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**Planning
Solutions Team
Planning and
Regeneration
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Directorate**

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Dear Mr Watson,

Re: First Floor 31 and 38 Cumberland Terrace London NW1 4HP

Thank you for submitting a pre-planning application enquiry for the above property which was received on 13 June 2017 together with the required fee of £1218.

1. Drawings and documents

Existing and Proposed Floor Plan

2. Proposal

The pre-application proposal is for the amalgamation of two first floor flats to create one with associated internal alterations:

- Removal of former party wall and fireplace
- Creation of new openings in existing (or line of former) party walls
- Removal of internal partitions
- Insertion of new partitions to reconfigure plan layout

3. Site description

These two flats sit at first floor level of the Grade I listed terrace of 59 houses 'No's 1-59 and attached railings'. They date to c1827 and designed by John Nash and J Thomson for the Commissioners of Woods, Forests & Land Revenues; built by JG Bubb. It was designed to appear as a palace fronting the parkland and was named after the Duke of Cumberland, the brother of King George IV and is the grandest of the 11 terraces in Regents Park. The composition is of three blocks linked by triumphal arches leading in to two courtyards with pairs of houses and drives which lead to what was formerly mews. The terrace is approximately 240m and is of three and four storeys with attic and basements; and finished in painted stucco. Centrally within the terrace is a projecting Ionic decastyle pedimented portico of Giant Order, flanked by slightly less projecting bays with paired columns and attic storeys.

The flats that relate to this pre-application sit in the central block (at first floor level), within the projected section and to their front elevation have external terraces within the portico.

The terrace also sits within the Regents Park Conservation Area and look over the park itself to the west.

The terrace suffered severe bomb damage during the second world war, following this the buildings were converted in to offices and have been reconstructed behind a retained façade in the 1960 & 70's. There are as such very little features of historic value remaining within the building. The historic plan form has largely been lost due to the lateral conversion for residential properties.

Relevant planning history

31 Cumberland Terrace:

2010/6831/L - Internal alterations including the removal and replacement of existing partition walls to dwelling house (Class C3). Granted 13/04/2011.

38 Cumberland Terrace:

2011/0496/L - Internal alterations involving the reconfiguration of internal walls, installation of cornices, and refurbishment of first floor flat (Class C3). Granted 21/03/2011.

2011/3739/L - Internal alterations including reconfiguration of partition walls, installation of new cornices and panelled doors between dining room, living room and bedroom and the installation of new entrance lobby with built in cupboards to existing first floor flat (Class C3). Granted 15/09/2011.

4. Relevant policies and guidance

[National Planning Policy Framework 2012](#)

[The London Plan March 2016](#)

[Local Plan 2017](#)

Policy G1 Delivery and location of growth
 Policy H3 Protecting existing homes
 Policy A1 Managing the impact of development
 Policy D1 Design
 Policy D2 Heritage

[Camden Planning Guidance](#)

CPG1 (Design) 2015
 CPG2 (Housing) 2011
 CPG6 (Amenity) 2011

[Regent's Park Conservation Area Appraisal and Management Strategy](#)

5. Assessment

The key planning issues are as follows:

- Principle of development
- Design (the impact of the proposal on the Grade I listed building, streetscene and Conservation Area)
- Amenity (impact on neighbouring amenity in terms of daylight, outlook, and privacy)

Principle of development

Policy H3 of the Camden Local Plan 2017 seeks to resist development that would involve the net loss of two or more homes.

Therefore the proposed amalgamation of two flats (31 and 38 Cumberland Terrace) at first floor is considered acceptable as it would result only in the net loss of one home. This is on the basis that the units are maintained as Use Class C3.

A 3 bedroom, 6 person dwelling is required to have a minimum gross internal floor area of 95sqm. The proposed amalgamated flat would result in a total gross floor area of approximately 300sqm. Therefore, the size of the flat would be compliant with the Technical Housing Standards 2015.

Design

The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. The Local Plan policy D1 (Design) requires development to be of the highest architectural and urban design quality which improves the function, appearance and character of the area. Policy D2 (Heritage) 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. Camden's Local Plan Document is supported by CPG1 (Design).

The application building is designated as a Grade I listed building in the Regent's Park Conservation Area. As such, any intervention must be carefully considered to ensure there is no resulting harm to the designated heritage asset.

On review of the proposed extensions and alterations as well as discussions with Council's conservation officers the following comments have been raised.

There are no objections to the principle of amalgamating the two units in one; however for this to be undertaken depends on changes to the fabric and plan form.

It is noted that the existing interior is largely of recent insertion and fabric; however it is still part of the listing and therefore part of the buildings significance and it is expected that proposals would seek to preserve and enhance its significance and where possible reinstate plan form and decorative detailing.

It would be useful to have historic plans if possible; and highlighted plans to appreciate where the historic plan form is being reinstated or further eroded.

There are concerns with the current extent of proposals mainly the removal of the party walls and creation of openings within them, and as such the resultant cumulative impact. More sensitive areas are where the party walls meet the front elevation; this is due to the visual impact external and internally; and the change to the spatial characteristics of the front reception rooms. It is also not clear at this stage what benefits are brought forward which could be seen to outweigh the harm caused by loss of these significant elements of the plan form.

There are fewer concerns where the proposals amend the existing layout of partitions to the rear rooms; however it would be beneficial if there were possibility to reference the historic plan form.

Submission of Structural and Heritage Reports would be useful to appreciate the works involved with alteration to the plan form; this will appreciate whether the existing fabric is of modern construction (chimney breast/party walls etc.) and as such the structural impact. In addition, a Heritage Assessment would include historic floor plans which would highlight where reinstatement is being proposed; and lost; and the resultant harm/benefits.

A scheme is likely to be supported if the current proposals are reduced to lessen the harm upon the listed building; and/or further justification by way of benefits being brought forward which are seen to outweigh the harm. These would include upgrading and enhancement and reinstatement of correct detailing and the plan form. It is advised that follow-up pre-app is sought prior to submitting full applications and additional information submitted as below:

- Phasing plans highlighting areas of proposed removal of historic fabric – and reinstatement of historic plan form
- Document highlighting what are the benefits being brought forward
- Structural appraisal which highlights on plan and sections what historic fabric is still existing

Although the submitted pre-application statement notes comments made in the approval report for a 2011 application; such as that there are ‘no features of historic interest’ and ‘the plan form has been altered’, it does not state in any case that for these reason there are justification to allows for further erosion or harm.

The Planning (Listed Buildings and Conservation Areas) Act 1990 states that when considering whether to grant LBC the LPA shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest. Again, it is noted that there has been substantial loss of fabric, features and plan form here; however, it is not considered that the proposal in this case preserves the building and its architectural interest (the plan form). As mentioned above; the proposals should look to reinstate/upgrade/enhance this listed building; including bringing benefits forward.

To note the Planning Statement on page 9 quotes Westminster Council Development Plan and; Historic England will be consulted at application stage and will require full endorsement of the proposals prior to support from The Council. It would be up to the applicant to contact them directly for input at pre-application stage.

Amenity

Policy A1 of the Local Plan seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission to development that would not harm the amenity of neighbouring residents. This includes privacy, outlook, noise and impact on daylight and sunlight. Camden's Local Plan Document is supported by CPG6 (Amenity).

All proposed works are internal therefore there would be no impact on the amenity of the adjoining properties.

6. Conclusion

The principle of amalgamating the two first floor flats into one flat is considered to be in accordance with policy H3 of the Camden Local Plan as it would only result in the loss of one home.

As advised above by Council's conservation officer, it is noted that there has been substantial loss of fabric, features and plan form here; however, it is not considered that the proposal in this case preserves the building and its architectural interest (the plan form). As mentioned above; the proposals should look to reinstate/upgrade/enhance this listed building; including bringing benefits forward.

7. Planning application information

If you submit a planning application which addresses the outstanding issue detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form –Full Planning Permission
- 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'
- Roof 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'
- Design and access statement
- Planning statement and supporting evidence justifying the proposed change of use
- Sample photographs/manufacture details of materials
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information.

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a site notice on or near the site and must allow 21 days from the consultation start date for responses to be received.

It is likely that that a proposal of this size would be 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 document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter or the attached document please do not hesitate to contact Alyce Keen on the number above.

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

Yours sincerely,

Alyce Keen

Planning Officer
Planning Solutions Team