to accommodate the pipework (usually just one at each end) if alterations do not already exist to accommodate existing services. This also allows original floorboards to be retained where they still exist and typically does not require the raising of floor levels.

5.120 In terms of cooling, natural ventilation will be utilised where possible in the context of the building's layout and listed status. In several rooms across first, second and third floors in 8 Gloucester Gate and the upper floor of the mews, it is proposed to install FCUs within joinery and high-level grilles

integrated within the cornices. This is considered necessary to mitigate the risk of overheating within these rooms, as identified in the Energy & Overheating Risk Statement (July 2024) by XCO2. The integration of the FCUs have been carefully designed to mitigate their visual impact on the appearance and character of the interiors, particularly the principal spaces at first and second floor level. The FCUs would be connected to the condensers located within the roof-mounted enclosure discussed above.

5.121 Overall, we identify an enhancement to the special interest of the listed building through the proposed upgrades to services which will improve the energy efficiency of the building which is a material benefit in the context of climate change. The proposed M&E improvements are consistent with the general objective to improve the efficiency of existing buildings, and the client is taking the opportunity to do so within the constraints of the listed building. With regard to heating, the proposals would be consistent with other heating systems permitted and installed within listed buildings elsewhere in the LB Camden. The proposed energy efficiency measures, and the rationale behind them, are set out in the supporting documents which accompany this application.

ALTERATIONS TO THE MEWS HOUSE

EXTERNAL WORKS

FRONT ELEVATION

- 5.122 To the front elevation of the mews, it is proposed to remove and enlarge the garage door and alter the length of the first-floor window openings. Across the length of the mews, the window and garage door openings differ in size and treatment, with many having been introduced or reinstated in the 1980s refurbishment.
- 5.123 In the case of 8 Gloucester Gate, the current garage door opening and central first floor sash window opening were created as part of the 1987 refurbishment. The other two first floor window openings are older, but relatively ordinary in their appearance. We consider, therefore, that the proposed works to the front elevation of the mews house are acceptable and would not harm the significance of the building, a judgement that is consistent with the Council's position at pre-application stage.

REAR ELEVATION

- 5.124 To the rear elevation of the mews, it is proposed to open two of the blind Roman arches facing onto the rear courtyard of 8 Gloucester Gate.
- 5.125 A similar approach to new openings in the blind arcade of a Gloucester Gate Mews building was recently consented at 10 Gloucester Gate, albeit in this case the openings were double height. It is also noted that several of the adjacent properties have also made openings in these blind arches to create modern Diocletian window/fanlights. As such, it is considered that openings within the historic arches is acceptable in principle, subject to design and impact on fabric.
- 5.126 As discussed in **Section 4.0**, the survival of blind arcading is a historic feature and indicates the integrated design of the Park, whereby the rear arcade screen of the mews houses were designed to be seen from the main houses. We therefore identify a degree of harm deriving from the proposed openings, although it is important to note that the legible form of the arcade would be retained, and the extent of opening would be consistent with other mews properties in the terrace. Furthermore, the brickwork from the infills would be retained and repurposed for the new closet wing façade.
- 5.127 The openings would be fitted with a modern unintrusive glazing strategy so as not to detract from the primacy of the listed building and visually tie

in with the proposed glazing to the new annex. One opening would have a fixed windowpane and the other would be fitted with a double-leaf glazed door. This would improve both circulation and the visual relationship between the main house and the mews.

- 5.128 In calibrating the level of harm, we consider that it would be modest given the fabric being affected is of limited significance and the creation of glazing within the recessed arches would retain the legibility of the form of this feature.
- 5.129 We note that the Council identified some less than substantial harm arising from these works within the pre-application consultation. That harm is capable of being outweighed by the public benefits of the development.
- 5.130 The containment of the rear elevation means that there would be no effect on the character and appearance of the Regents Park CA. There will be a discernible change to the immediate setting of 8 Gloucester Gate, but this is not considered to be sufficient to materially alter its significance.

ROOF

- 5.131 The intention is to reinstate the appearance of the interior of the upper floor of the mews by revealing the roof trusses.
- 5.132 This also gives the opportunity to review the condition of the roof timbers, as well as to improve the thermal performance through appropriate and suitable insulation.
- 5.133 In doing so the it is proposed to expose the roof structure and to relocate the central trusses further east and west to create a more open central portion. This amendment the existing design will necessarily retain the character and appearance of the historic roof, but with a modern movement to bring space and light into the space. That light would be delivered through a full width conservation rooflight on the inside pitch of the roof.
- 5.134 This approach will necessarily require the dismantling of the roof, not least to inspect the condition and replace on a like for like basis. The method is justified, however, because the principal trusses will be retained along with purlins and the roof tiles, while also taking the opportunity to improve the thermal performance of this part of the building. We note here that Historic England's recently published guidance *Adapting Historic Buildings for Energy and Carbon Efficiency (2024)* suggests at paragraph 86 that insulation within the roof plane will be acceptable in some cases. In this

situation historic plasterwork or significant elements of the roof would not be obscured.

- 5.135 We identify some limited harm from the potential loss of fabric during this operation. However, that harm would be balanced and outweighed by the replacement of fabric on a like for like basis to ensure the long-term conservation of the roof.
- 5.136 We also consider that this aspect of the works will at least preserve the character and appearance of the Regents Park CA.

INTERNAL WORKS

- 5.137 An important change would be the link to the kitchen created through openings in the rear wall at ground floor level. This would be included to provide communication to between the two parts of the property. An opening between the main house and the mews house already exists at basement level, so the impact of this work would have a neutral effect on the significance of 8 Gloucester Gate. This change was deemed acceptable by the Council within their pre-application consultation response.
- 5.138 The proposals for the mews interior would see the general reconfiguration of the internal planform to facilitate an improved garage space at lower ground floor and an activity room above. All of the internal fabric and planform within the mews dates from the late-20th century and is of no particular historic or architectural interest.
- 5.139 The scheme also proposes to remove the current ceiling throughout first floor level to expose the roof structure of the mews house above. The ceiling is also thought to date from the 20th century and its removal would, therefore, not constitute the removal of historically significant fabric.
- 5.140 These internal works to the mews house would not materially alter the external appearance and character of the mews house and would, therefore, have no effect on the significance of 8 Gloucester Gate.

SUMMARY HERITAGE ASSESSMENT

- 5.141 The principal objective of the Proposed Development is the refurbishment and upgrading of this listed building to enable its continued function as a family home. The preservation of the building's special interest and the improvement of its internal character is central to the design.
- 5.142 Under paragraphs 205–206 of the NPPF, great weight should be given to the conservation of designated heritage assets even where the harm would be less than substantial, and any harm should require a clear and convincing justification. From the Courts' interpretation of Section 16(2) of the 1990 Act, considerable importance and weight should be given to the desirability of preserving the special interest of listed buildings in any balancing exercise with material considerations which do not have this status.
- 5.143 The considerable importance and weight to the desirability of preservation, should tip the scales to produce an unequal balance in its favour. However, the decision maker should still take account of the scale of change, and so the extent of impact, as well as the relevance to its significance, and the importance of the asset. The overall weight to be given to any harm should be a product of these factors.
- 5.144 In principle, the Proposed Development would be appropriate to the character of the building as a first-rate Regency townhouse and would preserve the exceptional interest of its principal frontage.
- 5.145 Nevertheless, we have identified some less than substantial harm to the significance of 8 Gloucester Gate through the following:
- 5.145.1 Installation of roof-mounted condenser enclosure to 8 Gloucester Gate;
- 5.145.2 Loss of 19th century fabric and evidential value associated with the rebuilding of the much-altered closet wing;
- 5.145.3 Creation of a double-width opening between the principal rooms at ground floor level;
- 5.145.4 Alterations to planform at second floor level to accommodate the relocation of the secondary staircase;
- 5.145.5 Potential loss of fabric when rebuilding the mews roof to secure its long term future and improve energy efficiency; and
- 5.145.6 The loss of fabric in the creation of two glazed openings within the blind arcade to the rear of mews.
- 5.146 These interventions are generally proposed in areas of previous alteration, and each alteration, as described, is proposed to enhance the function of the property in its original use as a family home and, notably, the harm has been minimised.
- 5.147 When considered overall (i.e. these impacts are considered together in the context of the listed building as a whole), we consider that the harm would not come close to affecting a key element of the significance of the asset (as set out in the PPG) moreover, the test of substantial harm is a high one.
- 5.148 Rather, the impacts that are harmful have been minimised and are justified to avert redundancy and deliver a development of high design quality. Taking account of the considerable importance and weight that should be given to the desirability of preserving the special interest of listed buildings, we have found the overall weight to the harm to the significance of the listed building as being less than substantial and low.
- 5.149 Paragraph 208 of the NPPF requires a balance in an instance of less than substantial harm to the significance of a designated heritage asset.
- 5.150 Having comprehensively reviewed the development we have identified a series of heritage benefits deriving from enhancements to the main house, principally to the primary spaces at ground and first floor levels. These comprise:
- 5.150.1 Securing the long-term future and conservation of the listed building through a comprehensive refurbishment and alteration in a single phase;
- 5.150.2 Replacement of the modern stone hallway with a more appropriate design and materiality;
- 5.150.3 Reinstating the original proportions of the opening between the first floor principal rooms;
- 5.150.4 Refurbishment of the principal staircase, and improvements to both the basement and secondary staircases;
- 5.150.5 Scholarly repairs and reinstatement of appropriate decorative plasterwork and joinery throughout the building;
- 5.150.6 The removal of existing fireplaces of varying quality and age, and installation of appropriately detailed fire-surrounds to each of the principal rooms;
- 5.150.7 Replacement of 1980s fabric with appropriately-detailed fixtures, fittings and finishes executed to a high specification;
- 5.150.8 Removal of low-quality 1980s fitted joinery;
- 5.150.9 General improvements to the layout and circulation through the listed building, particularly in relation to the proposed new annex and the mews house; and
- 5.150.10 Positive setting impacts deriving from the high-quality design of the new annex to the rear and the associated landscape improvements to the courtyard.
- 5.151 These works, which seek to respect and reinstate original proportions and hierarchy in these principal spaces, will enhance the legibility of the building and improve the quality of its fabric. The reinstatement works would be based on analysis of surviving historic fabric and suitable precedents to ensure that any new fabric is a scholarly addition that is historically appropriate.
- 5.152 In our judgement, therefore, and overall, the proposals have the potential to enhance an appreciation of the listed building through its refurbishment, the scholarly replacement of historic features and the improvements to its principal spaces and circulation. Importantly, they would secure a long-term viable use for the building in the use for which it was originally intended. We consider, then, that the heritage benefits of the development are substantial and would decisively outweigh the identified harm deriving from proposed works to facilitate that use.
- 5.153 It is accordingly our view that as presented, the proposals meet the statutory tests and relevant policy requirements in respect of the historic environment.

6.0

PLANNING ASSESSMENT

8 GLOUCESTER GATE, REGENT'S PARK, LONDON, NW14HG

PLANNING ASSESSMENT

6.1 In this section we provide an assessment of other planning considerations relevant to the determination of this application.

DESIGN

- 6.2 High quality and inclusive design is encouraged at all policy levels. The NPPF notes that good design is a key aspect of sustainable development, and should contribute positively to making places better for people.
- 6.3 Policy D1 (Design) of the Local Plan outlines that development will incorporate exemplary standards of high quality, sustainable and inclusive design that relates positively to its local context, with particular regard to the character and appearance of the existing and surrounding area and the materials, scale and massing that can deliver sustainable development, extending the lifetime of the building.
- 6.4 The existing layout of the Site presents a challenge due to the constrained nature of the existing closet wing and its relationship to the main volume of the house. The internal floors are set at a different level to those within the main building, creating a disjointed route through the Site and detracting from the quality of the internal spaces.
- 6.5 The proposals for the new annex would improve the appearance and amenity to the rear of the listed building through the removal of the existing closet wing, which will be replaced by an extension that is of high design quality and sensitive to its immediate context in terms of its form, scale and materiality.
- 6.6 It is concluded, therefore, that the Proposed Development would comply with Local Plan Policy D1.
- 6.7 We note also that the new annex would not be any higher than the existing closet wing nor additional massing, and consequently there would not be a materially greater impact on neighbour's residential amenity.

SUSTAINABILITY

POLICY CONTEXT

- 6.8 It is clear that Policies CC1 and CC2 are directed to climate change mitigation in new buildings.
- 6.9 Requirements (set out in Policy CC1) to provide zero carbon development, meeting London plan targets in major development, mixed use developments to reduce travel, passive design measures and central energy networks plainly do not apply to existing buildings. This is clear in the supporting text which refers to developments of 500sqm or more requiring an energy statement, and the need for new residential development to demonstrate CO₂ reductions. The supporting text variously refers to requirements for major developments. Plainly 8 Gloucester Gate does not fall into any of these categories.
- 6.10 Similarly, Policy CC2 sets out a series of criteria for developments involving 5 or more developments or 500sq m or more of space. Again, plainly 8 Gloucester Gate does not fall within this threshold.
- 6.11 Thus, our understanding of Policies CC1 and CC2 is consistent with the Council's application of the policies in recent months. There is no specific restriction on the use of plant in an existing dwelling house and therefore we do not consider there to be a conflict with the quoted policies.

ENERGY EFFICIENCY

- 6.12 The Proposed Development would make use durable and high-quality materials, with high-performance thermal insulation and other measures to improve energy efficiency. Where possible, existing fabric will be salvaged and re-used, and waste will be re-cycled where possible.
- 6.13 The re-building of the rear extension presents the opportunity to improve the environmental and sustainability credentials of the Site through delivering a building with enhanced thermal properties, improved layouts and a future-proofed design.
- 6.14 Other improvements to energy efficiency include:
- 6.14.1 Improvements in insulation to walls, ceiling and the lower ground floor slab where feasible;
- 6.14.2 Energy efficient heating via a combination of under floor heating and radiators with time and temperature control zones;
- 6.14.3 Natural ventilation used where feasible given layout and conservation constraints of property; and

6.14.4 use of double glazing where appropriate in new windows.

- 6.15 The *Energy and Overheating Risk Assessment* prepared by XCO₂ provides justification for the use of mechanical cooling including thermal modelling and an assessment of the cooling hierarchy. The report concludes in relation to Energy:

The proposal is a minor application therefore some policies are not applicable, but the development aims to maximise energy savings and reduce overheating risk, in line with the approaches set out by Camden Council and the Greater London Authority. Since the development is an extension of an existing dwelling, it is not expected that it will be required to meet the London Plan energy and carbon reduction requirements against new build Part L 2021 standards.

However, SAP calculations have been carried out to demonstrate compliance with Part L 2021 Building Regulations for an extension to an existing dwelling, which represent challenging energy and carbon targets.

It was found that the efficient building fabric of the proposed extension comprising low U-values reduced the heating demand of the dwelling, by minimising heat loss through the fabric. These improvements demonstrated improved energy, carbon, and fabric efficiency in comparison with a 'notional' Part L compliant extension.

Despite constraints regarding the Grade I Listed status of the dwelling, some upgrades to the mews building and select windows are proposed to improve energy performance further.

- 6.16 In relation to Overheating the report concludes:

Dynamic thermal simulations using IES VE modelling software have been carried out to assess the risk of overheating within the proposed space.

The overheating strategy uses passive measures to mitigate risks, in line with the Cooling Hierarchy. These measures include natural ventilation in daytime through fully openable windows, solar control measures including a low glazing g-value of 0.50, and night ventilation allowing a secure opening of 10% free area for sash and side-hung windows in bedrooms.

The Closet Wing building was able to meet CIBSE TM59 recommended criteria for living rooms and kitchens based on the London Weather Centre DSY1 weather scenario (2020s,

high emissions, 50% percentile) following implementation of the passive measures.

On the other hand, the habitable spaces in the Main House demonstrated a high risk of overheating despite the passive measures tested under DSY1 weather scenario. Since the Grade I listed status of the building limits retrofitting options to mitigate overheating, comfort cooling would be required for the habitable spaces of the Main House to meet CIBSE TM59 criteria based on DSY1 current weather scenario.

The following habitable spaces within the Main House would benefit from comfort cooling to meet the CIBSE TM59 thermal comfort criteria under the DSY1 current weather scenario:

- Master Bedroom;
- Bedroom 2;
- Bedroom 3;
- Bedroom 4;
- Bedroom 5;
- Reception Room.

Whilst developments are not expected to achieve compliance with the criteria based on simulations ran with warmer weather scenarios DSY2 and DSY3, energy-efficient comfort cooling would be beneficial for further habitable building spaces within the Closet Wing and Mews buildings to demonstrate compliance with these parameters, to ensure the dwelling occupants are comfortable during spells of hotter temperatures.

The following habitable spaces within the Closet Wing and Mews would benefit from comfort cooling to meet the CIBSE TM59 thermal comfort criteria under the DSY2&3 future weather scenario:

- Activity Room (Mews);
- Study (Closet Wing);
- Kitchen (Closet Wing).

RETENTION AND REUSE OF EXISTING FABRIC

- 6.17 A study to identify the possibility of retaining the existing rear closet wing has been undertaken. Retention of the existing building would also mean that the opportunity to improve the character, quality and function of the residential accommodation on the Site would be lost, which is supported by Policy D1 of the Local Plan.

6.18 In light of the above, it is considered that the demolition of the closet wing building is acceptable in sustainability terms.

6.19 The application proposals are consistent with the general objective to improve the efficiency of existing buildings, and the client is taking the opportunity to do so within the constraints of the buildings listing. The adopted energy efficiency measures will be set out within the application material.

6.20 Key to these proposals is the refurbishment and upgrading of the building fabric to enable its continued function as a family home. The preservation of the building’s special interest and the improvement of its internal character is central to the design.

6.21 Re-use of what already exists on-site will reduce carbon emissions. Research will be undertaken to identify and quantify the opportunities for reuse of the closet wing structure. Where this is not possible, recycling and re-purposing of these materials will be arranged.

NOISE AND VIBRATION

6.22 LBC Local Plan Policy A4 (Noise and vibration) seeks to ensure that noise and vibration is controlled and managed.

6.23 LBC will not grant planning permission for development likely to generate unacceptable noise and vibration impacts or development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.

6.24 The proposals include the replacement of air-conditioning with comfort cooling. The air-conditioning will be placed on the roof of the property and within the vaults at lower ground floor.

6.25 The roof plant will be placed within a plant enclosure which will form aesthetic and acoustic attenuation.

6.26 The Plant Noise Impact Assessment prepared by EEC concludes that the noise limits would not be exceeded during any period at any noise sensitive location (paragraph 7.10).

PARKING

6.27 We note that Policy T1 of the Camden Local Plan, Council expects cycle parking at developments to be provided in accordance with the standards

set out in the London Plan. Any such provision of long stay residential cycle parking spaces would be secured by condition.

6.28 The Property allows for cycle parking as part of the development.

6.29 We also note that Policy T2 of the Camden Local Plan states that all new residential development should be secured as on-street residents parking permit (car) free by means of a Section 106 Agreement. This approach is intended to prevent the future occupants from adding to existing on-street parking pressures, traffic congestion and air pollution, whilst encouraging the use of more sustainable modes of transport such as walking, cycling and public transport.

6.30 We note that this issue was considered as part of the application (LPA Reference: 2020/5262/P) at 55 Cumberland Terrace (another Crown Estate freehold terrace). However, a restriction on parking was not deemed necessary because the Council does not have permit eligibility because the building lay on private land with its own parking scheme.

6.31 The same principle applies to 8 Gloucester Gate, which similarly lies on land owned by the Crown Estate. Moreover, the Outer Circle is pay and display and Albany Street is double yellow.

6.32 We therefore consider that a restrictive parking is not necessary, proportionate or reasonable to impose on this development.

SUMMARY

6.33 To summarise, the proposed development would introduce a new extension to the listed building which would be of high design quality and greatly improve the quality of the residential accommodation. The proposals incorporate excellent sustainability and energy efficiency measures and would not generate any unacceptable noise or vibration impacts.

6.34 Moreover, the new annex would not be taller than the existing closet wing and so would not lead to any material impact on neighbour’s amenity.

6.35 We therefore conclude that the proposals satisfy the relevant planning policy at both the national and local level.

7.0 CONCLUSION

8 GLOUCESTER GATE, REGENT'S PARK, LONDON, NW14HG

CONCLUSION

- 7.1 Montagu Evans have been instructed by Mr Dory Gabbay and Mrs Tamara Gabbay to produce this Planning and Heritage Statement in support of an application for planning permission and listed building consent for works to 8 Gloucester Gate in the London Borough of Camden.
- 7.2 The proposals by Down Farmer Architects have been developed in collaboration with a full, professional consultant team and the Applicant. The purpose of this Heritage Statement has been to assess the impact of the proposed development on the special interest of the Grade I listed building and character and appearance of the Regent's Park Conservation Area. Under paragraphs 199–200 of the NPPF, great weight should be given to the conservation of designated heritage assets even where the harm would be less than substantial, and any harm should require a clear and convincing justification.
- 7.3 From the Courts' interpretation of Section 16(2) and Section 66(1) of the 1990 Act, considerable importance and weight should be given to the desirability of preserving the special interest of listed buildings in any balancing exercise with material considerations which do not have this status.
- 7.4 The considerable importance and weight to the desirability of preservation should tip the scales to produce an unequal balance in its favour. However, the decision-maker should still take account of the scale of change, and so the extent of impact, as well as the relevance to its significance, and the importance of the asset. The overall weight to be given to any harm should be a product of these factors.
- 7.5 There are two principal designated heritage assets in this case: the main house and the CA. Both assets must be assessed individually to inform and calibrate the extent of countervailing public benefits that may be required to outweigh any harm.
- 7.6 In assessing the impact on the listed building, we have concluded there would be a net enhancement to the significance of the asset for reasons set out at **Section 5.0**.

- 7.7 We have identified a low level of less than substantial harm to the listed building derived from the following works:
- 7.7.1 Installation of roof-mounted condenser enclosure to 8 Gloucester Gate;
- 7.7.2 Loss of 19th century fabric and evidential value associated with the rebuilding of the much-altered closet wing;
- 7.7.3 Creation of a double-width opening between the principal rooms at ground floor level;
- 7.7.4 Alterations to planform at second floor level to accommodate the relocation of the secondary staircase;
- 7.7.5 Potential loss of fabric when rebuilding the mews roof to secure its long term future and improve energy efficiency; and
- 7.7.6 The loss of fabric in the creation of two glazed openings within the blind arcade to the rear of mews.
- 7.8 We find no harm to the significance of the CA or nearby listed buildings on account of the fact that the majority of works are internal. The remainder that are external are beneficial as we explain below.

PUBLIC BENEFITS

- 7.9 Paragraph 208 of the NPPF requires a balance in an instance of less than substantial harm to the significance of a designated heritage asset.

DESIGN QUALITY

- 7.10 The first consideration must be that the quality of architecture and design prepared by Down Farmer Architects and Goddard & Studio is of the highest calibre. It would demonstrably uplift the quality of the exterior of the building and to interior by refurbishing in a sensitive manner that will secure the long-term future of this highly graded listed building.
- 7.11 The use and application of materials in the new annex subtle, yet effective in emphasising the historic forms and rich architectural detailing of the existing building. The fine attention to detail is reflected in the submission.

HERITAGE BENEFITS

- 7.12 We consider that the heritage benefits of the proposed development are as follows, and form part of the overall justification of the development:
- 7.12.1 Securing the long-term future and conservation of the listed building through a comprehensive refurbishment and alteration in a single phase;
- 7.12.2 Replacement of the modern stone hallway with a more appropriate design and materiality;
- 7.12.3 Reinstating the original proportions of the opening between the first floor principal rooms;
- 7.12.4 Refurbishment of the principal staircase, and improvements to both the basement and secondary staircases;
- 7.12.5 Scholarly repairs and reinstatement of appropriate decorative plasterwork and joinery throughout the building;
- 7.12.6 The removal of existing fireplaces of varying quality and age, and installation of appropriately detailed fire-surrounds to each of the principal rooms;
- 7.12.7 Replacement of 1980s fabric with appropriately-detailed fixtures, fittings and finishes executed to a high specification;
- 7.12.8 Removal of low-quality 1980s fitted joinery;
- 7.12.9 General improvements to the layout and circulation through the listed building, particularly in relation to the proposed new annex and the mews house; and
- 7.12.10 Positive setting impacts deriving from the high-quality design of the new annex to the rear and the associated landscape improvements to the courtyard.
- 7.13 Taking account of the considerable importance and weight that should be given to the desirability of preserving the special interest of listed buildings, we have found the overall weight to the harm to the significance of the listed building that comprise the Site as being low.

- 7.14 We consider that the heritage benefits of the development are substantive and weighty, and have been arrived at following a detailed and iterative design process.
- 7.15 In our judgement, when the less than substantial harm is weighed against the heritage public benefits of the scheme we consider that the harm would be outweighed.
- 7.16 Nevertheless, if the Council consider there to be 'net harm' then we also reference additional benefits associated with improving the energy efficiency of the building (an important aspiration during a time of climate change).

POLICY COMPLIANCE

- 7.17 Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, development plan forms the starting point for determination of this application.
- 7.18 On account of finding less than substantial harm and undertaking the heritage balancing exercise we find that the proposals accord with the London Plan (2016) Policies 7.4 (local character) and 7.8 (heritage assets and archaeology); London Plan Policy HC1, and Local Plan Policies relating to design (D1, D2 and D3), sustainability (CC1 and CC2), noise and vibration (A4), and Parking (T1 and T2).
- 7.19 Consequently, we consider the development would comply with the policies within the development plan.
- 7.20 On that basis the decision maker is able to discharge their legal duties under Sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

APPENDIX 1: STATUTORY LIST DESCRIPTION

8 GLOUCESTER GATE, REGENT'S PARK, LONDON, NW1 4HG

NUMBERS 2 TO 11 AND ATTACHED RAILINGS

Official list entry

Heritage Category: **Listed Building**

Grade: **I**

List Entry Number: **1078322**

Date first listed: **14-May-1974**

Date of most recent amendment: **22-Dec-2004**

List Entry Name: **NUMBERS 2 TO 11 AND ATTACHED RAILINGS**

Statutory Address 1: **NUMBERS 2 TO 11 AND ATTACHED RAILINGS, 2-11, GLOUCESTER GATE**

This List entry helps identify the building designated at this address for its special architectural or historic interest.

Unless the List entry states otherwise, it includes both the structure itself and any object or structure fixed to it (whether inside or outside) as well as any object or structure within the curtilage of the building.

For these purposes, to be included within the curtilage of the building, the object or structure must have formed part of the land since before 1st July 1948.

[Understanding list entries \(https://historicengland.org.uk/listing/the-list/understanding-list-entries/\)](https://historicengland.org.uk/listing/the-list/understanding-list-entries/)

[Corrections and minor amendments \(https://historicengland.org.uk/listing/the-list/minor-amendments/\)](https://historicengland.org.uk/listing/the-list/minor-amendments/)

Location

Statutory Address: **NUMBERS 2 TO 11 AND ATTACHED RAILINGS, 2-11, GLOUCESTER GATE**

The building or site itself may lie within the boundary of more than one authority.

County: **Greater London Authority**

District: **Camden (London Borough)**

Parish: **Non Civil Parish**

National Grid Reference: **TQ 28600 83368**

Details

798-1/82/569

GLOUCESTER GATE (East side), Numbers 2 to 11 and attached railings.

14.05.74 (Formerly listed as: GLOUCETER GATE Numbers 1 to 11 and attached railings)

GV

I Terrace of eleven houses, now a terrace of ten individual units (with original Nos.1 and 2 combined as No. 2) c.1827. By John Nash, with additions of same period by J J Scoles. Built by R Mott. Stucco with rusticated ground floor. Slate mansard roofs with dormers and large slab chimney-stacks. EXTERIOR: symmetrical composition of three storeys (centre & end houses 4 storeys), attics and basements. Three windows each house. Square-headed doorways with fanlights and panelled doors. Recessed sashes; 1st floor with continuous cast-iron balcony. Ionic pilasters rise through 1st and 2nd floors to support entablature with balustraded parapet screening dormers. String at 1st floor level. Centre house (No.6) with projecting hexastyle Ionic portico, columns rising through the 1st and 2nd floors to support continuous entablature and balustraded parapet screening attic storey. End houses (Nos 2 and 11) with tetrastyle Ionic porticoes, columns rising through 1st and 2nd floors to support continuous entablature and balustraded parapet screening pedimented attic storey. Pediments with Classical figure acroterion and tympana filled with wreaths and scrolls. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with pineapple finials to areas.

(Survey of London: Vol. XIX, Old St Pancras and Kentish Town (St Pancras II): London: -1938: 98).

Listing NGR: TQ2860083377

Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number: **477241**

Legacy System: **LBS**

Sources

Books and journals

'Survey of London' in Old St Pancras and Kentish Town The Parish of St Pancras Part 2: Volume 19 , (1938), 98

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.



Map

This map is for quick reference purposes only and may not be to scale. This copy shows the entry on 17-Dec-2023 at 17:15:37.

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End of official list entry

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