

21 Park Square East

London

NW1 4LH

To support Listed Building and Planning Applications for the installation of a Comfort Cooling System and Aerial Systems.



15 August 2014

GRANT AUDLEY-MILLER MA Oxf, DipTP, MRTPI, IHBC

21 Park Square East, London, NW1 4LH

1. Introduction

This statement has been prepared by Grant Audley-Miller, MA Oxf, DipTP, MRTPI, IHBC, for Mrs Dzhansari Umarova. The purpose of the statement is to assess the impact of the proposal for the installation of a Comfort Cooling System and Aerial Systems at 21 Park Square East, London in accordance with the requirements of para. 128 of the National Planning Policy Framework (NPPF).

My advice is made solely on the basis of the heritage issues. These are the impact of the proposal on No 21 Park Square East which is included in the List of Buildings of Special Architectural or Historic Interest and the Regent's Park Conservation Area and the adjacent listed buildings.

My competence for undertaking the work required is based on over thirty five years professional experience as a Chartered Town Planner and a member of the Institute of Historic Building Conservation. My duties have involved advising on urban design, listed building matters and policies and proposals for a wide range of conservation areas.

GRANT AUDLEY-MILLER MA Oxf, DipTP, MRTPI, IHBC

2. The site and surroundings

21 Park Square East is a Grade I listed building located to the south east of Regent's Park adjacent to the Marylebone Road. The property forms part of one of the Nash Terraces fronting onto Park Square and backing onto Peto Place.

3. The heritage assets

The designated heritage assets relevant to this proposal are:

Nos 13-24 Park Square East (which includes No 21 Park Square East). These buildings are Listed Grade I and the list description is attached at Appendix 1.

The Regent's Park Conservation Area. The site is situated close to the southern boundary of the Conservation Area which was designated on 1st July 1969. The Regent's Park Conservation Area Appraisal and Management Strategy (RPCAAMS) was adopted on the 11 July 2011.

4. The proposal

The proposal consists of the installation of a Comfort Cooling System and Aerial Systems

A detailed description of the proposal and the rationale of the design approach are considered in detail in the Planning, Design and Access Statement prepared by Bell Cornwell, Chartered Town Planners.

5. National Policy Guidance on the Historic Environment

National Planning Policy Framework

The National Planning Policy Framework (NPPF) was published in March 2012 and supersedes Planning Policy Statement 5: Planning for the Historic Environment (PPS5) as Government Policy on the management of change to the Historic Environment in England.

The NPPF policies relevant to this proposal are:

Para 128. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Para 129. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

Para 131. In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage

assets and putting them to viable uses consistent with their conservation;

- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

Para 132. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

Para 138. Not all elements of a Conservation Area will necessarily contribute to its significance.

PPS5: Planning for the Historic Environment: Practice Guide

In the Revision Note to the Practice Guide, English Heritage stresses that it remains a valid and Government endorsed document pending the results of a review of guidance supporting national planning policy. The references to PPS5 policies in the Practice Guide are now redundant, but the policies in the NPPF are very similar and the intent is the same, so the Practice Guide remains almost entirely relevant and useful in the application of the NPPF.

It goes on to advise the importance of context, the scale of neighbouring buildings and the use of good quality materials.

The setting of heritage assets: English Heritage Guidance 2011

This English Heritage document was published in October 2011. It sets out guidance on managing change within the setting of heritage assets. It provides the basis for advice by English Heritage when they respond to consultations and assess the implications of development proposals on the historic estates they manage. It is also intended to assist others involved with managing development that may affect the setting of heritage assets.

Since the publication of the NPPF in March 2012 some of the references in this document are out of date but English Heritage believes, however, that the policy approach is unlikely to change and that this document still contains useful advice and case studies.

6. Relevant Planning Policy

The relevant development plan policies are those of the adopted Camden Local Development Framework Core Strategy **CS** and Development Policies **DP** adopted in 2010.

The relevant Local Development Framework policies are:

Policy CS14 Promoting high quality places and conserving our heritage

Policy DP25 Conserving Camden's Heritage. This sets out policies to maintain the character of Camden's conservation areas and preserve or enhance the borough's listed buildings.

The Regent's Park Conservation Area Appraisal and Management Strategy adopted in 2011 is used in the assessment of planning applications for proposed developments in the Regent's Park conservation area.

The Regent's Park Conservation Area Appraisal and Management Strategy describes the conservation area in considerable detail and the contribution that Park

Square East makes to the character and appearance of the conservation area. I have no hesitation in concurring with that description of the significance of Park Square East.

The Regent's Park Conservation Area Appraisal and Management Strategy identifies 'Views up Portland Place past the Circus and along Park Square East' as a Key View.

Camden Planning Guidance CPG1 on Design was formally adopted as a Supplementary Planning Document (SPD) in April 2011. Under Section 11 Building Services Equipment it stresses that 'Special consideration should be given to the installation of plant, machinery and ducting on listed buildings and in conservation areas.'

7. Relevant Planning History

Listed building consent and planning permission (application no 2010/6305/L and 2010/6303/P) was granted in 2010 for various alterations to 24 Park Square East including the installation of roof top plant equipment in the roof valley.

8. Significance of the heritage assets

21 Park Square East's significance comes from its architectural quality and its contribution to the overall design the Nash terrace of Park Square and his wider scheme for Regent's Park as a whole.

Nash had originally intended to build a circus of grand terraced houses at the north end of Portland Place but the only part of the circus to be built was Park Crescent. Instead of the circus Park Square East and West were built fronting on to Park

Square between 1823 – 5 to a design by Nash.

The terraces of Park Square East are an important visual link from Portland Place and Park Crescent through to Regent's Park and this is recognized in the Regent's Park Conservation Area Appraisal and Management Strategy where the 'Views up Portland Place past the Circus and along Park Square East' are identified as a Key View.

This has led me to conclude that in terms of the heritage assets affected by the proposal :

No 21 Park Square East is a prominent and significant Grade 1 Listed Building forming an integral part of the setting and group value of the Grade 1 Nash Terrace.

The Regent's Park Conservation Areas as a whole is of significance as a designated heritage asset with Park Square East identified as a 'key view'

9. Significance of the Building

A comprehensive description of the exterior of the building and terrace is contained in the list description at Appendix1

During the later part of the 20th century this property along with neighbouring properties underwent a comprehensive scheme of refurbishment. This is recognized in the list description which states that ".... Nos 20-24 converted to flats c1986, many original interior features destroyed.

While the original fabric survives largely intact on the front and rear elevations, a considerable amount of the interior fabric is modern work, most likely replaced during the refurbishment works during the late 1980's.

The loss of historic fabric in the interior of the building has in my opinion reduced the

special interest, and consequently the significance of the interior.

10. The Proposal

The proposal is to install:

- A Comfort cooling system consisting of 2 separate VRV (Variable Refrigerant Volume) systems each consisting of the following:
 - A roof top condenser mounted on Big Foot Fix-It free standing supports sitting in the lead valley.
 - Fancoil units, built into fitted furniture, above dropped ceilings or in roof voids.
 - Copper refrigerant pipework connecting the fancoil units to the condenser

- An aerial system consisting of:
 - A Freeview TV antenna
 - A DAB radio antenna
 - A Sky TV dish

11. Appraisal of the proposal

1. Installation of roof mounted condensers

The units will be installed in the lead roof valley using Big Foot Fix-It supports. These supports are manufactured from recycled rubber and allow the condensers to rest on the lead with no fixings into the leadwork. The installation of the condensers will therefore not involve the loss of any historic fabric and can be removed without damage to the historic fabric. As free standing pieces of equipment they will not in

my opinion harm the significance of the listed building

The supports are to be laid parallel to the fall of the valley so as not to impede the flow of rainwater to the outlet gully. Accordingly the potential for water damage caused by either water penetrating the leadwork or water backing up in the valley will be avoided. Furthermore, the roof access means there is good access to the roof for inspection and maintenance of the valley.

The use of two condensers has meant that the units can be small enough to fit below the west and east ridge lines of 21 Park Square East. Having looked at the site from Park Square East, Peto Place and surrounding roads, I am satisfied that the units will not be visible from public vantage points and have no impact on the public views of the building or the terrace as a whole. They will only be visible to those who can gain access to the roof valley. As a result I consider that the condensers will not cause harm to the significance of 21 Park Square East or the terrace as a whole.

Furthermore, they will not cause harm to views in the Regent's Park Conservation Area, particularly 'Views up Portland Place past the Circus and along Park Square East' identified as a Key View in the Regent's Park Conservation Area Appraisal and Management Strategy. Accordingly the character or appearance of the conservation area will be preserved and there will be no harm to its significance.

2. Installation of fancoil units and copper refrigerant pipework.

21 Park Square East is currently undergoing refurbishment and the modern wall and ceiling finishes are in the process of being upgraded. This has provided the opportunity to strip out the existing services and install new services before the wall and ceilings are reinstated. The copper refrigerant piping and most of the fancoil units can be accommodated behind the replaced wall and ceiling finishes thereby minimizing the impact on the internal appearance of the building. Wherever practical the diffusers have been located in fitted furniture particularly on the second and third

floor. On the basement, ground and first floors the fancoil units are proposed to be located in joinery.

Except for the joinery fancoil housings and the diffusers proposed in the fitted furniture, the pipework and fancoil units can be accommodated behind the new wall and ceiling finishes. Their installation will not involve the loss or alteration of any historic fabric and they can ultimately be removed without the loss or alteration of historic fabric. As a result I do not consider that they will have an adverse impact on or cause harm to the significance of the interior of the building.

I consider it will be appropriate to control the design of the limited number of diffusers and fancoil joinery units by means of condition on the listed building consent.

3. Installation of the aerial systems

The vertical weight of the mast plus the antennae and dish will be supported on a Big Foot Fix-It support and the mast would be braced, for lateral support, to the existing chimney stack using existing 'holes' where possible for fixings.

The 'Sky' dish will replace an existing dish.

Their installation will therefore not involve the loss of any historic fabric and can be removed without damage to the historic fabric. As essentially free standing pieces of equipment they will not in my opinion harm the significance of the listed building

The satellite dish will be fitted below the west and east ridge lines and will not be visible.

The two antennae will project above the ridge to the top of the chimneys but will be of a slender and lightweight nature and will be set back above the central valley. As stated in the report by Colin King Associates, the " 'Sight' lines are indicated on the drawings accompanying this document which show that the mast and aerials would not be visible from Park Square East." I concur with this view and also conclude that

they will not be visible from Peto Place nor in views up Portland Place along Park Square East and Outer Circus. As a result I consider that the mast and antennae will not cause harm to the significance of 21 Park Square East or the terrace as a whole.

Furthermore, they will not cause harm to views in the Regent's Park Conservation Area, particularly 'Views up Portland Place past the Circus and along Park Square East' identified as a Key View in the Regent's Park Conservation Area Appraisal and Management Strategy. Accordingly the character or appearance of the conservation area will be preserved and there will be no harm to it's significance

I would stress that the applicants have gone to great lengths to site and install this apparatus so that it has minimal impact on the fabric and character and appearance of the listed building. This is unlike the various precedents of prominent aerial systems on listed buildings that exist along Park Square East, Outer Circus and Albany Terrace.

12. Conclusions

The installation of the comfort cooling system and antennae will not involve the loss or alteration of historic fabric and the equipment can be ultimately removed without damaging the historic fabric of the building.

I consider the proposed external condensers and aerial system will not harm and sit comfortably with this nationally important terrace and will preserve the character and appearance of the Regent's Park Conservation Area and the setting of the listed buildings of the terrace.

The equipment for the interior of the building is be discretely installed behind new wall and ceiling finishes and if appropriate conditions are applied to control the

design of diffusers and joinery for fancoil housings then I am of the opinion that the proposals will not harm the significance of the building.

The proposals are consistent with the guidance in the National Planning Policy Framework the Historic Environment Planning Practice Guide. Furthermore, it does not conflict with the relevant conservation policies set out in the Camden LDF, the guidance set out in the Management of Change-Application of Policy Guidance section of the Regent's Park Conservation Area Appraisal and Management Strategy 2011 and Camden Planning Guidance CPG1 on Design.

The proposal is also consistent with the precedent set by the grant of listed building consent and planning permission (application no 2010/6305/L and 2010/6303/P) in 2010 at 24 Park Square East which included the installation of roof top plant equipment in the roof valley. Furthermore, there are numerous precedents of prominent aerial systems along Park Square East, Albany Terrace and Outer Circus.

For all the reasons set out above, it is my considered professional opinion that the installation of the Comfort Cooling System and the aerial system at 21 Park Square East can be justified in conservation terms as they will not harm the significance of the designated heritage assets.

Grant Audley-Miller
August 2014

GRANT AUDLEY-MILLER MA Oxf, DipTP, MRTPI, IHBC

Appendix 1

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

Name: NUMBERS 13-24 AND ATTACHED RAILINGS THE DIORAMA, BEDFORD COLLEGE ANNEXE

List entry Number: 1322054

Location

NUMBERS 13-24 AND ATTACHED RAILINGS, 13-24, PARK SQUARE EAST THE DIORAMA, BEDFORD COLLEGE ANNEXE, PETO PLACE

Grade: I

Date first listed: 14-May-1974

Includes: The Diorama, Bedford College Annexe PETO PLACE. Terrace of 12 houses, the northern most bay forming part of No.1 St Andrew's Place (qv). c1823-5. By John Nash. Nos 13-16 and Nos 20-24 converted to flats c1986, many original interior features destroyed. Stucco and slated mansard roofs with dormers. EXTERIOR: symmetrical terrace, 3 bays at either end and centre 7 window bays projecting. Projecting bays 4 storeys, and basements; otherwise, 3 storeys, attics and basements. 3 windows each. Ground floor with attached Ionic order supporting an entablature surmounted by a continuous cast-iron balcony (the northern most projection without railings). Square-headed doorways with architraves, cornices, pilaster-jambs carrying cornice-heads and patterned fanlights (except Nos 16, 19, 21, and 23) and panelled doors. Architraved sash windows with cornices and some glazing bars. 1st floor windows arcaded with keystones, archivolts and moulded imposts. 2nd floor sill band. Dentil cornice at 3rd floor with attic storeys over centre and end bays and balustraded parapets between. INTERIORS: with stone stairs, cast-iron, foliated balusters and wreathed wood handrails. Some panelled rooms; most with enriched ceiling cornices and central roundels. Rear ground floor room of No.24 with good vaulted and moulded ceiling, roundels of Classical figures, pilasters and pedimented mirror over original fireplace. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas. No.18 incorporates at the rear, in Peto

Place, a 3 storey, altered, polygonal building in brick with stone capped buttresses between round-arched 2nd floor windows. This was the Diorama, a picture show designed by Augustus Charles Pugin. By 1854 it had been converted into a Baptist Chapel which closed 1922 when the Middlesex Hospital used it for a rheumatism treatment pool. An arts co-operative at time of inspection in 1989.