

**Advice from REGENT'S PARK CONSERVATION AREA ADVISORY COMMITTEE
12A Manley Street, London NW1 8LT**

27 March 2020

19 Park Square East London NW1 4LH 2020/0804/P + 2020/0845/L

1. Strong objection.

2. The Advisory Committee considered these applications at our meeting on 2 March 2020. The Committee had had a presentation by the applicants' agents of an earlier version of a scheme for 17-19 Park Square East on 7 October 2019 and reviewed and agreed pre-application advice at our meeting on 4 November 2019. Our pre-application advice was lodged with Camden.

3. The main issue for the Advisory Committee is whether the proposals would cause unacceptable harm to the architectural and historic interest of the Listed Buildings.

4. We are particularly concerned with the integrity and authenticity of the original and surviving plan form of no. 19, and, given the nature of the proposals, of no. 18 Park Square East. We object strongly to the lateral connections retained or proposed between nos 19 and 18 Park Square East, and to the major loss of plan form at second and third floor front rooms at no. 18 Park Square East.

No. 19 Park Square East

5. No. 19 Park Square East is Listed at Grade I and is part of a group, 17-19 Park Square East similarly Grade I Listed, forming the central bay of a symmetrical terrace designed by John Nash and built 1823-25. The Park Square East terrace is part of the grand square, Park Square East and West, linked to Park Crescent, which together constitute the architectural link between Regent's Park and the northern connection to Regent's Street. This formal townscape is itself exceptional. But 17-19 Park Square East are correctly identified as unique in having been designed with a formal elevation to the Square, but an internal plan enabling the inclusion of the Diorama – the only Diorama known to survive in the world. The Diorama was designed by Augustus Charles Pugin. The balance between the formal elevation of the terrace and the demands of the Diorama's plan is one key to the exceptional significance of the group of 17-19 Park Square East, and of each of the three buildings.

6. The plan form of no. 19 Park Square East was determined by the conjunction of the individual house form typical of this terrace, with the adjacent Diorama building, no. 18 Park Square East. For example, it has been observed that the plan form of the staircase has been turned to accommodate the space needed for the auditorium drum of the Diorama. This plan form substantially survives.

7. But it is critical to the original plan form that while no. 19 was modified to accommodate the plan needs of no. 18, both remained separate, self-contained, retaining and expressing their formal integrity in the manner of the other houses in the terrace. It is clear from the plans published in 1823, issued in 1926, recorded in 1948, and 1985 that this was the case. It is confirmed by the Planning Inspector's report – on the basis of which the Secretary of State dismissed the appeals of 1987 (APP/X5210/A/86/054443 and 054442 with APP/X5210/E/86/801761 and 801762). The

Inspector stated at his 10.10 'On the debit side, the **integrity** of Nos 17 and 19 Park Square East as **self-contained individual Georgian houses in virtually unaltered condition** would be lost' (**our emphasis**). We note that the applicant makes no reference in their 'Heritage Statement' dated February 2020, to the Planning Inspector's 1987 report: we advise that his report is a material consideration.

8. We observe that the application for conversion of the group of 17-19 Park Square East to offices granted in 1995 did allow openings to be formed in the party walls between nos 19 and 18 Park Square East. This was to enable the office use to function as a single operation through the three buildings. However this consent was strictly limited. The LB Consent for HB/9570247/R1 was subject to condition 06 'This consent to make openings in the party walls between the Diorama and nos. 17 and 19 Park Square East pertains only to the Prince's Trust's use of this property. On cessation of this use the openings in the party wall shall be closed and these parts of the property shall be reinstated to their former appearance, form and elevation' Condition 06 was issued 'In order to safeguard the special architectural and historic interest of the building.' We note that the applicant refers in their 'Heritage Statement' dated February 2020 at 4.18 and at 7.7 to the lateral openings between nos 17, 18 and 19 as resulting from the 1994 application, but not to the conditions. We advise that the 1995 conditional consent is relevant and a material consideration.

9. We advise that the conditional decision in 1995 correctly assessed the significance of the integrity of no. 19 Park Square East. The permission was granted for a specific user which has now ceased, and for a single use which the current applicant wishes to change. The 1995 consent was expedient, but temporary, and explicitly reversible: its objective of safeguarding the special architectural and historic interest of the building would not be met by making it permanent.

10. We note that the 'Historic Building Report' on 17-19 Park Square East prepared by Donald Insall Associates for the Crown Estate and dated 2014 confirmed, in its significant findings at 1.4, that nos 17 and 19 are in effect intact houses from the early nineteenth century, in spite of the 1995 lateral links, with their original plan form surviving. The Insall report further acknowledges the considerable significance of the surviving original plan form and states that the 1995 openings to no. 18 detract.

11. We advise that the key significance that the adjacent building at 18 influenced the plan form of 19 but maintained the distinct integrity of the self-contained house at 19 would be substantially harmed by these proposals.

12. It is critical that the 1994-95 openings to the stair volume are closed and the party wall restored. The rotation of the orientation of the stair from front-to-back to side-to-side was necessitated by the loss of space to the rear of the house caused by the Diorama auditorium drum. The stair then occupies, and is seen to occupy, the full width of the house. The perception of the original space is determined by the location of doors to front and rear spaces, and not in the party wall to the side. This key aspect of the stair volume is harmfully subverted at both second and third floors by the insertion of openings which demonstrate a quite different spatial arrangement. These openings are misleading as to the special architectural and historic significance of the plan form.

13. Similarly the opening to the front room at both second and third floors again subverts the original plan in which the front rooms span and express the full width of the house. The proposed

lateral openings misleadingly indicate that the house is wider than its frontage elevation demonstrates.

14. The architectural and historic significance of the plan form is exceptional: the proposals would seriously harm this significance.

18 Park Square East

15. We turn to the harm to no. 18 Park Square East by the proposed alterations to the front rooms at second and third floors. We question why these applications do not formally include 18 Park Square East given that they propose substantial changes to that building. There are three issues here. (1) the proposed retention and creation of new openings between no 19 and no 18 in these spaces (2) the proposed subdivision of each of these spaces, and (3) the effective dissociation of these spaces from the rest of no. 18, the Diorama building.

16. The original spaces at second and third floors can, on the one hand, be recognized as following the standard form of front rooms in terraced houses of this type and date. They constitute major spaces in the overall plan, occupying the whole width of the house frontage. But no. 18 Park Square East is not a house. The spaces front the auditorium drum of the Diorama itself. They indicate the maintenance of the standard terrace house plan in a non-domestic situation. They inform us of the scale and plan of the first floor vestibule (1823 printed plan and patent drawing section) from which the members of the audience entered the auditorium salon itself. Apparently removed at the first floor by the work for the 1855 Baptist Chapel, the second and third floor spaces are the only survivors of this part of the original plan at the upper floors.

17. It is clear that both second and third floor spaces have been modified over time. The 1948 rheumatism clinic plans show some subdivision by partitions, undertaken before Listing. In 1994-95 corridors were permitted to the rear, following in part the curve of the drum which they conceal. But while these corridors detract from the original spaces, they do not obscure the key element in both spaces, which is that they express the full width of the frontage of the Diorama building. We observe that the Insall report of 2014 recognized the space at third floor (which it identified as 18 T1) as a room from the original no. 18 Park Square East building.

18. The application proposals would destroy these exceptional spaces and their special architectural and historic significance.

19. The retention and creation of new lateral openings to both nos 17 and 19 Park Square East would harm the self-contained character of the Diorama building at second and third floor levels.

20. The subdivision of both spaces by what would be a party structure, and further subdivision into a series of smaller spaces, would harm to destruction the significance of these original and surviving spaces. The junctions and services would harm the wide sweep of the Diorama drum enclosure in these spaces.

21. The two spaces would also cease to function as part of the Diorama building, substantially subverting the original and surviving plan form, and seriously harming the special architectural and historic significance of this unique Grade I Listed Building.

Historic fabric

22. More generally, we advise that we are concerned by the applicant's approach to historic fabric.

23. We note their statement (Bidwell's Heritage Statement at 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.' This does not adequately assess original fabric in the house. We note that a series of details, for example, door cases, are identified as original in Insall's Report of 2014 (at 19 S1, S3, S4) do not appear to be included in Bidwell's report. Ambiguity of this kind does not ensure the protection of significant historic fabric.

Conclusions

24. The Advisory Committee has identified a series of proposals which would seriously harm the exceptional architectural and historic character of both 18 and 19 Park Square East, both Listed Grade I. We note that in 2019 we were consulted pre-application on an alternative scheme which suggests that the current proposals are not the only way to keep the Listed Buildings in beneficial use.

25. We note that the current application proposals do not present public benefit that would outweigh the harm to the exceptional heritage assets.

26. We are happy to discuss any aspect of this advice with officers.



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Chair RPCAAC