

**GLOUCESTER LODGE
GLOUCESTER GATE
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LONDON
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**HERITAGE STATEMENT
ADDENDUM**

July 2017

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1.0 INTRODUCTION

- 1.1 This Heritage Statement has been prepared by Montagu Evans on behalf of Iconic Properties Ltd. It is written in support of applications seeking Minor Material Amendments (submitted under Section 73 of the Town and Country Planning Act (as amended)) to planning permission reference 2016/4549/P and supports an associated application for Listed Building Consent.
- 1.2 The previous applications were supported by a comprehensive Heritage Statement which places the house in its historic context and assesses the original scheme. This Statement should be read alongside the previous Heritage Statement, which contains a number of historic maps and early drawings of the house. The proposed refurbishment and extension of the house was assessed in the previous Statement and now has the benefit of an extant Planning Permission and Listed Building Consent.
- 1.3 In Section 2 of this report, we present the further research undertaken in recent weeks, which has been shared with the Council and Historic England in pre-application discussions leading up to this submission. In Section 3, this Statement identifies the current planning policy framework, reflecting the recent adoption of the Local Plan. In Section 4, we consider the scheme, focussing on those aspects of the works which differ from the previously approved scheme.

2.0 FURTHER RESEARCH

- 2.1 The previous scheme was accompanied by a detailed Heritage Statement and this application for minor material amendments (s.73) and listed building consent is informed by much of that earlier research and assessment.
- 2.2 However, following the grant of those permissions we have undertaken further research into the history of the building. The most significant discovery in our research has been the identification of plans, dating from 1929, which shed new light on the original form of the villa and those parts of the building which had previously been dated to the 1830s and attributed to Mr Papworth.
- 2.3 The plans of the existing building in August 1929 were drawn by Harold Currey. It was Currey who oversaw the extension of the property in the 1930s, demolishing Papworth's more modest works in the process. Currey was a licentiate member of the RIBA, appointed by Major Walter Waring and Lady Clementine Waring, their daughter Clematis Campbell, and her husband Captain George Campbell.
- 2.4 The Warings were occupying Gloucester House, while their daughter and her husband occupied the adjoining property, Gloucester Lodge. Currey applied to extend the building for the growing Campbell family, before making a further application in 1930 to connect the two houses through the party wall on the ground floor. This connection was made for the family, though by 1932, Captain Campbell had assigned the lease of Gloucester Lodge to Lord Ridley and the opening was closed up once again.
- 2.5 Having taken the lease on Gloucester Lodge in 1932, Lord Ridley instructed his brother-in-law, Robert Lutyens, to transform the interiors. Lord Ridley was married to Ursula Lutyens, daughter of Sir Edwin Lutyens, and it was their house, with Lutyens' interiors that featured in the Country Life article in February 1934.
- 2.6 The introduction of Currey's two-storey southern extension in the 1930s had a dramatic effect on the building's plan form and increased the size of the house significantly. The plans of the house before work commenced are included below.

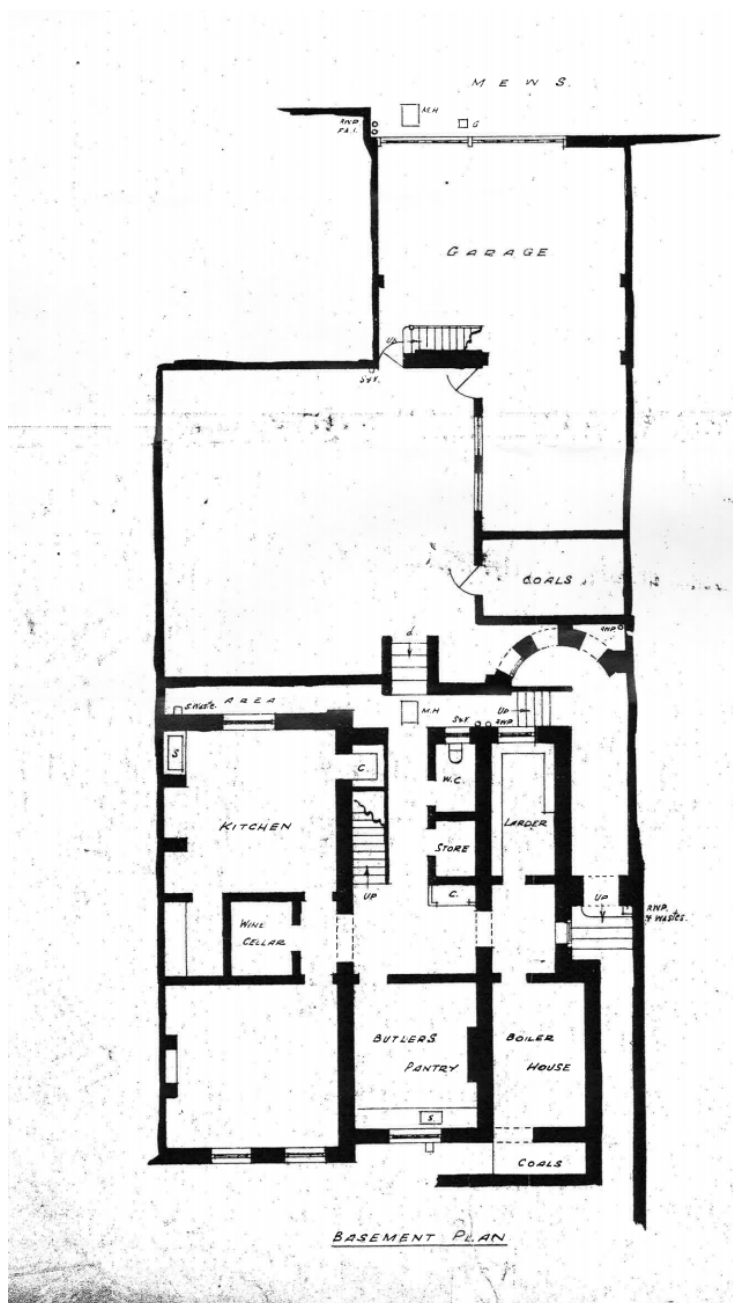


Fig. 1. Basement Floor as Existing, August 1929

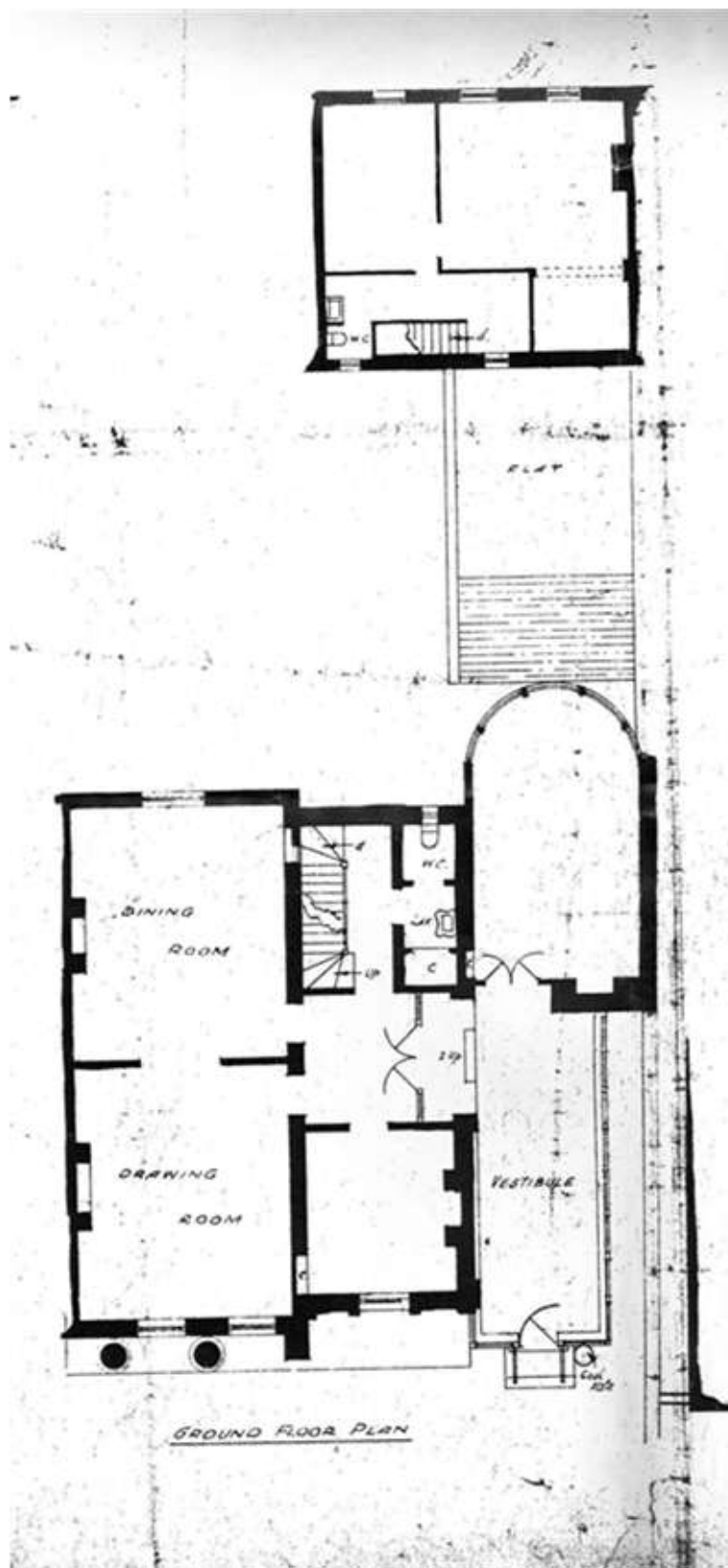


Fig. 2. Ground Floor as Existing, August 1929

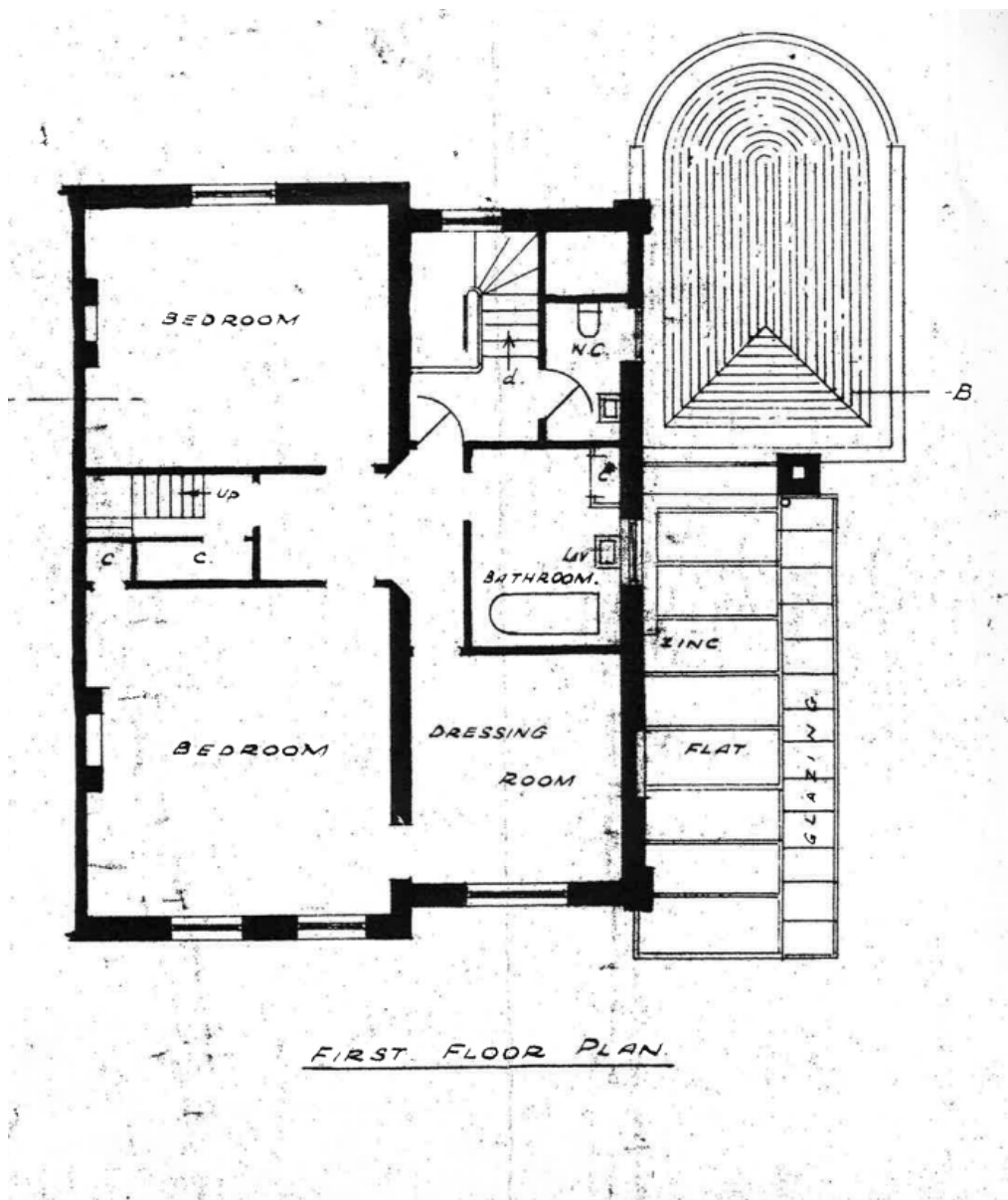


Fig. 3. First Floor as Existing, August 1929

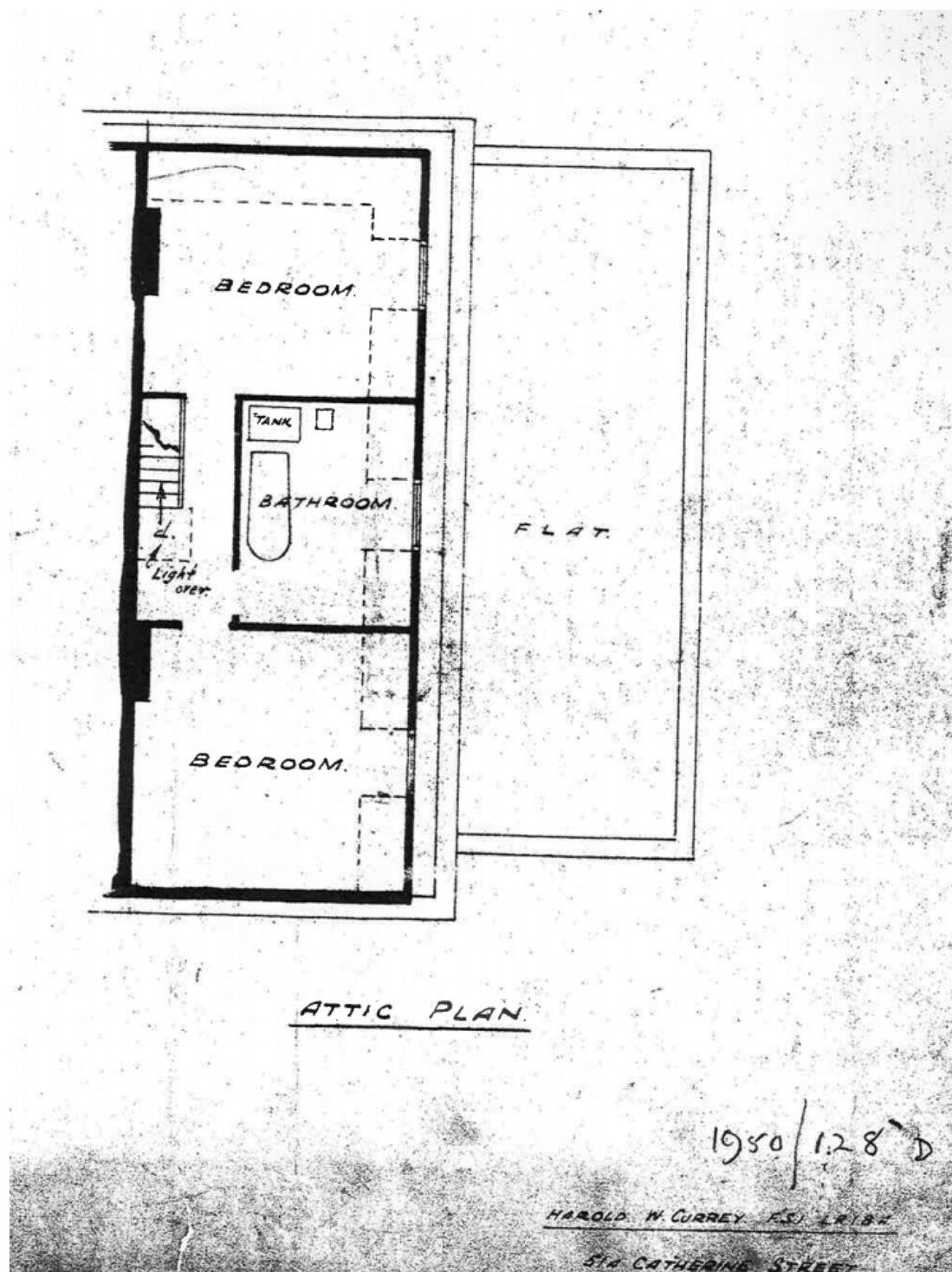


Fig. 4. Second Floor as Existing, August 1929

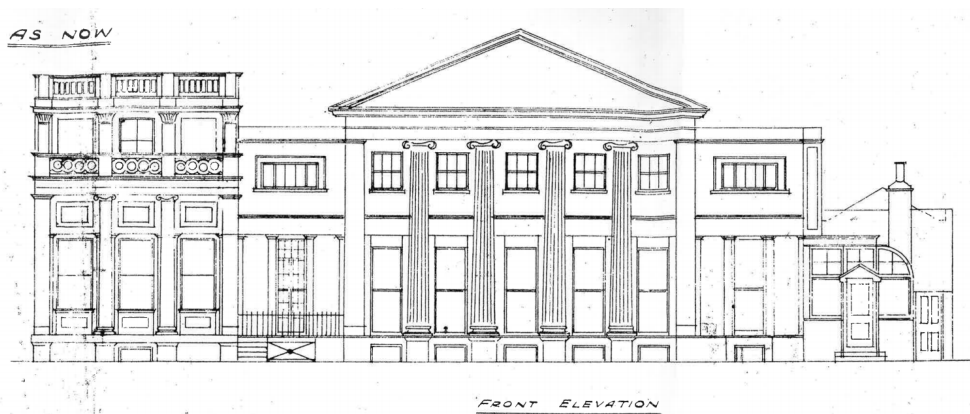


Fig. 5. *Front Elevation as Existing, August 1929*

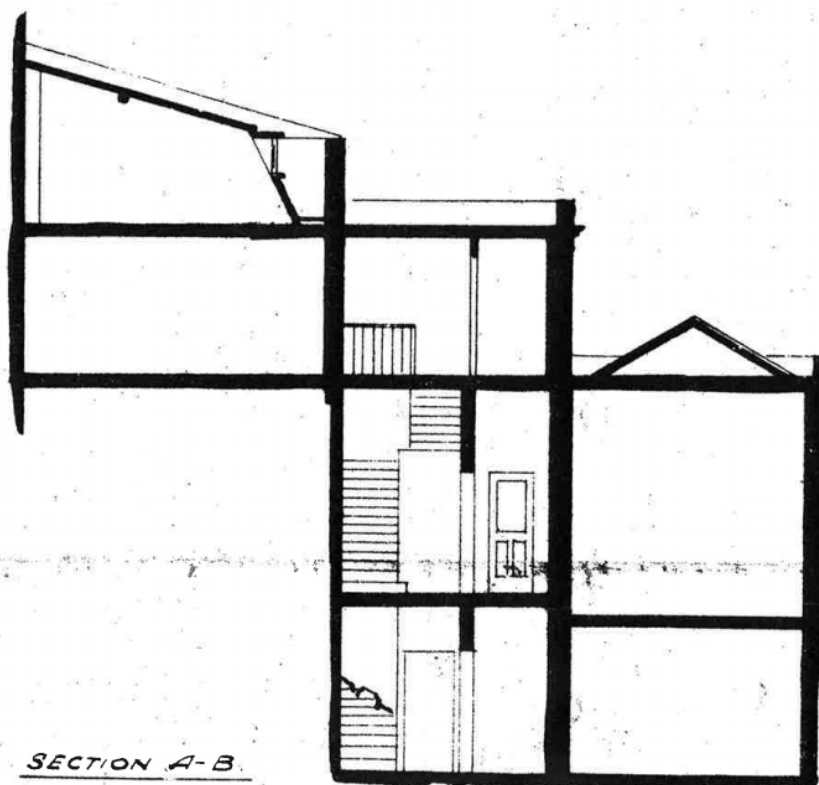


Fig. 6. *Section A-B as Existing, August 1929*

3.0 CURRENT LEGISLATIVE AND PLANNING POLICY FRAMEWORK

3.1 This section considers the legislative provisions and planning policies applicable to the current applications.

Planning (Listed Buildings and Conservation Areas) Act 1990

3.2 The Planning (Listed Buildings and Conservation Areas) Act 1990 (“the 1990 Act”) provides the relevant legislation in this case. Sections 16(2), 66(1) and 72(1) of the 1990 Act set out the duties on the decision maker in this case.

- **Section 16(2)** states that in considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall 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.
- **Section 66(1)** states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or the Secretary of State shall 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.
- **Section 72(1)** states that with respect to any buildings or other land in a conservation area, of any [functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Development Plan

3.3 **Section 38(6)** of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the adopted Statutory Development Plan unless material considerations indicate otherwise. The currently adopted Statutory Development Plan is formed from the following documents:

The London Plan (July 2011 with alterations 2016); and Camden Local Plan (2017)

London Plan (2011 with alterations 2016)

3.4 The London Plan is “the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years” (p.10). The policies relevant to the assessment of heritage are included at Chapter 7 (London’s Living Places and Spaces).

3.5 **Policies 7.4** (Local Character) and **7.6** (Architecture) require development to make a positive contribution to the public realm, streetscape and wider cityscape, and to take references from the form, mass and orientation of the existing built environment.

- 3.6 **Policy 7.8** (Heritage Assets and Archaeology) outlines policy requirements for development affecting heritage assets. Part C of the policy states that new development “*should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.*”
- 3.7 The supporting text in support of Policy 7.8 was subject to minor additions in the review of October 2013. It is stated that crucial to the preservation of London’s unique character is the careful protection and adaptive re-use of heritage buildings and their settings.

Camden Local Plan (2017)

- 3.8 The Camden Local Plan was adopted by the Council on 3 July 2017, and replaced the Core Strategy and Camden Development Policies as the Development Plan.
- 3.9 Section 7 Contains policies relating to Design. The policies which are of relevance to this application are included below.
- 3.10 **Policy D1** (Design) outlines the Council’s approach to securing high quality design in development. The following requirements for development are salient to this application:
- a. *respects local context and character;*
 - b. *preserves or enhances the historic environment and heritage assets in accordance with Policy D2 – Heritage;*
 - c. *Is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
 - d. *is of sustainable and durable construction and adaptable to different activities and land uses;*
 - e. *comprises details and materials that are of high quality and complement the local character;*
 - g. *is inclusive and accessible for all;*
 - j. *responds to natural features and preserves gardens and other open space;*
 - k. *incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening, for example through planting of trees and other soft landscaping;*
 - l. *incorporates outdoor amenity space;*
 - m. *preserves significant and protected views;*
 - o. *carefully integrates building services equipment.*
- The council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.”*

3.11 **Policy D2** (Heritage) outlines the Council's approach to designated and non-designated heritage assets and their settings. With regard to designated heritage assets, the policy outlines the approach to substantial or less than substantial harm.

3.12 With regard to conservation areas, the policy states that:

"In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas"

3.13 The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- g. resist development outside of a conservation area that causes harm to the character or appearance of the conservation area; and*
- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage."*

The following parts of the policy relate to Listed Buildings.

"To preserve or enhance the borough's listed buildings, the Council will:

- i. resist the total or substantial demolition of a listed building;*
- j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and*
- k. Resist development that would cause harm to the significance of a listed building through an effect on its setting."*

Material Considerations

National Planning Policy Framework (NPPF) 2012

3.14 The National Planning Policy Framework (hereafter the NPPF), published in 2012, establishes the Government's approach to planning and its central aim to achieve sustainable development.

3.15 At the outset, paragraph 14 sets out the presumption in favour of sustainable development that *"should be seen as a golden thread running through both plan-making and decision-taking"*, subject to specific policies in the NPPF that indicate development should be restricted, such as those towards heritage assets.

- 3.16 Chapter 12 of the NPPF sets out the Government's policies relating to the conservation and enhancement of the historic environment.
- 3.17 **Paragraph 137** of the NPPF states that local planning authorities should look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.
- 3.18 **Paragraph 134** states that:
"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 securing its optimum viable use."
- 3.19 Our assessment considers that there is no harm to the significance of heritage assets arising from the Proposed Development, however, if the Council take a differing view, and find some harm to the listed building or conservation area, then the policy test at paragraph 134 would be engaged.
- 3.20 The Glossary contained in **Annexe 2** of the NPPF defines 'conservation' in relation to heritage as:

"The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance."
- 3.21 Ultimately, the preservation of significance is paramount in planning considerations relating to the historic environment. Therefore, concern for the preservation of fabric or particular features, although likely to be relevant considerations for an individual case, is superseded by the necessity of sustaining significance.

National Planning Practice Guidance (First Live 2014) ("NPPG")

- 3.22 This guidance was published as a web-based resource on 27th March 2014. The publication includes useful guidance on decision-taking with regard to historic environment matters. **Paragraph 3** provides guidance on conservation, and states that:

"In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time [...] Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and

decision-taking to ensure that heritage assets are conserved, and where appropriate, enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development.”

Paragraph: 033 Reference ID: 18a-003-20140306

Historic Environment Good Practice Advice in Planning, Note 2, Managing Significance in Decision-Taking in the Historic Environment

- 3.23 Historic England published its Historic Environment Good Practice Advice in Planning, Note 2: Managing Significance in Decision-Taking in the Historic Environment in April 2015. The guidance is intended to assist those implementing historic environment policy, and provides information on assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and further understanding, neglect and unauthorised works, marketing and design and distinctiveness.

LB Camden Regent’s Park Conservation Area Appraisal and Management Strategy (2011)

- 3.24 The Regent’s Park Conservation Area Appraisal was published in 2011 and relates to the eastern segment of John Nash’s early nineteenth century Regent’s Park development. The document sets out the special interest of the area and provides an assessment of its character and appearance, including features of local interest.
- 3.25 Gloucester Gate is described within the Conservation Area Appraisal alongside a brief history of the development.

4.0 ASSESSMENT

- 4.1 Further research into the history of the building has shown that the plan of Gloucester Lodge has changed dramatically over time. Having originally been designed as a single, detached villa, the property was bisected to form two semi-detached properties, with the main access to Gloucester Lodge from the south.
- 4.2 Gloucester Lodge was then extended to the south, with the main entrance brought round to its first location on the park front, through a long, single-storey vestibule. In the 1930s, these extensions were replaced by Harold Currey and the entrance to the house moved again, to its current location. For a short period, the houses were connected again, at ground floor level. As a consequence, the size of the house, the point of entry and the spatial relationships between the different parts of the house have been altered considerably. As the scale of the house and its plan form are not preserved, we believe there is scope for the building to accommodate considered change today without harm to its significance as a heritage asset.
- 4.3 We address the principal changes in turn, considering first the changes to vertical circulation.

Lift

- 4.4 The permitted scheme proposed a lift in the location of the dumb waiter, next to the main stair. We now propose to relocate the lift to the lightwell that was formed in Currey's 1930s extension. This would serve the basement, ground and first floors, terminating with a glass rooflight. We believe this is a particularly discreet and unobtrusive location for the lift with no readily perceived external manifestation.

Staircase

- 4.5 We are also proposing to relocate the plain timber stair between the first and second floors. The earliest depictions of the house do not show accommodation at second floor level, though it may have been introduced during the property's conversion to two houses. In any case, by the 1920s a form of mansard is shown at this level, largely concealed behind the pediment. That mansard was demolished by Currey in the 1930s and replaced by a sheer storey.
- 4.6 Make Architects propose to relocate the stair serving the second floor locally within the plan form, retaining the original aspect and the historic fabric. There are two issues to consider:

Fabric – the proposal is to relocate the staircase in its entirety, avoiding the loss of historic fabric. The applicant is willing to appoint a specialist for this work, skilled in carpentry and furniture restoration, who would carefully dismantle, repair and relocate the staircase in accordance with an approved methodology. This methodology could be subject to a condition attached to the Listed Building Consent, giving the Council full control over this work. Where necessary, new elements of joinery would match

the existing, replaced on a like-for-like basis as would normally be expected in repair work to a listed building.

Plan form – properly assessed, the plan form of this house today is not of special interest. In the first instance, it lacks legibility, to the extent that the building's evolution has only been pieced together following extensive archival research and analysis. The property has undergone significant alteration and extension both in the nineteenth and twentieth centuries. The second floor accommodation has been heavily remodelled in the twentieth century, and is proposed, under the most recent consent, to provide two bedrooms, each with an ensuite bathroom. Whilst the house, like all buildings, has a plan form, a value judgment is required to determine whether the current arrangement is significant in heritage terms. We conclude that it is not, and that the highly evolved arrangement that happens to exist today could accept further, considered change without harm.

- 4.7 Based on our assessment of the two main issues, we see no basis to resist this particular aspect of the scheme. The purpose of conservation is to manage change, informed by a detailed understanding of an asset and the relative importance of those elements that contribute to significance. Had our research shown that this house, in its current form, represented a well-preserved example of a nineteenth-century domestic plan, we may well have concluded that a change to that plan would be harmful. However, the research we have undertaken has shown quite the opposite; revealing a plan which has undergone significant change at different points in its history. If that means the plan, as it happens to exist today, must be preserved, the process of assessment becomes academic.
- 4.8 Notwithstanding our conclusions, Historic England has expressed some level of concern about this aspect of the proposal. If that view is maintained, and accepted by the authority, it would be necessary to balance any alleged harm with the public benefit of the scheme.
- 4.9 In a planning context, it is well established that public benefits are not determined by their level of accessibility to everyone. The delivery of new residential accommodation, for example, is a public benefit, even though that accommodation is for private occupation and enjoyment. Similarly, the majority of the country's housing stock is in private ownership, but the maintenance and improvement of that stock is a public benefit for planning purposes.
- 4.10 In this case, the relocation of the staircase would achieve a significantly improved layout of accommodation on the first and second floor, as identified and articulated by Make Architects in consultation with William Bertram. They conclude that the relocation of the staircase would provide better and more useable space for the benefit of all future occupiers. That is a legitimate public benefit which attracts weight under the planning policy framework.

Lower Ground

- 4.11 A small number of changes are proposed at this level, with the floor level of the previously approved link being brought to the same level as that in the main house. It is also proposed to remove the window from the existing kitchen and to introduce double doors in timber. The steps in the courtyard would be reduced in width, reflecting an arrangement closer to their historic form than shown on the consented scheme.

Ground Floor

- 4.12 On the ground floor, the changes are focussed on that part of the building which we now know to have been built in the 1930s. The scheme reintroduces a second door to the living room, in a location where there was one historically. The floor level of the main house would be followed through into the 1930s extension and an internal window created in a location consistent with the plan of the original villa. A further window is created to the stair hall, bringing natural light into the main entrance hall.

First Floor

- 4.13 The changes at first floor level are primarily associated with the proposed lift and the relocation of the staircase. We have considered these changes separately.

Second Floor

- 4.14 The earliest depictions of the villa do not show accommodation at second floor level, though it may have been introduced during the property's conversion to two houses, first in the form of a mansard that extended back behind the villa's main pediment. We see this arrangement on the section dating from 1929. The current arrangement dates from the 1930s, when the mansard form was replaced with a sheer external wall, rendered to match the rest of the house. The fabric and form of this part of the building is therefore of limited interest.
- 4.15 The proposal is to adjust the window arrangement at this level, so that it better reflects and serves the accommodation. This is not considered to be harmful to the special interest of the listed building or the conservation area.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 The previous scheme for refurbishment and extension of the house was assessed on the basis that the overall scale and plan of the building could be traced back to the first half of the nineteenth century and the designs of James Burton and John Papworth. We now know that the major remodelling of Gloucester Lodge was in fact undertaken in the 1930s, by Mr Currey, a licentiate member of the RIBA.
- 5.2 Our assessment of the scheme is informed by this research, as we now know that the building is not a well-preserved example of a nineteenth-century house. It is, in fact, highly evolved in its present form with a major phase of demolition and construction having taken place in the interwar period.
- 5.3 We concluded that the previous scheme would preserve the listed building and the conservation area. Having regard to the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, and the current development plan, we reach the same conclusion on the overall scheme to refurbish and extend the house. Having assessed the proposed changes to the listed building and the minor amendments under s.73, we believe these applications would preserve the special interest of the listed building and the character and appearance of the Conservation Area.

