

APPENDIX 1.0

LBC PRE-APPLICATION

RESPONSE (9TH MAY 2024)

Date: 09/05/2024

Our ref: 2024/0371/PRE
Contact: Alex Kresovic
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www.camden.gov.uk/planning

Dear Mr. Gareth Fox,

Re: 8 Gloucester Gate, London, NW1 4HG

Thank you for submitting a pre-planning application enquiry for the above site which was received on 31/01/2024 together with the payment of £1,920.26 which was received on 02/02/2024. The advice is based on the information provided by yourself which includes a pre-application planning and heritage statement dated December 2023, pre-application design document, and structural drawings.

Development Description

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.

Planning 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 properties

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 within this pre-application scheme.

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 planform, the form, scale and design of the proposed rear extension.

Several of these matters were addressed by revision in 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.”*

From the documents on file, it is unclear what public benefit was identified in the decision to approve the above application.

Site description

The site is a Grade I listed building within a Grade I listed terrace designed by John Nash (1762-1836) and built around 1827 on the north-eastern side of Grade I registered Park and Garden of Regent's Park.

The terrace sits within the Regent's Park Conservation Area and is in the setting of the Grade I 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.

Assessment

The main issues for consideration are:

- Design and Heritage
- Amenity
- Quality of Accommodation
- Transport
- Sustainability

Design and Heritage

The application site is a Grade I listed building and is located within the Regent's Park Conservation Area, wherein the Council has a statutory duty to pay special attention to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses, and to preserve or enhance the character or appearance of the Conservation Area, in accordance with Section 16, Section 66 and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) as amended by the Enterprise and Regulatory Reform Act 2013.

Local Plan Policy D1 Design seeks to secure high quality design in development. The Council expects excellence in architecture and design. 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 and listed buildings.

Impact of Proposed Works on Significance

External Works

Rear extension: 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. 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. The proposed demolition of what remains of the C19th part of the rear closet wing and replacement extension, in its current form, is very difficult to support.

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 grade at the main yard level.

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. Therefore, harming 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.

It has been advised that options exploring other means of extending the existing closet wing are 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). The pre-application documents note that one of the drawbacks of this is the "piecemeal" nature of the addition, but this is precisely the quality which is considered to act in its favour in terms of the impact on the special architectural and historic significance of the main house.

Any such scheme put forward to Council shall reduce the amount of glazing proposed and incorporate a cill height of at least 800mm high to the lower ground floor part of the scheme. It is also encouraged that further investigation work is carried out to determine whether brick columns can be incorporated. This would ensure the existing brick can be retained/reused accordingly and the glazing proportions are minimised.

While details such as bricks, paving, frames etc.. could normally be assessed by condition, here the very acceptability of the proposal depends on the details. Therefore, it is requested that this detail is provided during the assessment stage of the application, rather than a condition on a planning permission / listed building consent.

Mews Building

It is proposed to slightly 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, but slightly lowering the window openings (which have concrete cills and are 1980s frames) is unlikely to be seen as causing harm.

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.

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: 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.

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, 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 re-alignment of the front basement room wall seems unlikely to be acceptable as it is currently in the position it would be expected to be in (i.e. slightly in advance of the rear room corridor wall). However investigative works are ongoing to establish the date of this fabric.

There is no objection to the creation of a boot room and ensuite, W.C. and utility room.

Ground Floor: 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. If the wall is proven to be obviously modern in its fabric, then an opening could be acceptable, but it will be entirely contingent on evidence for the date of the wall affected.

The plans indicate the rear room door to be fixed shut. There is no objection to this providing it remains legible on both sides.

The front room chimneypiece appears to be historic. In fact, all the chimneypieces in the house seem to be C19th (the first floor possibly mid-C19th). Consent for the removal of any chimneypiece will not be given, and consent for replacement could only be given if the chimneypiece proposed for removal can be shown to be a later addition and the proposed replacement is closer to a known historic survival in an equivalent room elsewhere in the terrace.

First Floor: It is proposed to enlarge the existing opening between front and rear rooms. 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 details are acceptable in terms of double doors, architraves etc.

Second Floor: 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.

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. If there is historic evidence that the stairs ran in the opposite manner then the arch could be opened provided it is demonstrated that the infill is made of plasterboard and not lathe and plaster, pine boards, or some other C19th material.

Third Floor: Providing the chimneypieces are retained the third floor is capable of reconfiguration as shown without harm being caused.

Roof: 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. It is unclear from when the existing dormer dates and more evidence will be needed to ascertain whether its alteration could be acceptable because a dormer of the same size appears on photographs from the 1940s and that section and plane of the roof doesn't appear to have been included in either the existing or proposed drawings from the 1980s. 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 1930s. I note that the application refers to Number 5 and 7 having 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. But without evidence of the date of the dormer it is difficult to assess whether or not it could be acceptably altered.

Mews: It is proposed to reconfigure the internal planform 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), but there is no objection to the mews being re-configured internally providing it does not cause harm to the parts of the external appearance of the building which retain a sense of historic character.

General decorations and refurbishments

There is no objection to greening of the courtyard, and it would be unlikely to require listed building consent.

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).

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).

It is understood that a survey of plasterwork is being undertaken. If this is to establish whether or not it is original to the C19th Council will need evidence to support that, likewise the joinery.

The introduction of full-scale panelling and beading etc into historic rooms is very difficult to support unless there is evidence it ever existed previously. The illustration given in the interiors document is actually from Repton book illustrating that panelling was considered to be out of fashion in the 1820s. If any of the existing walls are lath and plaster then it is unlikely that consent for panelling or beading can be granted. Papers emulating panelling would not require listed building consent.

There is no objection to the replacement of the hall floor providing there is evidence the existing finish dates from the late C20th. The provision of underfloor heating/timber overboarding to floors will be dependent on the usual criteria (i.e. no alteration to skirtings, doors etc and the reversibility of the alteration).

NOTE: Any design amendments will be further considered by the Council's Conservation & Design Teams and further comments and amendments which may be necessary will be conveyed when amended/application drawings are received.

Amenity

Local Plan Policy A1 and CPG Amenity seek to ensure that the amenity and quality of life of occupiers and neighbours is protected including privacy, outlook, artificial lighting levels, sunlight, daylight, and overshadowing. The Council will only grant planning permission for development which does not cause harm to the amenity and living conditions of neighbouring occupiers.

The proposed development is unlikely to lead to a significant loss of outlook or sunlight/daylight from primary habitable rooms of neighbouring properties due to the structure, in its current form. However, the scale of the proposal is to be further investigated by way of a daylight/sunlight report to determine if any such adverse impacts exist, as the current documentation does not provide sufficient information to provide an accurate assessment.

Quality of Accommodation

Policy D1 (n) and CPG Interim Housing require development to provide high quality housing that provides secure, well-lit accommodation that has well designed layouts and rooms. The Council uses the Nationally Described Space Standards for proposals for new houses and expect any such residential development to fully comply with the Nationally Described Space Standards.

The proposal, in its current form, would well exceed the national space standards in terms of overall GIA and provide sufficient outdoor amenity space.

Transport

In line with 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.

In accordance with Policy T2 of the Camden Local Plan, all new residential development should be secured as on-street residents parking permit (car) free by means of a Section 106

Agreement. This will 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. Notwithstanding, should existing residents return to the redeveloped property and sufficient evidence is provided to demonstrate this, there would be no car-free obligation, but the Council will seek the inclusion of a mechanism that prohibits future occupiers from obtaining parking permits.

Given the scale of the proposal, the Council may seek to secure a Construction Management Plan and associated Implementation Support contribution and Impact Bond by means of the Section 106 Agreement. This will be determined at application stage.

Sustainability

Applicants are expected to submit sustainability proposals either within a dedicated section of the DAS or in a separate statement - the detail of which to be commensurate with the scale of the development demonstrating how the development will:

- Implement the sustainable design principles as noted in policy CC2 and CPG Energy efficiency and Adaptation.
- CPG Efficiency and Adaptation should be consulted and GLA guidance on preparing energy assessments may be followed.
- Camden's Local Plan (section referring to CC1) requires all developments to achieve incorporate renewables wherever feasible.

All new developments will be expected to submit a statement demonstrating how the London Plan's 'cooling hierarchy' has informed the building design, especially if active cooling is proposed. Any development that is likely to be at risk of overheating will be required to complete dynamic thermal modelling to demonstrate that any risk of overheating has been mitigated.

In England, BNG is mandatory from 12 February 2024 under [Schedule 7A of the Town and Country Planning Act 1990 \(as inserted by Schedule 14 of the Environment Act 2021\)](#). Developers must deliver a BNG of 10%. This means a development will result in more or better quality natural habitat than there was before development.

Recommendations

It is considered that the proposal, in its current form, cannot be supported in its entirety however, the scheme does have components which ultimately is supported in principle. Therefore, it is strongly encouraged that the proposal is revisited with the above comments taken on board, prior to any such application submission to Council.

On the basis of the works shown in the pre-application documents Planning Permission will be required, alongside a Listed Building Consent application.

The Council has published a new [Draft Camden Local Plan](#) (incorporating Site Allocations) for consultation (DCLP). The DCLP is a material consideration and can be taken into account in the determination of planning applications which has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

Should you choose to submit a planning application and listed building consent application which addresses the outstanding issues detailed in this report satisfactorily, it is advised you submit the following:

- Completed form – Full Planning Application form & Listed Building consent Application

- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section and elevation drawings (where existing and as proposed) of any window and joinery alterations at an appropriate scale
- Design and Access Statement
- Heritage Statement
- Daylight and Sunlight Assessment
- Materials Schedule
- Sustainability Statement
- The appropriate fee

Council is legally required to consult on applications with individuals who may be affected by the proposals and for all works to a GI listed building including consultation to Historic England. We would put up a notice on or near the site and advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received. You are advised to contact your neighbours prior to submission, to discuss the proposals.

Non-major applications are typically determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers. For more details [click here](#).

This is a proposal relating to almost every room of a substantial listed house and failure to mention any specific detail in this advice must not be taken to construe acceptability of that detail.

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and is not binding upon the Council.

Please also note: This letter also closes this pre-application enquiry. Any further enquiry will have to be undertaken separately with the appropriate fee being required for a 'follow-up' enquiry.

Thank you for using Camden's pre-application advice service.

Yours sincerely,
 Alex Kresovic
 Principal Planning Officer
 Planning Solutions Team