

Delegated Report		Analysis sheet		Expiry Date:	06/06/2024
		N/A		Consultation Expiry Date:	10/06/2024
Officer			Application Number(s)		
Adam Greenhalgh			2024/3349/P & 2024/3387/L		
Application Address			Drawing Numbers		
8 Gloucester Gate London NW1 4HG			See decision notice		
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature		
Proposal(s)					
Various alterations to dwelling house and mews including replacement of the rear, closet wing extension, rebuilding of mews roof, internal refurbishment consisting of demolition and reposition of some partition walls and other associated works.					
Recommendation(s):		Refuse planning permission and Listed Building Consent			
Application Type:		Full planning permission and Listed Building Consent			
Conditions or Reasons for Refusal:		Refer to Decision Notice			
Informatives:					
Consultations					
Adjoining Occupiers:		No. of responses	00	No. of objections	00
Summary of consultation responses:		Site notice: displayed 21/09/2024 expiry 15/10/2024 Press notice: published 22/08/2024 expiry 15/09/2024 No neighbour responses have been received to date.			
Regent's Park Conservation Area Advisory Committee		An objection was received from the Regent's Park Conservation Area Advisory Committee. Their concerns can be summarised as follows (split into issues concerning the rear wing and mews house for simplicity): <u>Alterations/extension to rear wing:</u> - The proposed rear addition/annex has a form that is alien to the Grade I Listed buildings, and is disproportionate to the heritage assets. As a result it is over-dominant in terms of the heritage assets to which it should be subordinate.			

- Extending the annex closer to the rear elevation of the mews house would excessively dominate the mews house and disrupt the balance between the three main masses of building (the main house, the mews house, and the rear addition/annex).
- The disproportionate character of the proposed annex is exemplified by the heavy detailing represented by the triple height soldier courses which are alien and clumsy in this context.

Alterations to mews house:

- The removal of the blind brick arches in the rear elevation to the mews house and their replacement with windows is wholly alien to the architectural expression of the surviving and original forms. The blind arches represent the screening of the mews to maintain subordination. The current application would substantially harm that critical architectural distinction, destructively subverting the architectural distinctions between the elements of these groups of buildings – important aspects of the special architectural character of the Grade I Listed buildings.
- The proposed destruction of internal divisions in the mews house would disrupt the internal proportions and forms of the mews house, significantly harming its character.. Whilst acknowledged that the partitions have been altered over time, the cellular pattern of subdivision has been retained and should be conserved. The ‘open plan’ now proposed would be destructive of the surviving cellular pattern which is characteristic of the distinctive subordinate service character of the mews house.
- All altered details, such as replacement doors, should be subject to approval of materials and details by condition

Officer response: See ‘Design and heritage’ section below.

Site Description

The site is a Grade I listed building within a GI listed terrace. The terrace sits within the Regent’s Park Conservation Area and is in the setting of the GI Regent’s Park Registered Landscape. In terms of designation, it is therefore of the highest national significance. The significance of the property itself is high. Although converted to flats in the 1930s it was restored back to a house in the 1980s and the survey drawings from the 1980s show that it appears to have suffered very little loss of historic fabric in the C20th, retaining much of its historic fabric and planform internally, unlike other terraces in Regent’s Park. Its significance includes its architectural design and materials, planform, evidential value as an early C19th terrace house (with façade to the design of Nash), group value with other C19th buildings in the Regent’s Park and its associative and compositional value with the Regent’s Park planned landscape. On a local level it is a positive contributor to the character and appearance of the conservation area.

Relevant History

Application site

8770103 – External and internal alterations including the demolition of the existing rear extensions to nos.8 and 9. **Approved on 14/10/1987.**

8700584 – Erection of a single-storey rear extension at first-floor level at the rear of nos.8 and 9 and change of use of no.9 from office to residential. **Approved on 14/10/1987.**

Neighbouring property – 10 Gloucester Gate

2016/3706/P – External alterations to dwelling house and mews building (Class C3) including demolition and replacement of the two storey rear extension and other external works. **Approved 16/12/2016.**

2016/4064/L – Various alterations to dwelling house and mews including replacement of the rear extension, mews roof rebuilt and alterations to fenestration, internal refurbishment consisting of demolition and reposition of some partition walls and other internal alterations. **Approved 19/12/2016.**

Relevant policies

National Planning Policy Framework 2024

The London Plan 2021

Camden Local Plan 2017

- Policy A1 Managing the impact of development
- Policy D1 Design
- Policy D2 Heritage
- Policy CC1 Climate change mitigation
- Policy CC2 Adapting to climate change

Camden Planning Guidance (CPG)

- CPG Home Improvements (2021)
- CPG Amenity (2021)
- CPG Design (2021)

Regent's Park Conservation Area Appraisal and Management Strategy 2011

Assessment

1.0 Proposal

1.1 The replacement 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 main house, including improvements to the extant planform arrangement and sensitive restoration of period features; and 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.

2.0 Assessment

The material considerations for this application are summarised as follows:

- Design and heritage
- Amenity of neighbouring residential occupants
- Sustainability

3.0 Design and heritage

- 3.1. Local Plan policies D1 (Design) and D2 (Heritage) are aimed at achieving the highest standard of design in all developments. Policy D1 requires development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.
- 3.2. Within the Heritage section of the Design CPG it is noted that development within Conservation Areas should preserve and where possible enhance the character and appearance of the area. In assessing applications for listed building consent the Council has a statutory duty 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. We will consider the impact of proposals on the historic significance of the building, including its features, such as: original and historic materials and architectural features; original layout of rooms; structural integrity, and character and appearance.
- 3.3. An application for planning and listed building consent was granted at Number 10 Gloucester Terrace under 2016/4064/L and 2016/3706/P on 19/12/2016 for works similar to those proposed within these applications. Historic England was consulted on the proposals at pre-application and application stage and raised a number of objections to the works including the demolition of part of the rear closet wing, the reconfiguration of the staircase, the alterations to ground floor plan form, the form, scale and design of the proposed rear extension.
- 3.4. Several of these matters were addressed by revisions during the course of the application. The final communication on that application from Historic England instructed the Council that the works were still harmful vis: "the major outstanding feature which remains a concern is the architectural form of the extension. We identified at an early stage that the bowed shape of the new building contrasts harmfully with the orthogonal geometry and classical architecture of the listed building."

External Works

Rear extension

- 3.5. It is proposed to demolish the existing rear closet wing extension and replace it with a new

extension. The demolition of what remains of the C19th part of the rear closet wing is very difficult to support. Whether dating from the very first contract or at some point post-occupation, it is clear that a closet wing has served the house since at least the mid-C19th if not earlier (very few general London maps showed closet wings until the Ordnance Survey, and Nash and Pennethorne often didn't include them on ground-plans either as they fell outside their contracts). It is clearly part of the evidential value of the house and although extended and altered in the 1980s, these alterations did not remove it entirely but rather took their scale, FTC heights, detailed design, form, and materials from the historic fabric to which they were attached, resulting in a sympathetic addition to the property.

- 3.6. Notwithstanding the issue of demolition of historic fabric and the resultant loss of evidential value, the proposed design of the replacement extension must be considered in terms of its impact on the significance and setting of the listed building. It is a two-storey bowed form rising from a basement level to two storeys above ground at the main yard level.
- 3.7. The resultant building is architecturally resolved, but that is partly why it is harmful. Closet wings typically form either miniaturised versions of the rear elevation or take on an even more ad-hoc appearance which is commensurate with their ancillary use to the main house. In this instance the replacement extension is essentially a new pavilion within the rear yard and its façade reads as almost entirely independent of the main house or the mews building. It harms the setting and significance of the main house due to the loss of the surviving elements of the historic closet wing, the scale, massing, form and design of the replacement building, the loss of hierarchy and ancillary spatial quality of the rear yard, the loss of a mitigating scale between the main rear elevation and the mews building, and the visual impact of the proposed building on what remains of the historic outlook from the rooms within the main house.
- 3.8. It was advised at pre-application stage that options exploring other means of extending the existing closet wing should be examined as it may be possible to increase the floor space of the rear extension without causing harm. It appears that an option which would not cause harm is potentially achievable; the extension of the 1980s part of the closet wing by a small bow (described as the "round bay extension" option in the pre-application documents). This would potentially represent a form of development which would act in favour in terms of the impact on the special architectural and historic significance of the main house.

Mews building:

- 3.9. It is proposed to alter the length of the first floor front window openings to the front elevation of the mews. The window openings in the mews are of various lengths and it is clear that many were introduced or reinstated in the 1980s, including at the mews to Number 8. Creating more uniformity across the first floor of the mews is not of any benefit since it is highly unlikely a uniform appearance was ever the case and slightly lowering the window openings (which have concrete cills and are 1980s frames) is unlikely to be seen as causing harm.
- 3.10. It is proposed to install a rooflight similar to that consented at Number 10. This would involve the loss of the ridge of the roof. It is unquestionably harmful. There is no in principle objection to the better top-lighting of the mews building, such as by the better configuration of conservation-style rooflights on the yard-side slope of the roof, however the current proposal is not acceptable and therefore not supported. .
- 3.11. It is proposed to open the blind Roman arches which decorate the wall separating the mews from the house. These appear to have been altered by unsympathetic opening at some point in the C20th and were restored to their blind form as part of the 1980s restoration of the property. It is noted that in some of the adjacent properties a Diocletian window/fanlight exists

at the top of the arches which seems a convincing detail, although possibly not historic. However the complete opening of the arches is certainly harmful since their entire point is to articulate a screen to the mews from the rooms of the main house.

Internal works:

Basement:

- 3.12. There is no objection to the relocation of the connection between the basement of the main house and the mews. This part of the planform has already been altered and an opening already exists, so the impact of the work would essentially be neutral.
- 3.13. There is no objection to the remodelling of the interior of the basement outside the envelope of the original house. This is an entirely C20th space and internally it has no significance. However, at pre-application stage it was advised the elevation of this space should not be entirely glazed as it would result in a very uncharacteristic solid-to-void ratio when seen from the main house. The proposed glazing of this space is still essentially full-height and much greater in extent than the existing traditional French window arrangement. The character and visual spatial hierarchies between the basement extension and the historic part of the basement are therefore compromised by the proposed works.
- 3.14. The proposed creation of an ensuite in the front basement room harmfully affects its historic proportions and results in a wall directly abutting the chimneybreast. It also results in the door into the front room opening directly opposite the chimneybreast which is highly uncharacteristic of a C19th planform and circulation.
- 3.15. The creation of the boot room area is not considered to be harmful.

Ground Floor:

- 3.16. It is proposed to create an opening between the front and rear rooms in the spine wall. It seems very unlikely there would have been an opening here originally because the wall forms the back of the dining room buffet recess and the rear room was almost certainly the morning room or breakfast room with no need for inter-connection with the dining room. However, the detailing of the opening is acceptable and the wall dates from the 1980s, so the impact of this is not considered to be unsupportable in its own right.
- 3.17. The plans indicate the rear room door to be fixed shut. There is no objection to this providing it remains legible on both sides.
- 3.18. The front room chimney piece appears to be of a typical design for the William IV period. In fact, all of the chimney pieces in the house seem to be C19th in appearance (the first floor possibly mid-C19th). Chimney pieces throughout are dealt with later on in this assessment.

First Floor:

- 3.19. This opening was reduced in the 1980s (the extent of the reduction is clear from the joinery and from the 1980s drawings). There is no objection to the opening being made wider as per the pre-1980s extent, providing all of the details are acceptable in terms of double doors, architraves, etc.

Second Floor:

- 3.20. Consent will not be given for the relocation of the spine wall to the front room. The middle and

rear room have undergone more alteration over time and modifications to the arrangement of those spaces are supportable.

- 3.21. It is proposed to reverse the run of the upper flight of the stairs. The existing run seems to be entirely as one would expect given the arrangement of other houses of approximately the same period, and in order to support a reversal of this there would need to be evidence that the original direction was different to the existing. In connection with this, it is proposed to open the linen cupboard arch. If the stairs are in their original run then the linen cupboard must also be in its original location (the 1980s drawings state “restore cupboard”) which would preclude its being opened. In the absence of historic evidence that the stairs ran in the opposite manner it is considered that the linen cupboard arch should be retained in situ.

Third Floor:

- 3.22. Providing the chimney pieces are retained, the third floor is capable of reconfiguration as shown without harm being caused.

Roof:

- 3.23. At pre-application stage it was advised that it is likely that a degree of top-lighting via very modest conservation roof lights could be provided to the core bathrooms, dependant on the impact on the roof structure. Historic aerial photographs from the 1930s-1940s seem to indicate that a dormer of the current type has been extant at Number 8 since at least the 1930s. It is noted that Numbers 5 and 7 have been top lit historically, but that is because there was no other way of lighting their staircase as they rise in the core. It seems likely that Number 8 had no roof lighting when built (in common with most early C19th London stairs of this configuration) and then it was introduced via the dormer in the later C19th or when the building was converted to flats. The construction of the proposed roof light seems likely to involve the loss of roof timbers which may be original to the early C19th; the application provides no further assessment on the impact of this.

Mews:

- 3.24. It is proposed to reconfigure the internal plan form of the mews. It is clear that all of the interior fabric of the mews dates from the C20th. The existing configuration is likely close to what the original planform must have been (stable/coach at ground with hay, bedroom, and tack above).
- 3.25. The Conservation Area Advisory Committee has objected to the impact of the internal reconfiguration of the mews in terms of the spatial hierarchy and character of the site as a whole. That concern is fully understood and appreciated. The open planform would appear to be at odds with the historic cellular planform. However, the existing cellular planform is a result of the 1980s conversion so the proposed works aren't actually demolishing historic fabric and on its own, this element does not result in the loss of historic fabric.
- 3.26. Air conditioning is proposed in several spaces. Some of the visual impact of this (such as having a semi-open cornice) causes visual disruption to the character of historic spaces.

General decorations and refurbishments:

- 3.27. There is no objection to greening of the courtyard.
- 3.28. There is no objection to the sort of refurbishment that would ordinarily fall outside of listed building consent (painting/papering/upholstery and the re-provision of sanitary ware, kitchen

cabinets, etc).

- 3.29. There is no objection to the removal of recessed downlights to the main house (in fact they should be removed as they appear to be unconsented).
- 3.30. A survey of the plasterwork and running joinery has been undertaken in order to support the case for partial replacement. There is no objection to this element of the works as the evidence supplied demonstrates why this fabric is modern in date, and the proposed replacements are in most instances very visually similar or more appropriate.
- 3.31. There is no objection to the replacement of the hall floor. The provision of underfloor heating/timber over-boarding to floors would be achievable without undue disruption to historic fabric or the proportion of the spaces affected.
- 3.32. The chimney piece assessment seems predicated on the fact that any chimneypiece which has been raised to accommodate a modern raised hearth cannot be historic, which is not self-evident. Even if it can be proven that the vast majority of the chimneypieces are 1980s reproductions, almost every chimneypiece in the building is closer in appearance to the typical details of the terraced house interiors of Nash/Pennethorne and other developers of the period than the examples proposed, which are clearly derived from the more idiosyncratic works of John Soane. In fact at least one of the chimneypieces in the building (front ground floor room) is almost identical to another in terrace which was noted as being an original Nash chimneypiece in a 1938 survey. As such, the replacement of chimneypieces would not be supported.

Public benefits and balancing of “less than substantial harm”

- 3.33. The applicants contend that although the proposals do not in their view constitute any harm, should harm be found, there are public benefits to outweigh that harm.
- 3.34. In summary these are set out as being:

Design Quality

- 1. 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 its interior by refurbishing in a sensitive manner that will secure the long-term future of this highly graded listed building.*
- 2. The use and application of materials in the new annex are 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

- 1. We consider that the heritage benefits of the proposed development are as follows, and form part of the overall justification of the development:*
- 2. Securing the long-term future and conservation of the listed building through a comprehensive refurbishment and alteration in a single phase;*
- 3. Replacement of the modern stone hallway with a more appropriate design and materiality;*
- 4. Reinstating the original proportions of the opening between the first floor principal rooms;*

5. *Refurbishment of the principal staircase, and improvements to both the basement and secondary staircases;*
 6. *Scholarly repairs and reinstatement of appropriate decorative plasterwork and joinery throughout the building;*
 7. *The removal of existing fireplaces of varying quality and age, and installation of appropriately detailed fire-surrounds to each of the principal rooms;*
 8. *Replacement of 1980s fabric with appropriately-detailed fixtures, fittings and finishes executed to a high specification;*
 9. *Removal of low-quality 1980s fitted joinery;*
 10. *General improvements to the layout and circulation through the listed building, particularly in relation to the proposed new annex and the mews house; and*
 11. *Positive setting impacts deriving from the high-quality design of the new annex to the rear and the associated landscape improvements to the courtyard.*
 12. *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.*
 13. *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.*
 14. *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.*
 15. *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).*
- 3.35. In terms of design quality, it is not disputed that the proposed structure lacks quality of detail or materials. However, the proposal does not preserve the special historic and architectural interest of the listed building. It involves the demolition of what remains of the historic closet wing and results in a building the scale and form of which does not reflect the evidential or architectural value of the closet wing.
- 3.36. In terms of the heritage benefits set out above, the Council either disputes that some of these are benefits and notes that those which are benefits do not require, or are the direct result of, the harm which has been identified. All of the proposed agreed benefits could be delivered without any of the harm. And even without any of the proposed heritage benefits, the building would still fully merit its GI listing and maintain its national and local significance.
- 3.37. Ultimately the proposed works must be assessed in terms of their cumulative impact on the significance of the listed building. The significance of the building primarily lies in its special architectural and historic interest as an 1820s terraced house to a general design by John Nash. Some of that character has been altered or replicated over the course of the C20th but it remains the prevailing character of the building. The proposed works would not drain away all of that character, but they would deplete it. The proposed works do present some benefits. Some of these are removing harmful works (but these are generally items which are in any

case unlawful, such as the recessed spotlights). Some of the most beneficial work is actually where there is like-for-like repair and general maintenance, which arguably would not require consent anyway. None of the proposed benefits are contingent on the harm proposed, nor are they especially necessary given the building is already a GI listed house in reasonable order.

- 3.38. The proposed works cause less than substantial harm to the special architectural and historic interest of the building. There are no public benefits of a nature adequate to outweigh the level of harm caused.

In respect of Planning Permission 2024/3349/P

- 3.39. Section 72(1) of the Listed Buildings Act 1990 directs that in the exercise of various functions under the Planning Acts in relation to land in conservation areas (including determination of planning applications) the Council is required to pay special attention to the desirability of preserving or enhancing the character and appearance of the Conservation Area. The proposed works would fail to preserve the character and appearance of the Conservation Area. This would be largely confined to private views, but such views are nonetheless within the Conservation Area.
- 3.40. Section 66(1) of the Listed Buildings Act 1990 directs that in considering whether to grant planning permission for development which affects a listed building or its setting, the Council is required to have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses. The proposed works would fail to preserve the setting and some features of special architectural and historic interest which the building currently possesses.

In respect of Listed Building Consent 2024/3387/L

- 3.41. Section 16(2) of the Listed Buildings Act 1990 (Planning (Listed Buildings and Conservation Areas) Act 1990) In considering whether to grant listed building consent for any works, the Council is required 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. The proposed works would fail to preserve the setting and some features of special architectural and historic interest which the building currently possesses.

- 3.42. The NPPF directs:

208. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

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

- 3.43. The significance of the asset is very high (GI listed). Not every element of the building is of the highest significance, but the vast majority of its fabric and general character and appearance combines to contribute to its special architectural and historic interest. It is also part of the group value and setting of neighbouring GI listed buildings as well as being part of the nationally significant Regent's Park development (as designed by Nash). The site is also within the Regent's Park Conservation Area to which it makes a positive contribution of the

highest degree.

- 3.44. The proposed works would cause less than substantial harm to the significance of the listed building, and to its otherwise positive contribution to the setting of neighbouring listed buildings and the character and appearance of the conservation area. The proposal does not present public benefits of a nature adequate to justify the degree of harm caused. The asset is currently within its optimum viable use.

4.0 Amenity of neighbouring residential occupants

- 4.1. Policy A1 (Managing the impact of development) seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. It seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for development that would not harm the amenity of neighbouring residents. This includes privacy, overlooking, outlook and implications on daylight and sunlight. CPG - Amenity provides specific guidance with regards to privacy, overlooking and outlook.
- 4.2. The proposed three storey rear wing would be the same height as the existing three storey rear wing. It would not obscure or overshadow any windows or private external amenity areas at any neighbouring properties. The extension would project further to the east (towards no. 9). However, as this would be towards the solid flank elevation of the three storey rear wing at this site and the proposal would sit below the upper floor windows in the rear elevation of the main building at 9 Gloucester Gate, there would be no significant loss of light.
- 4.3. Due to the siting, below the windows on the upper floors of the neighbouring properties, there would be no loss of outlook for these rooms. They would retain the same open aspect to the rear.
- 4.4. The new three storey rear wing and link to the mews house at the rear would be next to 4 Gloucester Gate Mews. There is a gap between the rear wing at the site and the mews house at the rear. This would be filled by the proposal. However, as this gap only measures 1.5m in depth, and it is located to the side of the window to the rear of 4 Gloucester Gate Mews, there should not be any undue loss of light or outlook at this site.
- 4.5. The proposed Gloucester Gate Mews elevation appears to show the window on the second floor at the rear of the main building at the same level as the flat roof of the proposed three storey rear wing. While the sectional drawings indicate railings 'for maintenance purposes only' it is considered that, if planning permission were to be granted, a condition to prevent the use of the roof of the three storey wing as a terrace, for amenity purposes, would need to be attached (to prevent undue overlooking of the neighbouring rooms, terraces, and patios). Subject to such a condition, the proposals would not result in any undue harm to the living conditions of any neighbouring occupiers.

5.0 Sustainability

- 5.1. In accordance with Policy CC2 (Adapting to climate change) of the Local Plan, the Council discourages active cooling, and developments should instead minimise use of energy and employ passive design measures to regulate temperature. Air-conditioning units are only permitted where thermal modelling demonstrates that there is a clear need for it after all preferred measures are incorporated in line with the London Plan cooling hierarchy. In addition, passive measures should be considered first. If active cooling is unavoidable, applicants need to identify the cooling requirement and provide details of the efficiency of the system.
- 5.2. The Overheating Assessment which has been undertaken has not fully considered all options on the cooling hierarchy including:

- Internal and external shading – particular the existing areas with historic windows which will not be replaced with low G value glazing and on the West façade.
- Fans / Ceiling fans
- MVHR
- Larger secure window openings to allow night-time ventilation

5.3. Shading and lower G value glazing was dismissed due to ‘heritage constraints’ but no evidence of discussion with conservation officers regarding this matter was noted. Internal shading is usually acceptable and would likely to only be restricted for interiors of exceptional architectural quality (such as the finest state rooms of a great house) and therefore should be modelled in the existing areas unless restricted. Historic England Guidance, on adapting historic buildings, notes:

- “Installation of external awnings, blinds and shutters to reduce overheating, where they do not adversely impact on the architectural interest of the building, or group of buildings.” (Page 34)
- “The use of slim-profile or vacuum double-glazing can allow the installation of double-glazing in historic buildings alongside the retention of existing window frames” although it should be noted that “Exceptions in which such installations are unlikely to be acceptable will include windows which retain historic glass of interest, windows of historic or architectural interest whose frames / glazing bars cannot support slim-profile or vacuum double-glazing, and windows with leaded lights.” (Page 25)

5.4. The applicant has not provided sufficient evidence to demonstrate that all preferred measures within the cooling hierarchy have been reviewed against the criterion (as required by CPG Energy Efficiency) and incorporated into the host building. The applicant has not provided a thermal modelling or overheating analysis to demonstrate that there is a clear need for the proposed units. Due to the lack of the aforementioned information, the Council cannot be satisfied that the proposed works are necessary and that appropriate climate adaptation measures to reduce the impact of urban and dwelling overheating could not be achieved by other preferred measures as set out in the cooling hierarchy.

6.0 Conclusion

With regards to application 2024/3349/P:

1. The proposed demolition of the existing closet wing, by reason of the loss of historic fabric and associated evidential value, would be harmful to the special architectural and historic interest of the Grade I listed host building and its setting, the setting of its curtilage building and the setting of adjacent Grade I listed buildings. As such the proposal would be harmful to the character and appearance of the Conservation Area contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.
2. The proposed rear extension, by reason of its height, bulk, mass, form, modelling and detailed design would be harmful to the special architectural and historic interest of the Grade I listed host building and its setting, the setting of its curtilage building and the setting of adjacent Grade I listed buildings. As such the proposal would be harmful to the character and appearance of the Conservation Area contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.
3. The proposed alterations to the mews building, by reason of their detailed design, would be harmful to the special architectural and historic interest of the Grade I listed host building and its setting, the setting of its curtilage building and the setting of adjacent Grade I listed buildings. As such the proposal would be harmful to the character and appearance of the

Conservation Area contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.

4. The proposed alteration of the upper staircase flight, the proposed roof light, the replacement chimney pieces and the alterations to the basement planform, by reason of the loss of evidential value, and the introduction of less appropriate designs, would be would be harmful to the special architectural and historic interest of the Grade I listed host building. As such the proposal would be harmful to the character and appearance of the Conservation Area contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.
5. In the absence of adequate dynamic thermal modelling to demonstrate the need for active cooling equipment, the Council cannot be satisfied that the proposed works are justified and that appropriate climate adaptation measures to reduce the impact of urban and dwelling overheating could not be achieved by other preferred measures as set out in the cooling hierarchy. The proposal is therefore contrary to policy CC2 (Adapting to climate change) of the London Borough of Camden Local Plan 2017

With regards to application 2024/3387/L:

1. The proposed demolition of the existing closet wing, by reason of the loss of historic fabric and associated evidential value would be harmful to the special architectural and historic interest of the Grade I listed host building contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.
2. The proposed rear extension, by reason of its height, bulk, mass, form, modelling and detailed design would be harmful to the special architectural and historic interest of the Grade I listed host building contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.
3. The proposed alterations to the mews building, by reason of their detailed design, would be harmful to the special architectural and historic interest of the Grade I listed host building contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.
4. The proposed alteration of the upper staircase flight, the proposed roof light, the replacement chimney pieces and the alterations to the basement planform, by reason of the loss of evidential value, and the introduction of less appropriate designs, would be would be harmful to the special architectural and historic interest of the Grade I listed host building contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.

7.0 Recommendation

- 7.1. Refuse planning permission and Listed Building Consent