

**19 Park Square East Ltd.**  
February 2020



## **HERITAGE STATEMENT** **19 PARK SQUARE EAST**

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## Quality Assurance

Site name: 19 Park Square East, London, NW1 4LH

Client name: 19 Park Square East Ltd.

Type of report: Heritage Statement

Prepared by: Eleanor Grace BA (Hons) MSc

Signed:



Date: February 2020

Reviewed by: Steven Handforth BA (Hons) MSc



Signed:

Date: February 2020



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## Appendix 1

STATUTORY LIST DESCRIPTIONS

# 1.0 Introduction

- 1.1 This Heritage Statement has been prepared on behalf of 19 Park Square East Ltd. to assess the extant heritage value of 19 Park Square East, London, NW1 4LH. The property forms part of the terrace '13-24 Park Square East and attached railings, the Diorama, Bedford College Annexe' which is included on the Statutory List for Buildings of Architectural or Historic Interest. It is also located within the Regent's Park Conservation Area within the London Borough of Camden.
- 1.2 This report also assesses the likely impact of the proposed change of use from offices to residential to form a self-contained dwelling over basement, ground and three upper storeys, excavation of existing vaults, rear extension, internal subdivision and refurbishment and associated works.
- 1.3 This review includes a historic context section, which allows an assessment of the relative heritage value of the existing building on site, before the impact of the proposals is determined. This approach to heritage assessment is required in order to satisfy the provisions of Sections 16(2), 66(1) and 72 of the Planning (Listed Buildings & Conservation Areas) Act 1990 in relation to listed buildings, and the National Planning Policy Framework 2019 (NPPF) where the assessment of heritage assets or their settings is being considered (Paragraphs 184, 189 and 190).

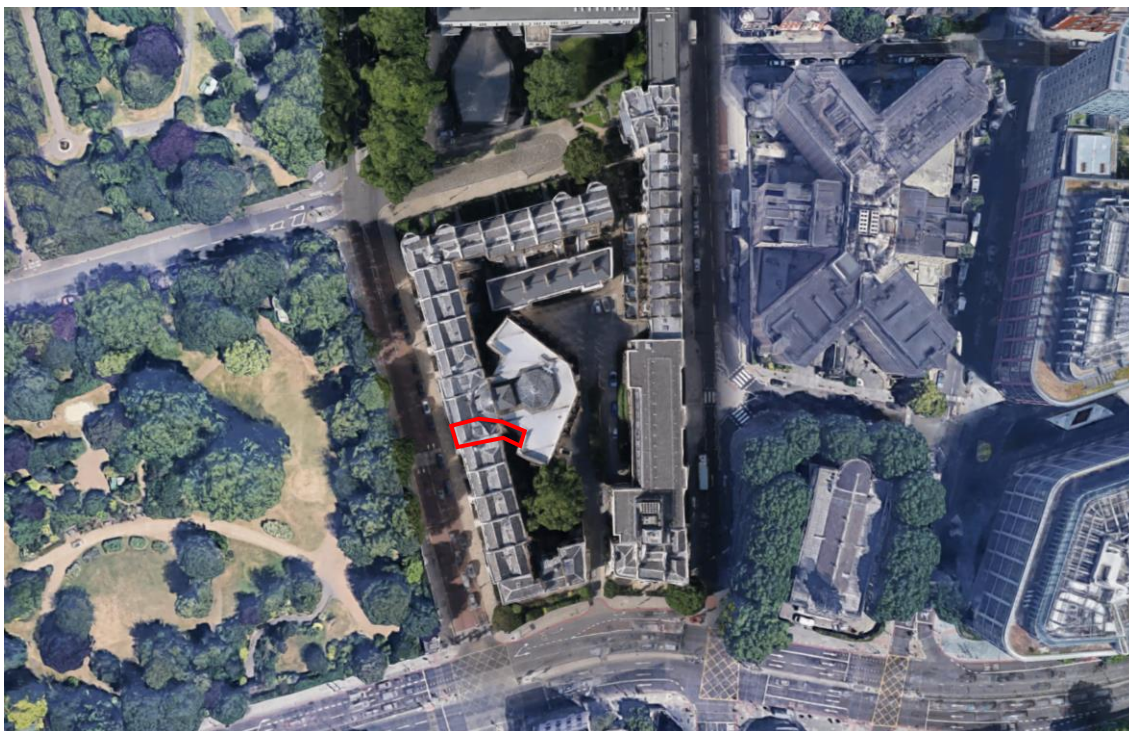


Figure 1 Aerial map showing the indicative location of the site at the south east of Regent's Park and north of Marylebone Road. Google Maps, 2019.

## 2.0 Heritage Policy and Guidance Summary

### National Policy

#### Planning (Listed Buildings & Conservation Areas) Act 1990

- 2.1 The primary legislation relating to Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings & Conservation Areas) Act 1990.
- Section 16(2) states *“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) reads: *“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, 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”*.
  - In relation to development within Conservation Areas, Section 72(1) reads: *“Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”*

#### National Planning Policy Framework (2019)

- 2.2 The revised National Planning Policy Framework (NPPF) was published on 19<sup>th</sup> February 2019, replacing the previous published 2012 and 2018 frameworks. With regard to the historic environment the over-arching aim of the policy remains in line with philosophy of the 2012 framework, namely that *“our historic environments... can better be cherished if their spirit of place thrives, rather than withers.”* The relevant policy is outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’.
- 2.3 This chapter reasserts that heritage assets can range from sites and buildings of local interest to World Heritage Sites considered to have an Outstanding Universal Value. The NPPF subsequently requires these assets to be conserved in a *“manner appropriate to their significance”* (Paragraph 184).
- 2.4 NPPF directs local planning authorities to require an applicant to *“describe the significance of any heritage assets affected, including any contribution made by their setting”* and the level of detailed assessment should be *“proportionate to the assets’ importance”* (Paragraph 189).
- 2.5 Paragraph 190 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, *“to avoid conflict between the heritage asset’s conservation and any aspect of the proposal”*. This paragraph therefore results in the need for an analysis of the impact of a proposed development on the asset’s relative significance, in the form of a Heritage Impact Assessment.
- 2.6 Paragraph 193 requires that *“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 (and the more important the asset, the greater the weight should be). This is*



*irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*

2.7 It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, *“clear and convincing justification”* (Paragraph 194). This paragraph outlines that substantial harm to grade II listed heritage assets should be exceptional, rising to ‘wholly exceptional’ for those assets of the highest significance such as scheduled monuments, Grade I and grade II\* listed buildings or registered parks and gardens as well as World Heritage Sites.

2.8 In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 195 states the following:

*“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- a. the nature of the heritage asset prevents all reasonable uses of the site; and*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.”*

2.9 The NPPF therefore requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of proposals which would result in *“less than substantial harm”*, paragraph 196 provides the following:

*“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, where appropriate, securing its optimum viable use.”*

2.10 It is also possible for proposals, where suitably designed, to result in no harm to the significance of heritage assets.

2.11 In the case of non-designated heritage assets, Paragraph 197 requires a Local Planning Authority to make a *“balanced judgement”* having regard to the scale of any harm or loss and the significance of the heritage asset.

2.12 The NPPF therefore recognises the need to clearly identify relative significance at an early stage and then to judge the impact of development proposals in that context.

2.13 With regards to conservation areas and the settings of heritage assets, paragraph 200 requires Local Planning Authorities to look for opportunities for new development, enhancing or better revealing their significance. While it is noted that not all elements of a conservation Area will necessarily contribute to its significance, this paragraph states that *“proposals that preserve those elements of a setting that make a positive contribution to the asset (or better reveal its significance) should be treated favourably.”*

## **Planning Practice Guidance (PPG) (2014)**

- 2.14 The Planning Practice Guidance (PPG) is a companion to the NPPF, replacing a large number of foregoing Circulars and other supplementary guidance. It is planned that this document will be updated to reflect the revised NPPF in due course and the Historic Environment section was most recently updated in July 2019.
- 2.15 In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance, and explains how the tests of harm and impact within the NPPF are to be interpreted.
- 2.16 In particular, the PPG notes the following in relation to the evaluation of harm: “In determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest.” (Ref ID: 18a-018-20190723).

### Historic England ‘Conservation Principles: Policies and Guidance’ 2008



- 2.17 Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of England’s historic environment, including changes affecting significant places. The guide sets out six high-level principles:
- “*The historic environment is a shared resource*”
  - *Everyone should be able to participate in sustaining the historic environment*
  - *Understanding the significance of places is vital*
  - *Significant places should be managed to sustain their values*
  - *Decisions about change must be reasonable, transparent and consistent*
  - *Documenting and learning from decisions is essential*”
- 2.18 ‘Significance’ lies at the core of these principles, the sum of all the heritage values attached to a place, be it a building, an archaeological site or a larger historic area such as a whole village or landscape. The document sets out how heritage values can be grouped into four categories:
- “**Evidential value:** *the potential of a place to yield evidence about past human activity*”
  - **Historic value:** *the ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative.*
  - **Aesthetic value:** *the ways in which people draw sensory and intellectual stimulation from a place*
  - **Communal value:** *the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory”.*



2.19

It states that:

*“New work or alteration to a significant place should normally be acceptable if:*

- a. There is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place;*
- b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed;*
- c. the proposals aspire to a quality of design and execution which may be valued now and in the future;*
- d; the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future” (Page 58)”.*

#### **Historic England Advice Note 2 ‘Making Changes to Heritage Assets’ (February 2016)**

2.20

This document provides advice in relation to aspects of addition and alteration to heritage assets:

*“The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting” (paragraph 41).*

#### **Historic England: Historic Environment Good Practice Advice (GPA) in Planning Note 2 ‘Managing Significance in Decision-Taking in the Historic Environment’ (March 2015)**

2.21

This advice note sets out clear information to assist all relevant stake holders in implementing historic environment policy in the NPPF (NPPF) and the related guidance given in the National Planning Practice Guidance (NPPG). These include: *“assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness” (para 1).*

2.22

Paragraph 52 discusses ‘Opportunities to enhance assets, their settings and local distinctiveness’ that encourages development: *“Sustainable development can involve seeking positive improvements in the quality of the historic environment. There will not always be opportunities to enhance the significance or improve a heritage asset but the larger the asset the more likely there will be. Most conservation areas, for example, will have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation”.*

#### **Historic England The Setting of Heritage Assets Historic Environment Good Practice Advice (GPA) in Planning (second Edition) Note 3 (December 2017)**

2.23

This document presents guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas and landscapes. It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting. The suggested staged approach to taking decisions on setting can also be used to assess the contribution of views to the significance of heritage assets.



2.24 Page 2, states that *“the extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.”*

2.25 The document goes on to set out ‘A staged approach to proportionate decision taking’ provides detailed advice on assessing the implications of development proposals and recommends the following broad approach to assessment, undertaken as a series of steps that apply equally to complex or more straightforward cases:

- *“Step 1 - identify which heritage assets and their settings are affected;*
- *Step 2 - Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;*
- *Step 3 - assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;*
- *Step 4 - explore ways to maximise enhancement and avoid or minimizing harm;*
- *Step 5 - make and document the decision and monitor outcomes.”* (page 8)

#### **Historic England ‘Analysing Significance in Heritage Assets Advice Note 12’ (October 2019)**

2.26 This document provides guidance on the National Planning Policy Framework requirement for applicants to describe heritage significance in order to aid local planning authorities’ decision-making. It reiterates the importance of understanding the significance of heritage assets, in advance of developing proposals. This advice note outlines a staged approach to decision-making in which assessing significance precedes the design and also describes the relationship with archaeological desk-based assessments and field evaluations, as well as with Design and Access Statements.

2.27 The advice in this document, in accordance with the NPPF, emphasises that the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance. This advice also addresses how an analysis of heritage significance could be set out before discussing suggested structures for a statement of heritage significance.

### **Regional Policy**

#### **The London Plan: The Spatial Development Strategy for London consolidated with alterations since 2011 (2016)**

2.28 The London Plan sets out the overall strategic plan for the development of London until 2036. The document was published in March 2016. The most relevant policies are as follows:

2.29 Policy 7.4 Local Character:

*“Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area’s visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.*

*Buildings, streets and open spaces should provide a high quality design response that:*

- *has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass*
- *contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area*
- *is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings.*
- *allows existing buildings and structures that make a positive contribution to the character or a place to influence the future character of the area*
- *is informed by the surrounding historic environment”.*

## 2.30 Policy 7.6 Architecture:

*“Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context. Buildings and structures should:*

- *be of the highest architectural quality*
- *be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm*
- *comprise details and materials that complement, not necessarily replicate, the local architectural character*
- *not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings.*
- *incorporate best practice in resource management and climate change mitigation and adaption*
- *provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces*
- *be adaptable to different activities and land uses, particularly at ground level*
- *meet the principles of inclusive design*
- *optimise the potential of sites”*

## 2.31 Policy 7.8 Heritage Assets and Archaeology:

*“London’s heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.*

*Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site’s archaeology.*

*Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.*

*Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials, and architectural detail.*

*New development should make provision for the protection of archaeological resources, landscapes and significance memorials. The physical assets should, where possible, be made available to the public onsite.*

*Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset”.*

2.32 Policy 7.9 Heritage-led Regeneration:

*“Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm.*

*The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality”*

**Emerging Policy: The New London Plan**

2.33 Examination in Public opened on 15<sup>th</sup> January 2019. Although not yet adopted, the new London Plan is a material consideration on planning decisions. The following policies are relevant to heritage and this application.

2.34 Policy D1 London’s form and characteristics

A. *Development Plans, area-based strategies and development proposals should ensure the design of places addresses the following requirements:*

*Form and layout*

- 1) *use land efficiently by optimising density, connectivity and land use patterns*
- 2) *enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions*

*Quality and character*

- 12) *respond to the existing character of a place by identifying the special and valued features that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute to the local character*
- 13) *be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.*

2.35 Policy HC1 Heritage conservation and growth

A. *Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.*

*B. Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:*

*1) setting out a clear vision that recognises and embeds the role of heritage in place-making*

*2) utilising the heritage significance of a site or area in the planning and design process*

*3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place*

*4) delivering positive benefits that sustain conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.*

*Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.*

## **Local Policy**

### **Camden Local Plan (2017)**

2.36 The Camden Local Plan (2017) outlines plans for development and forms the basis for planning decisions in the borough. The document was adopted by the council on the 3rd July 2017 and replaces the Core Strategy and Camden Development Policies documents. The relevant policies are set out within this document are:

2.37 Policy D1: Design

"The Council will seek to secure high quality design in development. The Council will require that development :

- a) respects local context and character;
- b) preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;..."

2.38 Policy D2: Heritage

*"The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.*

#### *Designated heritage assets*

*Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation*

areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site;
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
- c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

#### Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. 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. 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 that 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.

#### Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. 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 significance of a listed building through an effect on its setting...

#### Other heritage assets and non-designated heritage assets

The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.

The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset."

## Regent's Park Conservation Area Appraisal and Management Strategy (July 2011)

- 2.39 The Regent's Park Conservation Area was designated in July 1969. The west of the Park was designated by Westminster Council and the east by Camden Council. The conservation area was extended in 1971, 1985 and 2011. The current Conservation Area Appraisal and Management Strategy was formally adopted by the council in July 2011.
- 2.40 The site is located within *Character Zone 1: The Regent's Park and Terraces fronting the park, and their mews*. The key characteristics of this area is summarised as below:
- This character area is at the transition of park and terrace. The eastern part of the Park that lies within the conservation area contains the Broadwalk, and Nesfield's Avenue Gardens of 1863 at its southern end, which lie on the boundary with Westminster City Council. The buildings at the park's edge form a triumphant classical route; buildings with giant orders and sculpture to be seen from a distance and to impress. The gates, metalwork, paving and stone details all contribute to the quality of the area.*
- 2.41 The terraces within the conservation area are an important feature which:
- have the appearance of palaces on a triumphal route. The line of terraces extends beyond this conservation area, around the Outer Circle of the park; and the overall development continues to the south, to Regent's Crescent and ultimately down Regent Street to the site of Carlton House above the Mall. The terraces in this conservation area should be understood in the context of this whole composition.*
- 2.42 Park Square East and the Diorama mark the end of the route from Carlton House to the Park. Park Square East:
- lines the route from the park entrance to the Outer Circle and faces the Park Square Gardens. In the centre of the terrace (number 18) the projecting centre bay was the double entrance to the Diorama designed by A. C. Pugin; originally constructed as a diorama in 1823, it closed in 1851 and was converted to a Baptist Chapel at the expense of Sir Samuel Morton Peto. The polygonal stock-brick building is hidden behind the terrace and is best viewed from Peto Place. The exterior survives, but little of the interior although what is believed to be the masonry base of the pivot on which the original internal structure was balanced was retained in the conversion. The building is converted to offices, renovated in 1988, and is currently occupied by the Prince of Wales's Trust.*



## 3.0 Methodology

### Heritage Assets

- 3.1 A heritage asset is defined within the National Planning Policy Framework as
- a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing) (NPPF Annex 2: Glossary).*
- 3.2 To be considered a heritage asset *“an asset must have some meaningful archaeological, architectural, artistic, historical, social or other heritage interest that gives it value to society that transcends its functional utility. Therein lies the fundamental difference between heritage assets and ordinary assets; they stand apart from ordinary assets because of their significance – the summation of all aspects of their heritage interest.”* (‘Managing Built Heritage: The Role of Cultural Values and Significance’ Stephen Bond and Derek Worthing, 2016.)
- 3.3 ‘Designated’ assets have been identified under the relevant legislation and policy including, but not limited to: World Heritage Sites, Scheduled Monuments, Listed Buildings, and Conservation Areas. ‘Non-designated’ heritage assets are assets which fall below the national criteria for designation.
- 3.4 The absence of a national designation should not be taken to mean that an asset does not hold any heritage interest. The Planning Policy Guidance (PPG) states that *“non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.”* (Paragraph: 039 Reference ID: 18a-039-20190723)
- 3.5 The PPG goes on to clarify that *“a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.”*

### Meaning of Significance

- 3.6 The concept of significance was first expressed within the 1979 Burra Charter (Australia ICOMOS, 1979). This charter has periodically been updated to reflect the development of the theory and practice of cultural heritage management, with the current version having been adopted in 2013. It defines cultural significance as the *“aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. Places may have a range of values for different individuals or groups”* (Page 2, Article 1.2)
- 3.7 The NPPF (Annex 2: Glossary) also defines significance as *“the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological,*



*architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."*

- 3.8 Significance can therefore be considered to be formed by "*the collection of values associated with a heritage asset.*" ('Managing Built Heritage: The Role of Cultural Values and Significance' Stephen Bond and Derek Worthing, 2016.)

### **Assessment of Significance/Value**

- 3.9 It is important to be proportionate in assessing significance as required in both national policy and guidance as set out in paragraph 189 of NPPF.
- 3.10 The Historic England document 'Conservation Principles' states that "*understanding a place and assessing its significance demands the application of a systematic and consistent process, which is appropriate and proportionate in scope and depth to the decision to be made, or the purpose of the assessment.*"
- 3.11 The document goes on to set out a process for assessment of significance, but it does note that not all of the stages highlighted are applicable to all places/ assets.
- Understanding the fabric and evolution of the asset;
  - Identify who values the asset, and why they do so;
  - Relate identified heritage values to the fabric of the asset;
  - Consider the relative importance of those identified values;
  - Consider the contribution of associated objects and collections;
  - Consider the contribution made by setting and context;
  - Compare the place with other assets sharing similar values;
  - Articulate the significance of the asset.
- 3.12 At the core of this assessment is an understanding of the value/significance of a place. There have been numerous attempts to categorise the range of heritage values which contribute to an asset's significance. Historic England's '*Conservation Principles*' sets out a grouping of values as follows: evidential, aesthetic, historic and communal values.
- 3.13 Value-based assessment should be flexible in its application, it is important not to oversimplify an assessment and to acknowledge when an asset has a multi-layered value base, which is likely to reinforce its significance.

### **Contribution of setting/context to significance**

- 3.14 In addition to the above values, the setting of a heritage asset can also be a fundamental contributor to its significance - although it should be noted that 'setting' itself is not a designation.

The value of setting lies in its contribution to the significance of an asset. For example, there may be instances where setting does not contribute to the significance of an asset at all.

- 3.15 Historic England's Conservation Principles defines *setting* as “an established concept that relates to the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape.”
- 3.16 It goes on to state that “context embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places” (page 39).
- 3.17 In order to understand the role of setting and context to decision-making, it is important to have an understanding of the origins and evolution of an asset, to the extent that this understanding gives rise to significance in the present. Assessment of these values is not based solely on visual considerations but may lie in a deeper understanding of historic use, ownership, change or other cultural influence – all or any of which may have given rise to current circumstances and may hold a greater or lesser extent of significance.
- 3.18 The importance of setting depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation. It is important to note that impacts that may arise to the setting of an asset do not, necessarily, result in direct or equivalent impacts to the significance of that asset(s).

### Assessing Impact

- 3.19 It is evident that the significance/value of any heritage asset(s) requires clear assessment to provide a context for, and to determine the impact of, development proposals. Impact on that value or significance is determined by first considering the sensitivity of the receptors identified which is best expressed by using a hierarchy of value levels.
- 3.20 There are a range of hierarchical systems for presenting the level of significance in use; however, the method chosen for this project is based on the established ‘James Semple Kerr method’ which has been adopted by Historic England, in combination with the impact assessment methodology for heritage assets within the *Design Manual for Roads and Bridges* (DMRB: HA208/13) published by the Highways Agency, Transport Scotland, the Welsh Assembly Government and the department for Regional Development Northern Ireland. This ‘value hierarchy’ has been subject to scrutiny in the UK planning system, including Inquiries, and is the only hierarchy to be published by a government department.
- 3.21 The first stage of our approach is to carry out a thoroughly researched assessment of the significance of the heritage asset, in order to understand its value:

SIGNIFICANCE	EXAMPLES
<b>Very High</b>	World Heritage Sites, Listed Buildings, Scheduled Monuments and Conservation Areas of outstanding quality, or built assets of acknowledged exceptional or international importance, or assets which can contribute to international research objectives.

	Registered Parks & Gardens, historic landscapes and townscapes of international sensitivity.
<b>High</b>	World Heritage Sites, Listed Buildings, Scheduled Monuments, Conservation Areas and built assets of high quality, or assets which can contribute to international and national research objectives.  Registered Parks & Gardens, historic landscapes and townscapes which are highly preserved with excellent coherence, integrity, time-depth, or other critical factor(s).
<b>Good</b>	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) with a strong character and integrity which can be shown to have good qualities in their fabric or historical association, or assets which can contribute to national research objectives.  Registered Parks & Gardens, historic landscapes and townscapes of good level of interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s).
<b>Medium/ Moderate</b>	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) that can be shown to have moderate qualities in their fabric or historical association.  Registered Parks & Gardens, historic landscapes and townscapes with reasonable coherence, integrity, time-depth or other critical factor(s).
<b>Low</b>	Listed Buildings, Scheduled Monuments and built assets (including locally listed buildings and non-designated assets) compromised by poor preservation integrity and/or low original level of quality of low survival of contextual associations but with potential to contribute to local research objectives.  Registered Parks & Gardens, historic landscapes and townscapes with modest sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations.
<b>Negligible</b>	Assets which are of such limited quality in their fabric or historical association that this is not appreciable.  Historic landscapes and townscapes of limited sensitivity, historic integrity and/or limited survival of contextual associations.
<b>Neutral/ None</b>	Assets with no surviving cultural heritage interest. Buildings of no architectural or historical note.  Landscapes and townscapes with no surviving legibility and/or contextual associations, or with no historic interest.

3.22 The next stage is to assess the 'magnitude' of the impact that any proposed works may have. Impacts may be considered to be adverse, beneficial or neutral in effect and can relate to direct physical impacts, impacts on its setting, or both. Impact on setting is measured in terms of the effect that the impact has on the significance of the asset itself – rather than setting itself being considered as the asset.

MAGNITUDE OF IMPACT	TYPICAL CRITERIA DESCRIPTORS
<b>Very High</b>	<u>Adverse</u> : Impacts will destroy cultural heritage assets resulting in their total loss or almost complete destruction.  <u>Beneficial</u> : The proposals would remove or successfully mitigate existing and significant damaging and discordant impacts on assets; allow for the substantial restoration or enhancement of characteristic features.

<b>High</b>	<p><u>Adverse:</u> Impacts will damage cultural heritage assets; result in the loss of the asset's quality and integrity; cause severe damage to key characteristic features or elements; almost complete loss of setting and/or context of the asset. The assets integrity or setting is almost wholly destroyed or is severely compromised, such that the resource can no longer be appreciated or understood.</p> <p><u>Beneficial:</u> The proposals would remove or successfully mitigate existing damaging and discordant impacts on assets; allow for the restoration or enhancement of characteristic features; allow the substantial re-establishment of the integrity, understanding and setting for an area or group of features; halt rapid degradation and/or erosion of the heritage resource, safeguarding substantial elements of the heritage resource.</p>
<b>Medium</b>	<p><u>Adverse:</u> Moderate impact on the asset, but only partially affecting the integrity; partial loss of, or damage to, key characteristics, features or elements; substantially intrusive into the setting and/or would adversely impact upon the context of the asset; loss of the asset for community appreciation. The assets integrity or setting is damaged but not destroyed so understanding and appreciation is compromised.</p> <p><u>Beneficial:</u> Benefit to, or partial restoration of, key characteristics, features or elements; improvement of asset quality; degradation of the asset would be halted; the setting and/or context of the asset would be enhanced and understanding and appreciation is substantially improved; the asset would be brought into community use.</p>
<b>Minor/Low</b>	<p><u>Adverse:</u> Some measurable change in assets quality or vulnerability; minor loss of or alteration to, one (or maybe more) key characteristics, features or elements; change to the setting would not be overly intrusive or overly diminish the context; community use or understanding would be reduced. The assets integrity or setting is damaged but understanding and appreciation would only be diminished not compromised.</p> <p><u>Beneficial:</u> Minor benefit to, or partial restoration of, one (maybe more) key characteristics, features or elements; some beneficial impact on asset or a stabilisation of negative impacts; slight improvements to the context or setting of the site; community use or understanding and appreciation would be enhanced.</p>
<b>Negligible</b>	Barely discernible change in baseline conditions and/or slight impact. This impact can be beneficial or adverse in nature.
<b>Neutral</b>	Some changes occur but the overall effect on the asset and its significance is neutral.
<b>Nil</b>	No change in baseline conditions.

## 4.0 Historic Context

- 4.1 The site is located in the centre of Park Square East, to the north of Marylebone Road and south of Regent's Park. Previously the rural outskirts of London, plans to redevelop the area had begun in the eighteenth century. The New Road (now Marylebone Road) had been constructed in the 1750s to relieve east-west traffic on the Oxford road further south, and the Adam brothers had begun the development of Portland Place in the second half of the eighteenth century.
- 4.2 The area was comprehensively redeveloped in the early nineteenth century when leases in the area were returned to The Crown. In 1810 John Nash and James Morgan were commissioned to plan the development of what was then Marylebone Park, connecting to Carlton House to the south via Portland Place and Regent's Street. The plan was largely built out during the 1820s and 1830s.
- 4.3 Park Square East formed part of the southern entrance to the new Regent's Park at the north end of the triumphal route. The front (west) elevation of the terrace forms a uniform design, although the details of the buildings behind were left to the individual builder. Construction of Park Square East began before Park Square West, and nos. 17-19 were built first, completed in only four months in 1823, to designs by James Morgan and A. C. Pugin.
- 4.4 A. C. Pugin and James Morgan had been commissioned by James Arrowsmith, brother-in-law of Louis Daguerre, to create the country's first Diorama (an early form of cinema). Daguerre and Charles Bouton had created the world's first Diorama, in Paris, the previous year.
- 4.5 Pugin's original plan and elevation for nos. 17-19 and the Diorama provide some details of the intended appearance of the Park Square East elevation and the principal (first) floor of the houses at the front and Diorama at the centre and rear of the group. Nos. 17-19 form the central, projecting section of the Park Square East terrace. It is seven windows wide, with no. 18 (the entrance to the Diorama to the rear) occupying the central three bays. Visitors to the Diorama entered through the central door at the ground floor of no. 18.
- 4.6 Nos. 17 and 19 were designed as individual terraced houses and their plans mirror each other. Only two windows wide at the front, their stairwells occupy the centre of each house and they narrow to a single window's width at the rear to accommodate the Diorama's circular saloon. Accommodation was arranged over basement, ground, first, second and attic storeys, with two rooms on each floor.





Figure 2 Proposed front elevation of 17-19 Park Square East, 1823. RIBA ref: SKB246/2 in PUGIN AC.

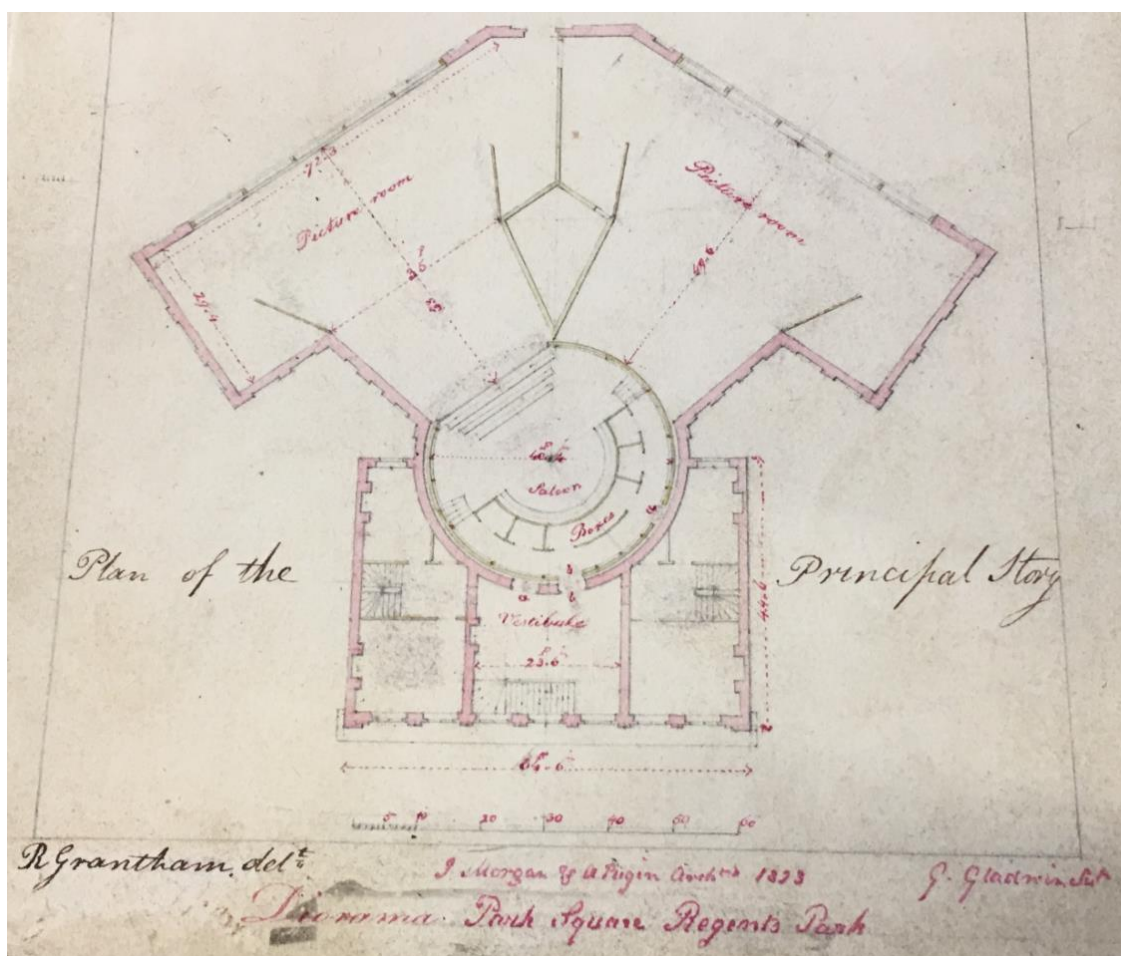


Figure 3 Proposed 'Plan of the Principal Story' of 17-19 Park Square East, including Diorama. RIBA ref: SKB246/2 in PUGIN AC.

- 4.7 Although constructed as part of the Diorama development, nos. 17 and 19 were let on separate residential leases from the Crown. (National Archives, ref: CRES 35/3533).
- 4.8 The Diorama ceased to be profitable and in 1855 was converted to a Baptist Chapel. In 1929 it was converted to a rheumatism clinic. Throughout the twentieth century, The Crown Estate (TCE) Commissioners emphasised the importance of the retention of the historic appearance of the Park square East elevation. For example, whilst negotiating the new lease in 1929 they stated:
- And it is agreed that no alterations shall be made to the external appearance of the said buildings so far as they can be seen from Park square East and the public parts of Regents Park except such alterations to the Entrance door and glass windows above as may be approved in writing by the Commissioners.*
- (National Archives, ref: CRES 35/3534).
- 4.9 It is evident the rheumatism clinic soon required more space, as in 1943 they contacted TCE Commissioners about the possibility of expanding into the adjoining houses (13-17 Park Square East). Although the scheme did not progress, the correspondence again emphasises the value given to the preservation of the Park Square East elevation. TCE's response to the Institute stated that: 'The architectural expert whom we have called in to advise us attaches high importance to the Park Square and Crescent houses as an integral part of the Nash scheme of development, and pending decisions which may be taken during the next few months I think it would be wrong to allow the three houses to be incorporated with the clinic...'. (National Archives, ref: CRES 35/3536).



Figure 4 Aerial photograph from the south-west, 1946. Whilst most houses in the terrace have M-shaped roofs with the front in mansard form, the central three buildings and the end pavilions have full height attic storeys with pitched roof behind. The rear part of the roofs of nos. 17 and 19 is restricted by the Diorama's conical rooflight. Britain From Above, ref: EAW000542.





*Figure 5 1962 photograph of the front elevation of 17-19 Park Square East. The 1850s chapel conversion of no. 18 included the removal of the original ground floor windows to create three doorways. RIBA Pix ref no.: RIBA5342.*

- 4.10 In 1950 it was considered to take on the leases of the two neighbouring houses on Park Square East (presumably nos. 17 and 19) but it was decided there were unsuitable for conversion to an inpatient department for the Institute.
  
- 4.11 A 1962 photograph of the Park Square East elevation of nos. 17-19 shows that although no. 19's principal elevation was little changed from the 1823 drawings, the cills of the attic storey windows had been dropped and casements inserted.
  
- 4.12 In 1965 Bedford College took a nine year lease of no. 18 and the Diorama building to provide more teaching accommodation. It is clear that for TCE Commissioners the historic appearance of the Park Square East elevation remained the most sensitive area of the building. The *Outline Principal Terms for a lease* for no. 18 specify the 'The Regency Character of the premises externally is at all times to be maintained and no alterations are to be made to any features to be included in a schedule annexed to the lease.' And 'The exterior of the premises as seen from Park Square East, is to be maintained as though in private residential occupation, and the windows facing Park Square are to be kept close-curtained. The entrance door from Park Square East is to be kept closed except when in use for egress and ingress to the premises.' (Royal Holloway, ref: AR/599/1).

- 4.13 In 1964/65, the College also considered taking the lease of no. 19 Park Square East. The particulars for no. 19 at this time describe it as 'one of the most attractive houses forming part of the Nash Terrace occupying a very desirable position overlooking the gardens of Park Square and conveniently situated with transport to the West End close at hand. The house would be ideal for a Medical User, with the added appeal of a low Rent, or for a person seeking a fine family house.' The accommodation comprised:
- Entrance Floor: Large entrance hall with cloak cupboard. Dining room 15'x12' with handsome Adam fireplace with mirror above. Study 14'x19' with two fitted cocktail cupboards mirror faced. A few steps lead to Library Annex with fitted bookshelves. Maids room with fitted bookshelves, is approached through a small area with wash basin. Elegant sweeping staircase with display niches, leading to*
- First Floor: Fine reception room 16'x15' overlooking the Gardens having doors to Balcony, fitted cupboards on either side of fireplace with carved mantel. Bedroom 15'x11' with concealed wash basin.*
- Second Floor: landing with storage and airing cupboards. Principal bedroom 15'x14' overlooking the Square garden. 2 fitted wardrobes, fireplace with carved mantel. Bathroom: mahogany panelled bath, wash basin, Adam wall mirror with carved surround, W.C.*
- Third floor: Landing with airing cupboard. Bedroom 3. 15'x14' overlooking the Square gardens, a section of this room has been partitioned, thus forming a large storage area. Bedroom 4. single with fitted cupboard.*
- Lower Ground Floor: very spacious kitchen with sink unit, dresser with drawers and cupboards, 2 built-in cupboards, door [to?] wine cellar and trades entrance. Pantry with range of cupboards. Maids bathroom with panelled bath and wash basin. Boiler room with gas boiler for central heating and hot water. Door to small yard and outside W.C.*

(Royal Holloway, ref: AR/599/2)

- 4.14 In 1974 13-24 (consecutive) Park Square East with attached railings were listed Grade I. The list description notes that nos. 13-16 and 20-24 had been converted to flats in c. 1986 and many original internal features were destroyed, although the principal elevation to Park Square (designed by Nash) had been largely preserved as originally constructed. See the Appendix for the full list description.

#### **1994 refurbishment**

- 4.15 In 1994 the Prince's Trust took over nos. 17-19, including the Diorama building, for their offices and undertook a major refurbishment of the buildings. Although the shell and floors were retained the majority of the internal partitions within the Diorama building were removed and nos. 17, 18 and 19 were connected internally. The works also included the reinstatement of some of the 1850s Chapel features in no. 18's entrance and vestibule, as well as reinstatement of the 1820s Park Square East entrance front. Plans submitted in 1994 show the main changes which affected no. 19 were:
- 4.16 Replacement of third floor windows to Park Square East elevation with double hung sashes 'to follow the original design';
- 4.17 Replacement of doors to nos. 18 and 19 Park Square East with a single leaf door in the central opening to match no. 17 and timber-framed sash windows to no. 18;

- 4.18 Installation of new fire surrounds and grates throughout nos. 17 and 19;
- 4.19 Refurbish existing staircases, doors, windows, chimney stacks, railings etc.

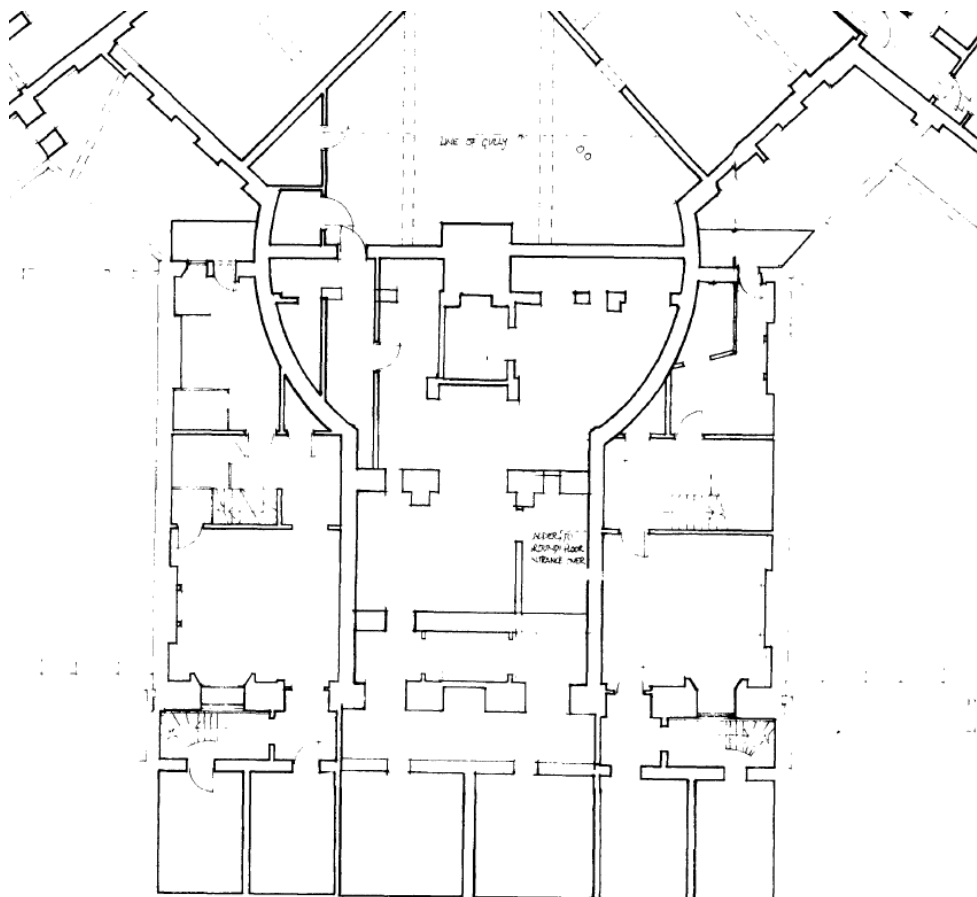


Figure 6 Existing basement of nos. 17-19, 1994. Camden planning ref: HB/9370268.

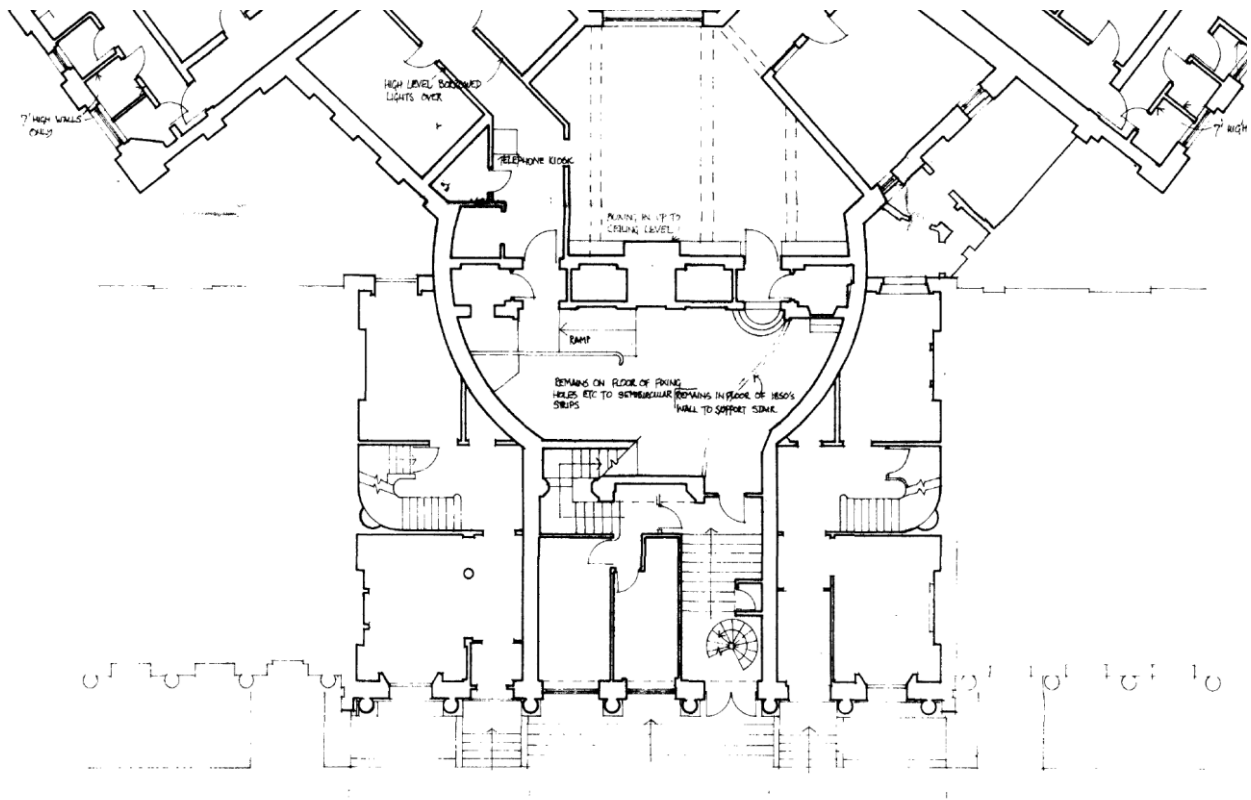


Figure 7 Existing ground floor of nos. 17-19, 1994. Camden planning ref: HB/9370268.

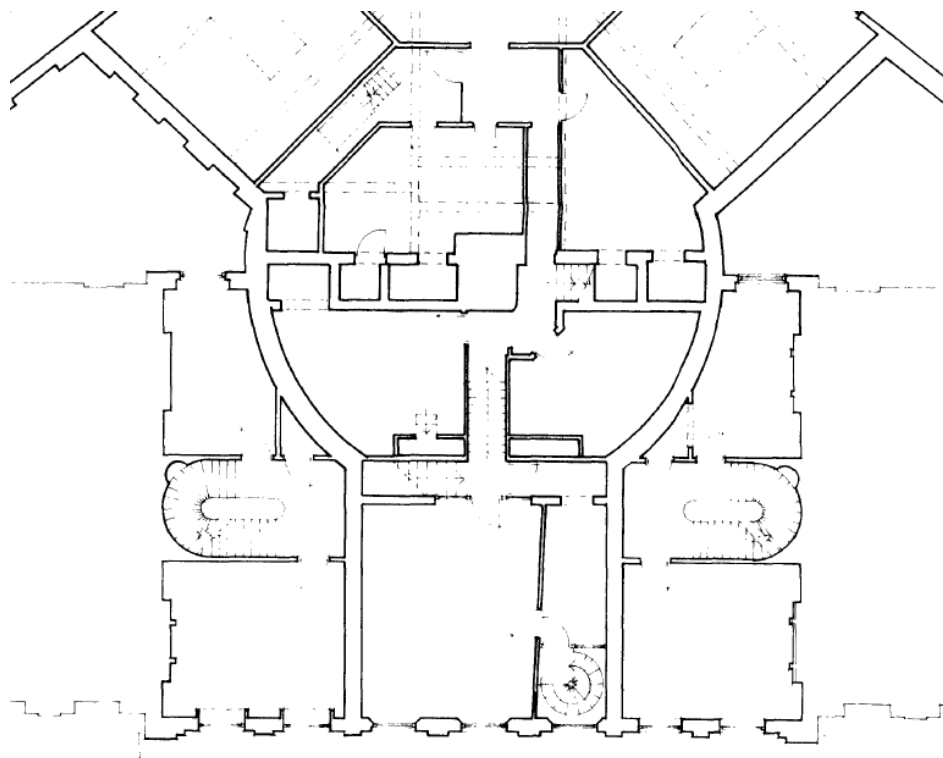


Figure 8 Existing first floor plan of nos. 17-19. Camden planning ref: HB/9370268.

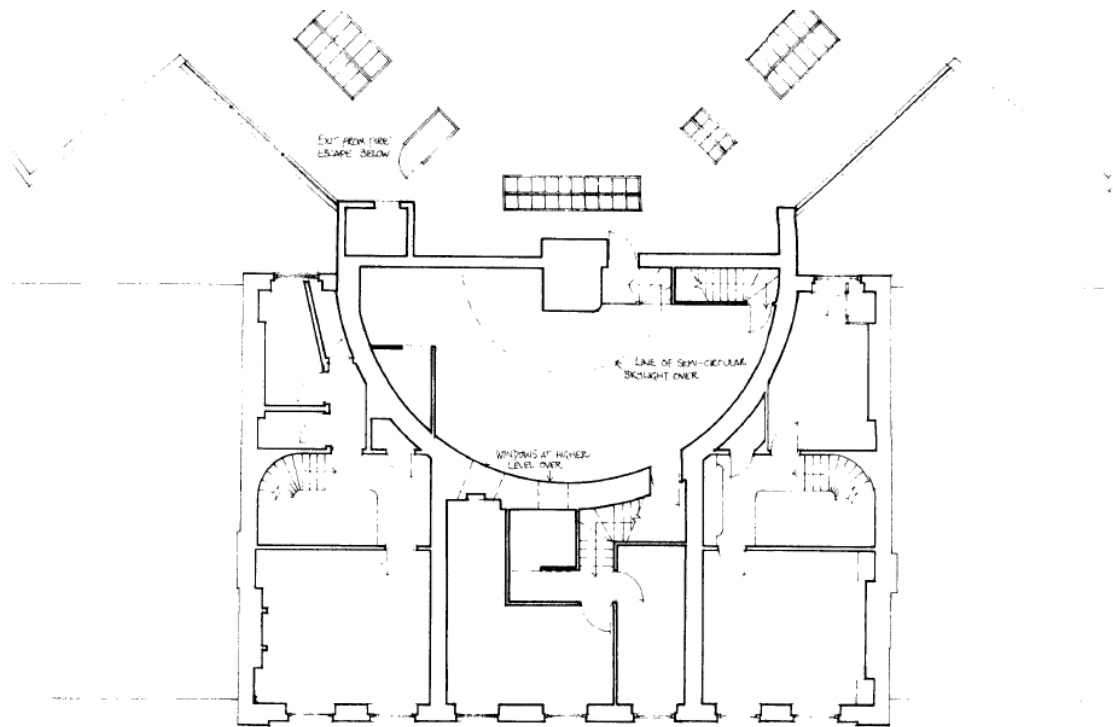


Figure 9 Existing second floor plan, 1994. Camden planning ref: HB/9370268.

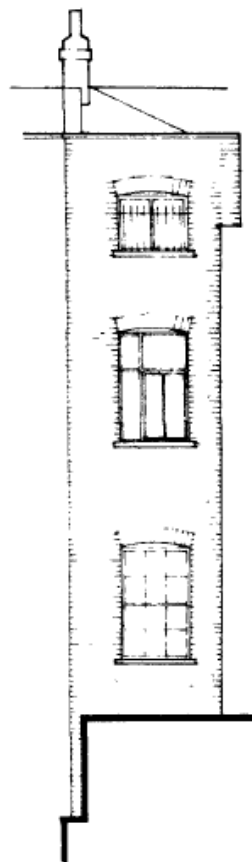


Figure 10 Existing rear elevation of no. 19, 1994. Camden planning ref: HB/9370268



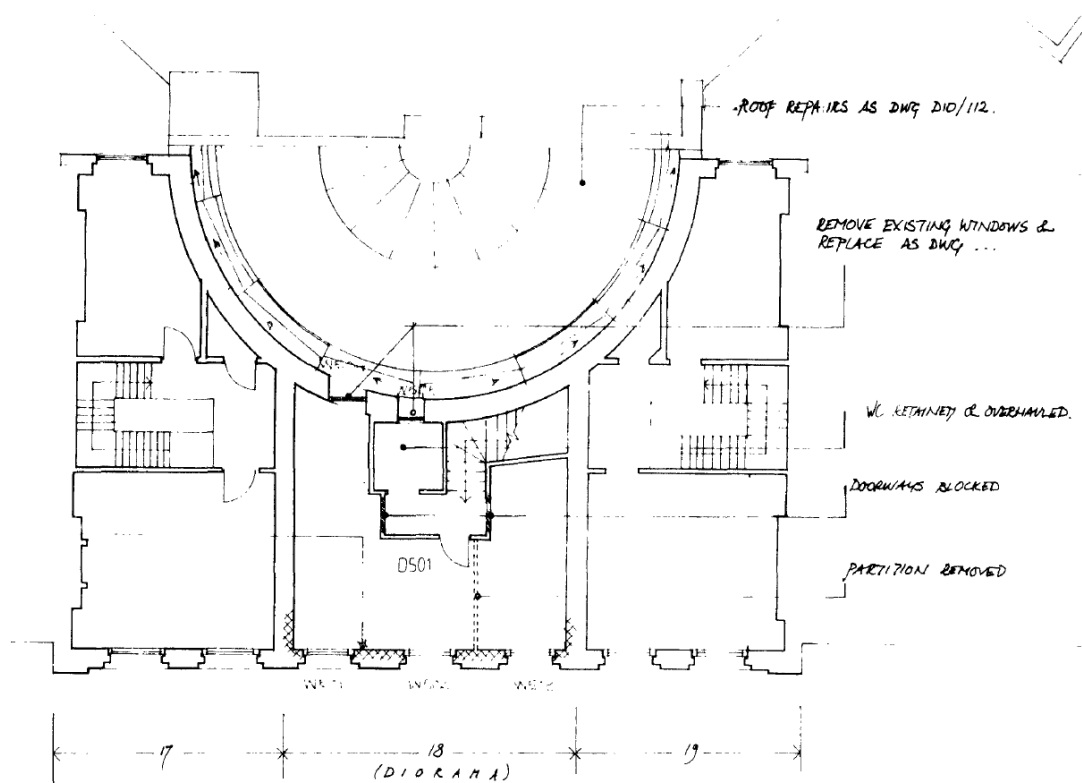


Figure 13 Proposed third floor of nos. 17-19. Camden planning ref: HB/9370268.



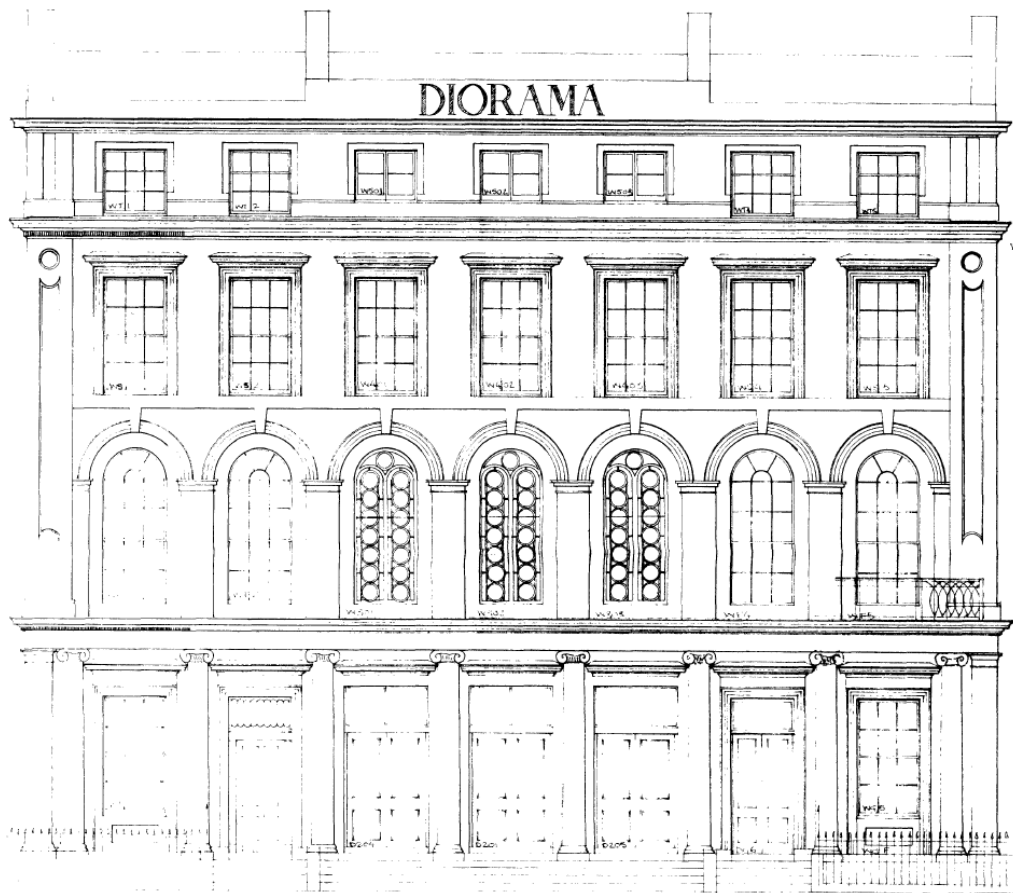


Figure 14 Existing Park Square East elevation, 1994. Camden planning ref: HB/9370268.



Figure 15 Proposed Park Square East elevation, 1994. Camden planning ref: HB/9370268.

## 5.0 Site Description

- 5.1 The site is located at the centre of the terrace on Park Square East. It occupies the two right hand bays of the projecting central seven bays of the terrace. Nos. 18 (with the Diorama building to the rear) and 19 are to the left. The projecting central portion of the Park Square East elevation is stuccoed and framed by giant pilasters at first and second floor. There are ionic columns dividing the bays at ground floor. Stone steps rise from the pavement to the front door at ground floor. The houses in the terrace have three principal storeys and an attic storey over basement.
- 5.2 Nos. 17 and 19, whilst designed as individual terraced houses, formed part of the Diorama development and their plans are dictated by the Diorama. Whilst other houses in the terrace are three windows wide, nos. 17 and 19 are only two windows wide at the front, narrowing to a single window's width at the rear to accommodate the Diorama's circular saloon. Their stairwells occupy the centre of the houses. Accommodation is arranged over basement, ground, first, second and attic storeys, with two rooms on each floor. Overall, the extant plan of no. 19 is consistent with the original 1820s plan, although some internal partitions have been inserted and connections to no. 18 created.
- 5.3 The roof is M-shaped with a lantern in the valley. The rear part of the roof is truncated by the conical rooflight over the Diorama's saloon at no. 18. The front pitch is partially concealed by the raised parapet above the attic storey.



*Figure 16 The Park Square East elevation of nos. 17-19, which projects forward of the rest of the terrace. No. 19 occupies the two right hand bays.*

- 5.4 Nos. 18 and 19 are connected at basement, ground, second and third floors. The connections between nos. 17 and 18, 18 and 19, and no. 18 and the Diorama building to the rear are complicated by changing floor levels between the Park Square East terrace at the front and the Diorama building to the rear. At second floor there is access from the landing and the front room into no. 18, via short flights of stairs up.
- 5.5 Internally, whilst much of the original floor plan remains, there is very little original fabric remaining. There are some exceptions with the survival of plain rail and stile and moulded wainscoting to the stairwell at ground and basement levels but on the whole, the majority of original cornices and skirtings have been altered or lost over time.
- 5.6 The building is entered through the front door, approached by stone steps up from the pavement, over the basement area. Cast iron area railings continue up either side of the steps. The front door dates from the 1990s. The ground floor hallway is divided by internal doors which are not original, with fanlight over. There is a door from the hall into no. 18 which was inserted in the 1990s.



*Figure 17 Door from the hall to no. 18.*





*Figure 18 and Figure 19 Ground floor hallway.*

- 5.7 The front and rear rooms are in their original form, with central chimney breasts in the side wall with 1990s fireplaces. There are moulded skirtings and cornice. One sash window to the front elevation with architraved frame and wooden shutters. To the rear is a glazed door to the rear garden. The ground floor is carpeted throughout.



*Figure 20 Front ground floor room.*



*Figure 21 Rear ground floor room.*

- 5.8 There is a small garden to the rear which is bounded by the Diorama building to the east and north, with windows from the Diorama building into the garden. There are brick boundary walls to the north. There is a grill over the basement lightwell.

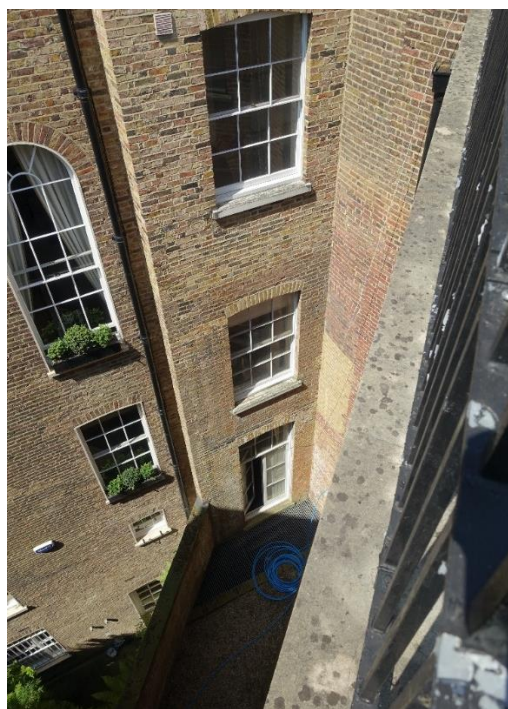
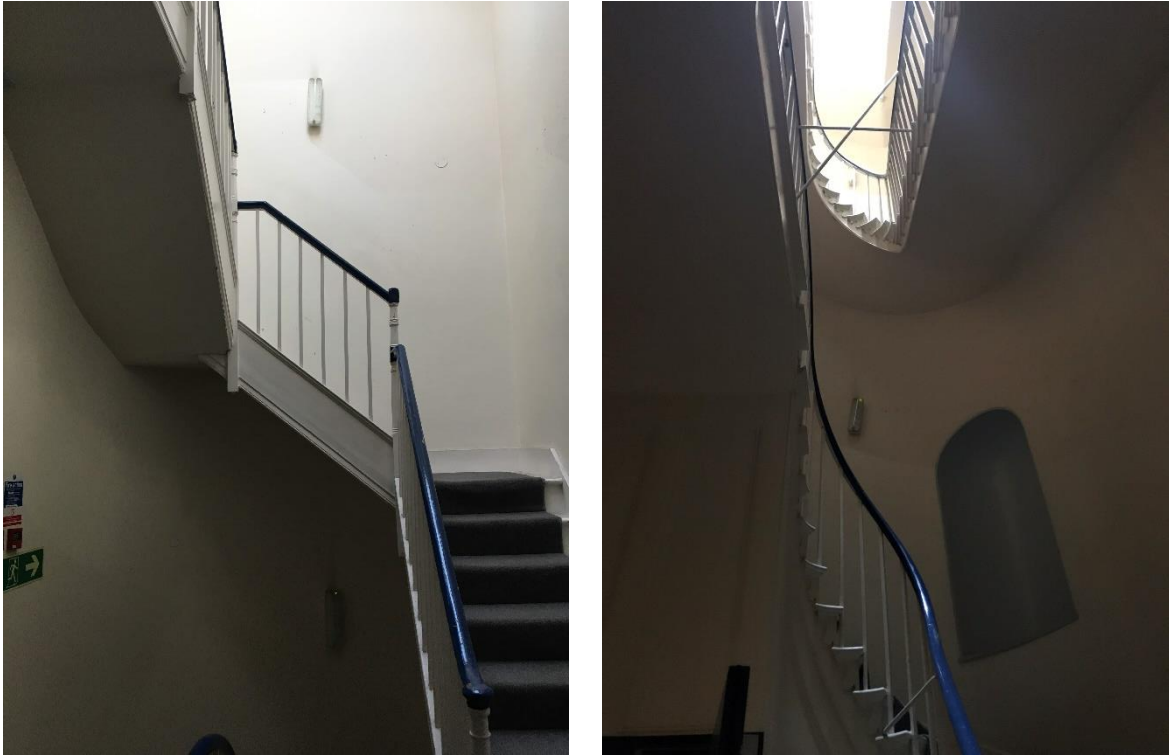


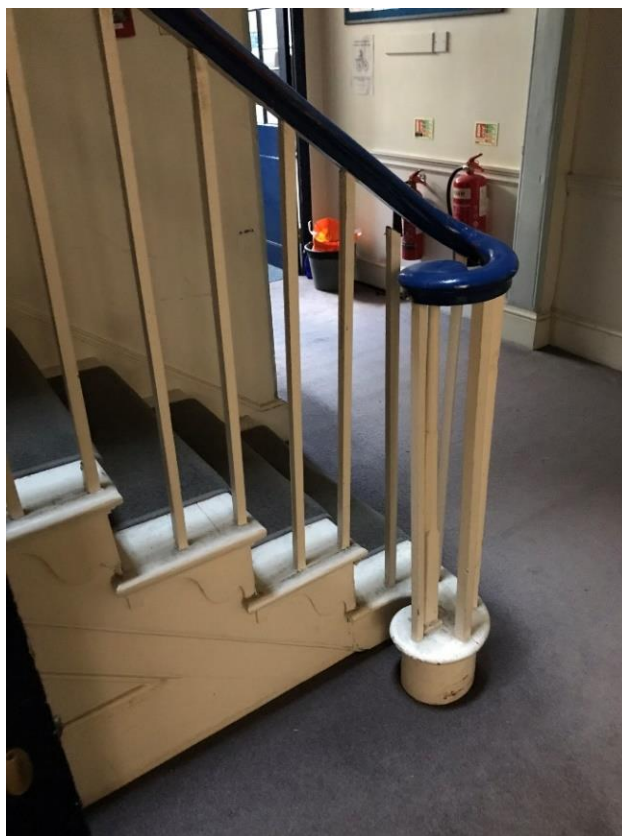
Figure 22 (left) Ground floor rear area against the Diorama building, note evidence of former outbuilding against far wall. Figure 23 (right) Rear elevation of no. 19.

- 5.9 The staircase occupies the centre of the house and is original, although with some balusters replaced. The scroll to the bottom step which supports the newel post and carved tread ends are typical of the late-eighteenth and early nineteenth century. There is a continuous, curved balustrade from ground to second floor. The staircase to the principal floors is curved with niches in the wall between ground and first floor. The staircase to the third floor is rectangular in plan. There is a rooflight above the staircase. There is wood panelling to the staircase at basement and ground floors. The door at the top of the basement stairs is modern.



*Figure 24 Staircase from second to third floor (left) and ground to first floor (right).*





*Figure 25 Staircase at ground floor.*



*Figure 26 Rail and style timber panelling in the staircase between ground and basement levels.*



- 5.10 There are stone flags on the basement floor of the stairwell and a modern shower room under the staircase. There is also a door into no. 18 in this location. The front basement room has modern boarded ceilings with large office-style lights and boxed services. There is a large fireplace opening in the chimney breast. There is an internal window to the staircase from this room.
- 5.11 The rear room has been divided to create a small W.C.. The chimney breast survives behind kitchen fittings.



*Figure 27 Front basement room, with institutional fit-out (left). Internal window to the staircase (right).*



*Figure 28 (left) Shower room under the stairs at basement level. Figure 29 (right) W.C. in the rear basement room with boxed-in pipes over the toilet.*



*Figure 30 Rear basement room*

- 5.12 There is a small lightwell to the rear of the basement. There are two vaults under the pavement accessed from the front basement area.



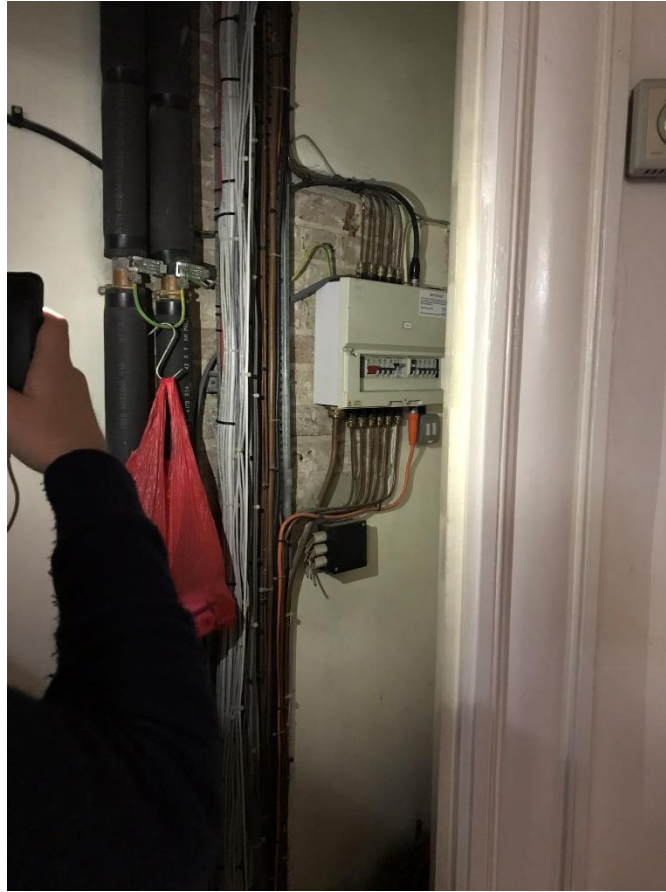
*Figure 31 Vault under pavement from the front basement area.*

- 5.13 The first floor, which would have been the principal level, the front room occupies the full width of the building and has two sash windows with wooden shutters. It has more elaborate cornice and deeper skirting than at other floors. The 1990s fire surround is also more elaborate. Carpets throughout.
- 5.14 At second floor openings have been created into no. 18 from the landing and the front room. The floor level of no. 18 (over the double height entrance hall) is higher than that of no. 17 so short flights of stairs have been inserted. The rear room at second floor has been divided to create a separate W.C.. The chimney breast is evident behind kitchen units.
- 5.15 At third floor there is also access to no. 18 from the landing and front room, although the floors are at the same level here.



*Figure 32 1990s fireplace in the front third floor room.*

- 5.16 At basement to second floor there are cupboards against the curved wall of the Diorama's saloon accessed via a door from each landing. There is no cupboard at third floor, although there is a door from the landing in the same location. These cupboards have some lath and plaster walls between the cupboard and the rear rooms. The walls of the Diorama saloon in the cupboards are plastered directly onto masonry.



*Figure 33 Ground floor cupboard against the Diorama's saloon.*



## 6.0 Significance Assessment

- 6.1 The site forms part of the Grade I listed terrace 13-24 (consecutive) Park Square East. However, there are parts of the site which are considered to retain more historic or architectural interest.
- 6.2 The principal elevation on Park Square East forms part of the Nash planning of the Regent's Park and connecting to the processional route to the south. The key buildings which remain from this nationally significant phase of town planning are Grade I listed, including the houses around Park Crescent, Church of All Souls on Langham Place and Carlton House Terrace. These buildings are associated with the Crown-led redevelopment of the area and the influential Regency architect John Nash. This elevation, as part of the wider Park Square East elevation, is therefore considered to be the part of the site of highest significance.
- 6.3 The rest of the original building, designed and built by A. C. Pugin and James Morgan in 1823, is also considered to be of high significance, albeit less than the principal elevation.
- 6.4 The existing floor plans of no. 19 are largely similar to the original plan, and some important original features remain, notably the central staircase and chimney breasts throughout the house. The floor plan throughout the building therefore provides evidence of the original layout of the house and therefore of domestic architectural taste and living expectations of the upper classes at the time.
- 6.5 Although the planning history, archival research and on-site inspection indicate the majority of windows have been replaced, their materials, style and scale are generally consistent with the originals and so, although their fabric is not of historic interest, they help to maintain the original appearance of the interior and exterior of the houses. All the fire surrounds were installed during the 1990s and are of no particular historic interest in their own right, although they contribute to an appreciation of the historic appearance of the principal rooms.
- 6.6 The most recent phase of works, in the 1990s, restored some prominent historic features, including the proportions of the attic windows and front door to the Park Square East elevation. Whilst this fabric is not of interest in its own right, it does make an important contribution to the overall appearance of the listed building.
- 6.7 The 1990s office conversion, including connecting between nos. 17 and 18 at the upper floors, are confused by changing floor levels and have obscured the original separation between the buildings and detract from the historic interest of the building as a separate dwelling.

### **Regent's Park Conservation Area**

- 6.8 Regent's Park Conservation Area includes the eastern part of Nash's early nineteenth century Regent's Park development. This nationally important piece of town planning formed part of a wider scheme which extended to the south and connected to wider infrastructure such as the canal and a market and included urban, suburban and semi-rural features.
- 6.9 Although much redevelopment of buildings has taken place since the original construction, the overall plan has survived. Where buildings do survive to Nash's original design they are highly designated.
- 6.10 The site forms part of the terrace on Park Square East. The terrace survives from the original Nash plan and the front elevation forms part of the palace-like elevation facing Park Square and opposite Park Square West at the south of Regent's Park and north end of the triumphal route



from Carlton House Terrace. As such, the style, scale and materials of the front elevation form an important part of the Nash plan and as part the terrace the site makes a good contribution to the significance of the conservation area.

## 7.0 Proposals and Assessment of Impact

- 7.1 The development proposals seek to return no. 19 to its original use as a single dwelling house. This would involve sensitive refurbishment of the entire building, including the retention of the features of most heritage significance, including the principal elevation on Park Square East, the historic plan, central staircase and chimney breasts throughout. These elements of the building make the most important contribution to the significance of the listed building and conservation area. The proposals also include a rear extension and incorporation of part no. 18.
- 7.2 Pre-application discussions have been held with Camden's conservation and design officers (written responses received in March 2018 and August 2019), Historic England Inspector (on-site meeting held in October 2019) and the Regent's Park Conservation Area Advisory Committee (RPCAAC) (written responses received in April and November 2019). Each body supported the principle of the proposals and stated the heritage benefit of returning the house to residential use.
- 7.3 Historic England had no objections to the proposals. Questions about the detailed design were raised by Camden and RPCAAC, which have been addressed through further research and design development.

### Residential conversion

- 7.4 In April 2019, before detailed designs had been developed, RPCAAC voiced 'concern that the insertion of services, as well as kitchens and bathrooms should not damage surviving spatial relationships and details.' Through detailed design, the proposals have taken care to retain, and in places reinstate, the original details and plan of the house. This includes the removal of a later partition in the rear second floor room, the blocking of access to no. 18 at basement and ground floor, and reinstatement of the cupboard against the Diorama saloon at third floor.
- 7.5 To reduce the impact of domestic services on no. 19, the incorporation of one of the vaults and part of the second and third floors of no. 18 Park Square East would enable the removal of bathrooms and other domestic services from the main house, thereby reducing the need to subdivide the historic floor plan of no.17.
- 7.6 The existing connections between nos. 17, 18 and 19 would also be altered. The 1990s doorways between nos. 18 and 19 at basement and ground floor would be blocked to reinstate the original size of these floors. The separation would be retained at first floor. At second floor the existing doorways between nos. 18 and 19 would be reconfigured. The floor level of no. 18 would be lowered to be consistent with that of no. 19 and the rest of the terrace.
- 7.7 The existing second and third floor plans of no. 18 date from the late-twentieth century and are of less interest than that of no. 19. They are open plan apart from a corridor at each floor against the Diorama saloon, and were joined to nos. 17 and 19 during the 1990s. The proposed arrangement would enable the most logical layout of the upper floors of nos. 17, 18 and 19 by dividing no. 18 between nos. 17 and 19. It would also enable the bathrooms of the proposed dwelling to be located in a part of no. 18 which retains less historic fabric and evidence of its historic plan, allowing the reinstatement of the original floor plan of no. 19 at these levels. The proposed layout has been carefully arranged to ensure no internal walls cut across the Park Square East windows. In August 2019, following further design development, Camden supported these proposals, stating that the proposed incorporation of part of the second and third floors of no. 18 would be the most 'logical layout and subdivision'.
- 7.8 The proposed reduction in communication between nos. 18 and 19, through the blocking of doorways at basement and ground floor and subdivision of no. 18 at second and third floors,

would return the building's original plan to most floors whilst enabling the removal of potentially invasive services to areas which retain less historic fabric. This would result in a minor beneficial impact on the listed building's significance.

- 7.9 Although much of the panelling, skirting, fireplaces and cornices throughout the house is not original, having been installed during the 1990s refurbishment, it is generally in keeping with the historic style and scale of the house. All historic elements would be retained, with a few, modern elements removed as part of the conversion. The door at the top of the basement stairs would be removed. This door is not historic and its removal would have no impact on the significance of the listed building. The fire surround in the rear ground floor room, which dates from the 1990s, would also be removed to allow for a kitchen to be installed in this room. The original chimney breast and proportions of the room would be retained. This would therefore have no impact on the significance of the listed building.

#### Rear extension

- 7.10 It is proposed to excavate the garden to basement level and construct a rear basement and ground floor extension, in high-quality, modern materials. A number of other houses in the terrace have rear extensions and so the principle of rear extensions is well established, and was accepted by Historic England, Camden and RPCAAC.
- 7.11 The extension would sit within the existing garden walls and therefore only the roof and short rear wall of the proposed ground floor extension would be visible in limited views from surrounding properties. Whilst at basement the extension would occupy the full garden plan, at ground floor it would extend only part way into the garden, retaining a small rear garden. The proposed extension would be light-weight construction with minimal impact on the historic fabric. The existing rear basement and ground floor door openings would be retained and reused.
- 7.12 The rear extension would be of a high-quality design which would preserve the historic fabric and hierarchy of the building. It would have a neutral impact on the significance of the listed building and conservation area.

#### Other Alterations

- 7.13 One of no. 18's vaults would be incorporated into no. 19's curtilage. It is proposed to excavate the vaults to provide increased headroom. The brick pavers in the vaults would be lifted and replaced with stone slabs. The doors would also be replaced to make them secure. Openings would be created between the three vaults. These minor alterations would enable the creation of useable spaces to decant domestic services, including W.C and laundry room, from the main house and preserve the historic plan of the main house.
- 7.14 It is proposed to dismantle and rebuild the cupboards against the Diorama's drum at basement to second floor. The intention is to use these spaces for service risers and the walls would therefore have to meet building regulations. This would result in the loss of a small amount of historic fabric, as some of the cupboard walls incorporate lath and plaster. However, the floor plan would be retained as the cupboards would be reconstructed, and the missing cupboard at third floor would be reinstated to return the original plan of this floor. Overall, it is considered the reconstruction of the cupboards at basement to third floor would result in a neutral impact on the significance of the listed building.
- 7.15 Overall, these proposals would result in an enhancement to the significance of the listed building and conservation area through a reinstatement of the original intended residential use of the building and sensitive refurbishment.





Figure 35 Proposed ground floor plan, showing rear extension. MWA, February 2020.

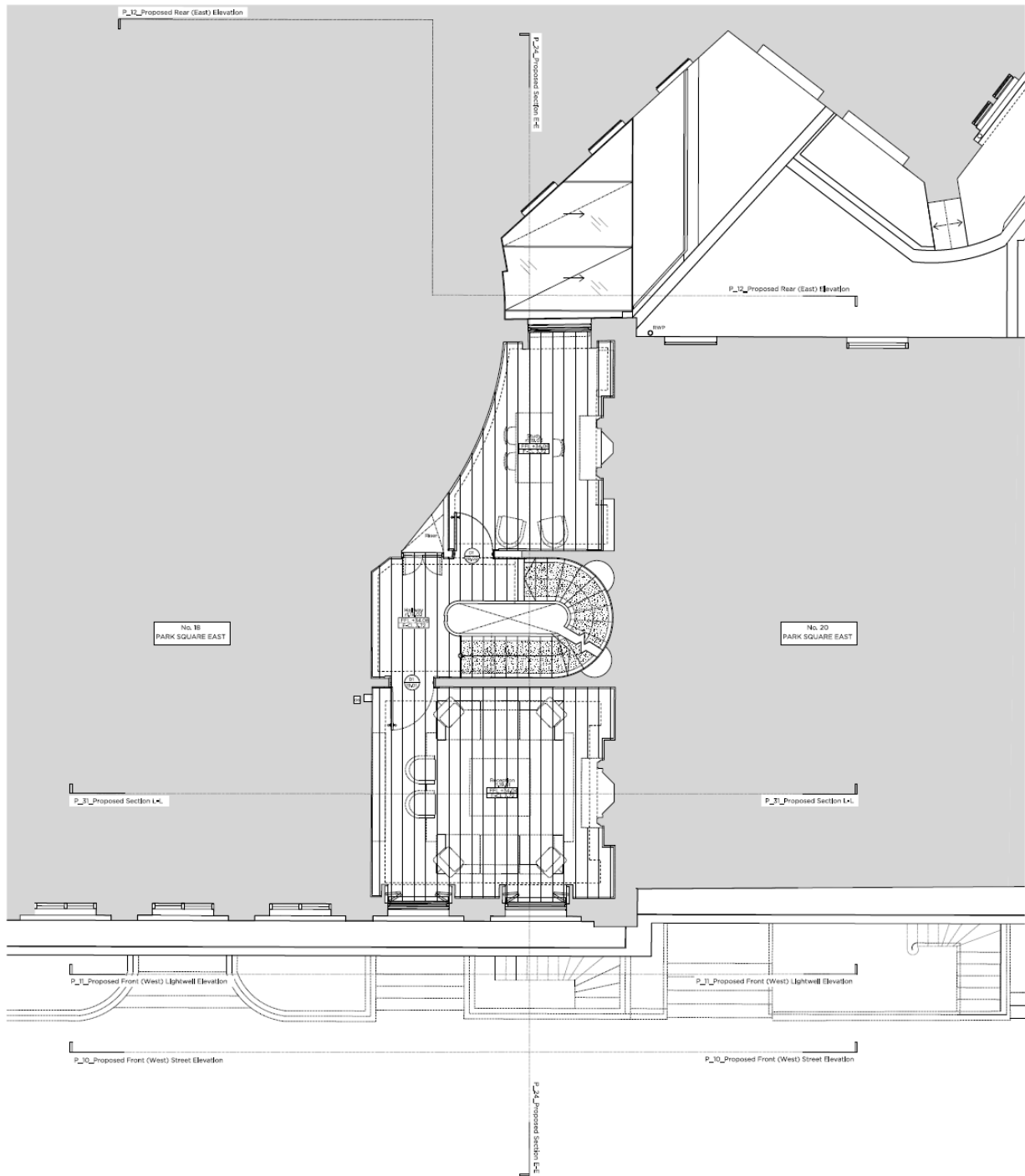


Figure 36 Proposed first floor plan. MWA, February 2020.





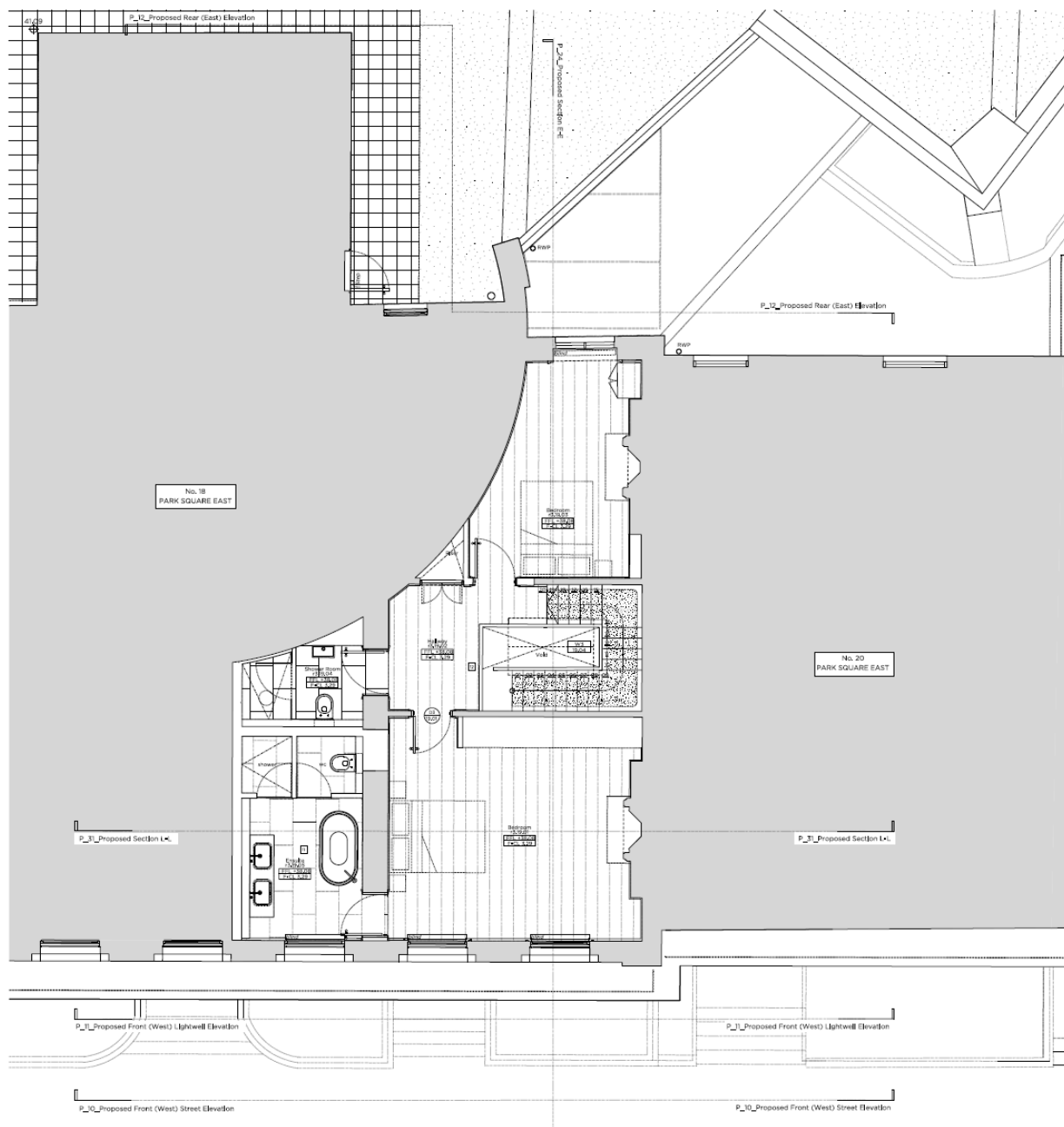


Figure 38 Proposed third floor plan, showing incorporation of part of no. 18. MWA, February 2020.

## 8.0 Conclusion

- 8.1 This Heritage Statement has been produced on behalf of 19 Park Square East Ltd. to determine the impact of the proposed alterations to no. 19 Park Square East on the historic built environment.
- 8.2 The proposals include the conversion of the property from office use to a single dwelling, its original intended use. The proposals preserve the front elevation of the building, which is its most significant feature as part of Nash's early nineteenth century plan for the redevelopment of Regent's Park. The internal alterations have been carefully considered to retain and restore the features of most interest, including the historic floor plan, staircase and chimney breasts. Doorways dating from the 1990s office conversion which provide access to no. 18 would be blocked at basement and ground floor, ensuring the original scale of the house is retained at the principal floors. The 1990s openings at second and third floor would be reconfigured to incorporate part of no. 18 to create the most logical subdivision and layout of the upper floors of both buildings. The small rear extensions at basement and ground floor are in a discreet location and have been carefully designed to preserve the historic fabric and complement the appearance of the historic building.
- 8.3 It is considered that the proposed residential conversion and extension to no. 19 would preserve the architectural and historic interest of 13-24 Park Square East and the character and appearance of the Regent's Park Conservation Area.
- 8.4 As such, the proposals would fulfil the requirements of Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the National Planning Policy Framework 2019 and Camden's policy and guidance relevant to conservation of the historic environment.

# APPENDIX 1

## STATUTORY LIST DESCRIPTIONS

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

Overview

Heritage Category: Listed Building

Grade: I

List Entry Number: 1322054

Date first listed: 14-May-1974

Statutory Address: NUMBERS 13-24 AND ATTACHED RAILINGS, 13-24, PARK SQUARE EAST

Statutory Address: THE DIORAMA, BEDFORD COLLEGE ANNEXE, PETO PLACE

County: Greater London Authority

District: Camden (London Borough)

National Grid Reference: TQ 28769 82273

Details

TQ2882SE PARK SQUARE EAST 798-1/92/1279 (East side) 14/05/74 Nos.13-24 (Consecutive) and attached railings

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.

## APPENDIX 2

# REFERENCES

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AR/599/1 Archives, Royal Holloway, University of London

AR/599/2 Archives, Royal Holloway, University of London

*Bedford College Calendar 1964-6 and 1966-8* Archives, Royal Holloway, University of London

SC/PZ/SP/01, *General Series: Saint Pancras*, London Metropolitan Archives

Pevsner and Cherry, *London 3: North West*, Penguin Books, 1991



