



Historic England

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Ms Nora-Andreea Constantinescu
London Borough of Camden
Regeneration and Planning
Town Hall, Judd Street
London
WC1H 9JE

Direct Dial: 020 7973 3785

Our ref: L00519228

18 August 2016

Dear Ms Constantinescu

**Arrangements for Handling Heritage Applications Direction 2015 &
T&CP (Development Management Procedure) (England) Order 2015
10 GLOUCESTER GATE , LONDON, NW1 4HG
Application No 2016/4064/L**

Thank you for your letter of 21 July 2016 notifying Historic England of the application for listed building consent relating to the above site.

Historic England has had the opportunity to comment on these proposals at pre-application stage. Our comments are attached, please see that letter which contains a number of points relevant to our advice here. We were able to conduct a site visit on 26 May 2016.

Summary

This scheme represents a considerable degree of change and fabric interventions to a highly listed building. Aspects of this are harmful to the significance of the building: the proposed design for the reconstructed closet wing, and the alterations to plan form at ground floor. We are not convinced that these impacts have been clearly and convincingly justified, and advise seeking some amendments to reduce the impact of the scheme.

Historic England Advice

Significance

10 Gloucester Gate is part of a grade I listed terrace, stands within the Regent's Park Conservation Area, and is adjacent to the Grade I registered Park and Garden of Regent's Park.

The building was completed to the designs of John Nash c.1827. Nash was one of the most prolific and influential architects in English history, thanks largely to his patronage by George IV. Nash pioneered the development of Regent's Park and its associated villas and terraces. The result is a picturesque mixture of parkland, grand palace-fronted terraces, and smaller park 'villages'. It remains arguably London's most



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ambitious and successful pieces of large-scale town planning and is renowned on an international scale. Gloucester Gate was the last of Nash's terraces to be built around the park.

Many of the terraces around the park were badly damaged during the Second World War. 10 Gloucester Gate, however, survived relatively well. The house retains a significant degree of original fabric: its park elevation, principal staircase, and internal detailing such as cornices and architraves. To the rear of the site is a mews building which slightly post-dates the terrace, and linking the two is a multi-phased nineteenth-century extension over three storeys. Neither the mews nor the extension retain historic interior fittings to any substantial degree.

Impact

Included amongst the various areas of change associated with this application is the demolition of the multi-phased nineteenth-century link joining the house to the mews.

In its place a replacement building will be constructed. Its north wall will project into the courtyard in a segmental bow. This north elevation will be completed in three glazed bays separated by brick piers.

The mews house will be completely reconstructed internally. The brick in-fill of the arches which comprise its courtyard-facing elevation will be removed and replaced with glazing.

The house itself will see minor changes at attic level, as well as the introduction of a roof light above the stair (the fabric of the roof structure is not historic). The modern stair banisters will be replaced.

At first floor level the flat arch between the front and rear rooms will be enlarged to allow for the recreation of the room's historic form along with two new columns.

At ground floor level the plan form will be altered to allow for an ante-room to be created within the present front room. Door openings will be adjusted, and to the rear will be sealed shut. A new opening will be created between the front and rear rooms.

At basement level minor alterations will be made, and the removal of a small extension will reveal a part of the original extent of the house when seen from the courtyard.

Policy and Legislation

Your council is obliged by the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special regard to the desirability of preserving the special architectural and historic features of listed buildings, and their settings. In this context, to preserve means to cause no harm.



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In carrying out this duty, the National Planning Policy Framework 2012 provides guidance for decision making. It begins by setting out a presumption in favour of sustainable development, of which the conservation of the historic environment in a manner appropriate to its significance is established as a core principle.

Section 12 of the NPPF deals with the historic environment in detail, beginning by describing its value as a non-renewable resource. It goes on to state that great weight should be given to the conservation of designated heritage assets, and that the more important the asset, the greater that weight should be (Paragraph 132). In this instance, the building in question is Grade I listed, and therefore the weight given to its conservation should be very great.

Paragraph 132 goes on to state that any harm to the significance of a designated heritage asset requires clear and convincing justification. It should also pass certain tests depending on the magnitude of harm caused. Even less than substantial harm will require the delivery of public benefits sufficient to outweigh the harm caused (134).

Historic England's Position

In our view the scheme presents some harmful impacts to the significance of this Grade I listed building.

The extension between the house and mews is, at present, heavily altered. It is, however, well over a century old and as a result has some historical value. Its loss does amount to a degree of harm by erasing these phases of history from the site. We are satisfied, however, that its replacement can be justified providing that anything built in its place is well suited to its location.

The replacement building will, in our opinion, cause harm to the setting of the house. Its curving form will lack any architectural context in the rest of the terrace. An orthogonal form which maintained the straight lines of the house, terrace, and mews buildings is equally achievable and would avoid this harm. There is some mitigation offered by the lack of visibility from other areas of the terrace, however the experience of the house from the courtyard will be dramatically altered, and in our view harmfully so.

Classically planned London town houses are defined to a great extent by the notion of a hierarchy of spaces. High status areas are universally located in the ground and first floor areas of the principal house. These floors will be higher in dimension than the floors above or below them to emphasise their status. We are concerned that the replacement extension will undermine this historic hierarchy by introducing the largest, highest internal space as a dramatic modern extension. Rather than functioning as a link, it will instead be a double-height entertaining space spanning the ground and first floors, and detracting from the importance of the Grade I listed building within the hierarchy of the site.



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The extension could be modified to work better with the geometry of the terrace by retaining an orthogonol form as found in the existing extension and at neighbouring properties. Likewise, by limiting the extension to follow the scale of the ground floor (still generously proportioned) its relationship to the hierarchy of the building could be significantly improved. This would also allow the revealing an area of the rear elevation of the building, and provide more light to the courtyard and the rear windows of the house.

The proposed intervention at ground floor to alter the existing plan form received detailed comment from us at pre-application stage. The existing plan of the ground floor area is very plausibly historic. The research carried out on behalf of the applicants has revealed no historical precedent for any alternative plan form in this area of the house. Indeed, the neighbouring properties in the terrace appear to show the same plan as that found in No. 10. In our view, then, the existing layout should be presumed to be original, or historic enough to give it a relatively high level of significance. The proposals will obscure this plan form, and reduce the ability to read the historic arrangement of spaces at ground floor. We do not consider the level of justification for this work to be convincing, or that it is associated with any particular public benefits.

We suggest that two options are available in taking this element of the proposal forward. It may be that limited opening up works under the supervision of a buildings archaeologist might help to answer whether or not any alternative plan form existed in this location historically. Alternatively, the design of the ante-room could be amended so that the proportions of the front room remain more clearly discernible to anyone within that space.

Recommendation

We urge your council to address the issues set out above, and would be delighted to engage in any further discussions which arise from these comments.

We would welcome the opportunity of advising further as the implications of this application are significant and we are unable to direct as to the granting of listed building consent at this stage. Please consult us again if any additional information or amendments are submitted.

Please note that this response related to historic building matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3735).



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Yours sincerely



Matthew Cooper

Inspector of Historic Buildings and Areas

E-mail: matthew.cooper@HistoricEngland.org.uk

cc

Charles Rose, Conservation Officer to the London Borough of Camden

Timur Tatlioglu, Associate at Montagu Evans



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Direct Dial: 020 7973 3785

Our ref: PA00428682

7 June 2016

Dear Dr Tatlioglu

Pre-application Advice

10 GLOUCESTER GATE, NW1 4HG

Thank you for your request for pre-application advice, and for the very helpful site visit which took place Thursday 26 May 2016.

The application site is within the Regents Park Conservation Area, and adjacent to the Grade I registered Park and Garden of Regent's Park. It forms part of John Nash's well-preserved vision for a picturesque development of classical terraces, villas, and parkland on the edge of Georgian London.

The house itself (no. 10) forms part of Gloucester Gate, the last of Nash's terraces to be constructed and was completed c.1827. It was listed Grade I in 1974.

Much of the original architecture survives (cornicing, staircase, plan form, principal elevation), along with a considerable amount of later addition and adaptation. The large rear extension connecting the terrace to the mews dates from several phases in the nineteenth century and was most recently adapted in the 1980s. The form of this extension is repeated in the neighbouring properties on either side.

Impact

The areas of change associated with the proposals include the demolition of the nineteenth-century rear extension (and a small basement extension); the construction in its place of a new extension with a glazed segmental north elevation; the reconfiguration of the mews house to remove all existing partitions at first floor; the opening up of brick arches to the rear of the mews elevation and the creation of glazed in-fills (replacing brick).

The attic storey of the principal house will have some minor modifications, and the insertion of a roof light above the stair case. The (modern) banisters of the attic stair will be replaced. Under floor heating will be introduced throughout the house, with the



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associated removal of radiators and their covers.

At first floor the square, architraved opening between the front and rear rooms will be replaced by a pair of flanking columns and an entablature.

At ground floor a new wall will be inserted into the front room and openings made to allow access between the front and rear rooms; the doorway into the front room from the corridor will be removed, and the doorway into the rear room will be sealed shut and concealed from within the room itself.

At basement level minor alterations will be made.

Policy

The Planning (Listed Buildings and Conservation Areas) Act 1990 places a statutory duty on Local Planning Authorities to pay special regard to the desirability of preserving the special architectural and historic features of listed buildings, and their settings.

Guidance on the exercise of this duty is given in the National Planning Policy Framework 2012 which places a presumption in favour of sustainable development on all applications. A core principle of this is the conservation of the historic environment in a manner appropriate to significance.

This is described in Section 12 of the NPPF which begins by setting out that the historic environment is a non-renewable resource. It goes on to state the value of properly understanding significance, and that great weight should be given to the conservation of heritage assets. The more important the asset, the greater that weight should be.

Paragraphs 132-134 of the NPPF explain that significance can be harmed through the alteration of heritage assets or through development within their setting. Harm of any kind to designated heritage assets requires clear and convincing justification, and any less than substantial harm must be justified through the delivery of public benefits.

Position

Many of the proposed alterations are minor or uncontraversial in nature: those to the basement, the configuration of the attic storey and stair are areas where we will not comment on detail based on the information we have seen.

The proposed roof light should only be considered if it can be shown that the roof structure is not historic. A survey of the timbers/method of construction within the roof should confirm this. Proposals for the design of the roof light have been made on the



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basis of Soanean examples; I suggest also considering Nash roof light designs in order to fit in with the origins of the building's architecture (Nos. 5 and 7 Gloucester Gate originally had top lit staircases and drawings may be accessible through archival research).

The principle of underfloor heating is not in my opinion contentious, however your application should demonstrate that the floor structure as existing is not historic, and that no damage will result to floors, ceilings or cornices.

At first floor the proposal to alter the connection between front and rear rooms should be clearly set out as a scholarly reinstatement of an original configuration as part of your eventual application. On this basis, and subject to careful detailing and execution, we would have no objection to the works.

The reconfiguration of rooms at ground floor level appears to be without precedent in the house and is therefore a major alteration to plan form. While it is possible that with further research you may be able to uncover a record of a previous configuration of rooms, it is highly likely in my opinion that the present configuration is as originally intended. If a case for alteration is to be made it will need to demonstrate evidence for an earlier configuration of plan in this area. Without such evidence we would object to the loss of such a significant element of the principal rooms of a Grade I listed house.

The demolition of the nineteenth-century extension will bring about some harm to the significance of the building. While built in phases this extension is now of some historical value, with its earliest parts dating to the 1860s. This value is arguably limited as a result of substantial alterations having taken place and we will not therefore raise any objection providing you are able to demonstrate a clear case for its replacement rather than re-use.

If a clear and convincing case can be made for the demolition of that extension, the design of its replacement requires consideration based on the desirability of preserving the setting of the house and mews. The proposed design uses a segmental bow to create more space within the new structure. This curve will lack context against the orthogonal architecture of the house and terrace, particularly as rear extensions along the rest of the terrace use contextual forms and materials. In the confined environment to the rear of the house the proposal is likely to have a dominating presence.

We consider the impact of the proposed extension to be harmful to the significance of the house through the alteration of its setting, and the introduction of new architectural forms which are not consistent with the presiding classical proportions. We would recommend instead a design which worked with the orthogonal forms of the house and terrace.



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Next Steps

Please consider carefully the advice given above. We especially recommend the need to address the clear and convincing justification behind the alterations at ground floor level. If an evidence-based argument for the alteration of these areas cannot be put forward this aspect of the proposals should be removed in order to avoid harm to this highly listed building.

We look forward to hearing further from you as your plans develop and would be delighted to engage further in any design discussions regarding the proposed extension.

Yours sincerely



Matthew Cooper
Assistant Inspector of Historic Buildings
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10 GLOUCESTER GATE, NW1 4HG Pre-application Advice

Information Provided

Drawing Set May 2016
Design and Access Statement (Draft) May 2016
Schedule of Interior Details



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