



31 Cumberland Terrace, London, NW1 4HP:

**Heritage Statement:
Heritage Significance, Impact Assessment and Justification Statement**

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February 2021

33 Cumberland Terrace, London – Heritage Statement

Issued February 2021

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1.0. INTRODUCTION

- 1.1. The subject site is 33 Cumberland Terrace, London, NW1 4HP. The site comprises a second-floor flat within the central block of the terrace, which is Grade I statutorily listed as Nos. 1-59; the full list description can be found in **Appendix 1**. The site is located within the Regent's Park Conservation Area, London Borough of Camden, and adjacent to the Grade I Registered Regent's Park. This part of Cumberland Terrace suffered minimal bomb damage during the Second World War, but was rebuilt behind the retained and restored façade during the early 1960s.
- 1.2. This Heritage Statement has been produced to inform pre-application discussions and to accompany an application for Listed Building Consent for a number of minor internal alterations.
- 1.3. This Heritage Statement complies with the requirements of the National Planning Policy Framework, February 2019 (NPPF) and the online Planning Practice Guidance (PPG) in respect of Heritage issues. No archaeological assessment has been undertaken as part of this report.
- 1.4. This Heritage Statement has been written in accordance with Historic England Advice Note 12: "Statements of Heritage Significance" (October 2019), and has adopted the following structure:
 - An appraisal of the local heritage context.
 - An appraisal of the significance of the site.
 - An assessment of the potential or actual impact of the proposed works upon the significance of the site and on the character and appearance of the Conservation Area.
 - How the proposed works comply with relevant policies in the NPPF and the PPG, and how the works are in accordance with local and regional policies.
- 1.5. **Summary**
 - The subject site at 33 Cumberland Terrace is located within the central block of a Grade I statutorily listed terrace located within the Regent's Park Conservation Area, London Borough of Camden. The flat spans three original houses within the terrace (Nos. 14, 15 and 16) as a result of lateral conversion and reconstruction during the early 1960s.
 - The high architectural and historic interest of 33 Cumberland Terrace is derived almost exclusively from the principal front elevation and its contribution to John Nash's palatial design on the east side of Regent's Park. The plainer rear elevation and the interior of the building, which was reconstructed to provide laterally arranged flats during the early 1960s, are considered to be of low architectural and historic interest. The existing internal fabric and layout of No. 33 are considered to make at best a neutral contribution to the architectural and historic interest of the building.
 - An assessment of the impact of the proposals concludes there would be a **minimal to negligible and neutral** impact on the significance of the Grade I listed building at 33 Cumberland Terrace. The proposals will cause **no harm** to any historic fabric or plan form, affecting only fabric dating from the 1960s reconstruction works. Indeed, the proposals are considered to enable a better appreciation and understanding of the historic proportions and plan form of the principal front second-floor room within the original house at No. 15, whilst the reinstatement of an appropriate chimneypiece within the reception room would enhance a better appreciation of the character of that former principal bedroom to the original townhouse at No. 14. Any fragmentary legibility of the lateral separation between the three

townhouses will be sustained. The proposals are considered to have a **negligible** impact on the character and appearance of the Regent's Park Conservation Area. There will be **no impact** on the setting of the Grade I Registered Regent's Park as the proposed works are internal.

1.6. Authorship

- **Dorian A T A Crone** BA BArch DipTP RIBA MRTPI IHBC - Heritage and Design Consultant. Dorian has been a Chartered Architect and Chartered Town Planner for over 30 years. He has also been a member of the Institute of Historic Building Conservation for 25 years. Dorian is a committee member of The Society for the Protection of Ancient Buildings, the International Committee on Monuments and Sites (ICOMOS), ICOMOS UK and Institute of Historic Building Conservation. He has been a court member with the Worshipful Company of Chartered Architects and a trustee of the Hampstead Garden Suburb. He is Chairman of the City Heritage Society and is a member of the City Conservation Area Advisory Committee. Dorian is also chairman and a trustee of the Drake and Dance Trusts, and a Scholar of the Society for the Protection of Ancient Buildings.

Dorian has worked for over 30 years as Historic Buildings and Areas Inspector with English Heritage, responsible for providing advice to all the London Boroughs and both the City Councils. Dorian has also worked as a consultant and expert witness for over 20 years advising a wide variety of clients on heritage and design matters involving development work, alterations, extensions and new build projects associated with listed buildings and conservation areas in design and heritage sensitive locations. He is a panel member of the John Betjeman Design Award and the City of London Heritage Award, and is a Design Review Panel member of the South West Region, the London Boroughs of Richmond upon Thames, Lewisham, Islington and Wandsworth, and the Design Council. Dorian has also been involved with the Royal Academy Summer Exhibition Architectural Awards and the Philip Webb Award along with a number other public sector and commercial design awards.

Dr Daniel Cummins MA (Oxon) MSc PhD IHBC – Historic Environment Consultant. Daniel is an historian with a BA and Master's in History from Oxford University and a doctorate from the University of Reading. Daniel has a Master's degree in the Conservation of the Historic Environment and is a member of the Institute of Historic Building Conservation. He provides independent professional heritage advice and guidance to leading architectural practices and planning consultancies, as well as for private clients. He has an excellent working knowledge of the legislative and policy framework relating to the historic environment. Daniel has extensive experience in projects involving interventions to listed buildings and buildings in conservation areas, providing detailed assessments of significance and impact assessments required for Listed Building Consent and Planning Permission.

1.7. Methodology

This assessment has been carried out gathering desk-based and fieldwork data. The documentary research was based upon primary and secondary sources of local history and architecture, including maps, drawings and Volume 19 of the *Survey of London (The Parish of St Pancras Part 2)*. No access to archival material at Camden Local Studies and Archives, the National Archives and the Crown Estate was possible as a result of Covid-19 restrictions. A site visit was conducted on 3rd February 2021, when a review of the subject site was conducted by visual inspection to analyse the building and identify the elements which contribute to its significance in order to establish how that significance might be affected by the proposed works.

2.0. LOCATION AND CONTEXT

- 2.1. 33 Cumberland Terrace is located within the central block of the terrace on the east side of Regent's Park (a Grade I Registered Park and Garden) on the east side of the Outer Circle. The subject site is located within the Regent's Park Conservation Area, London Borough of Camden (Figure 1).

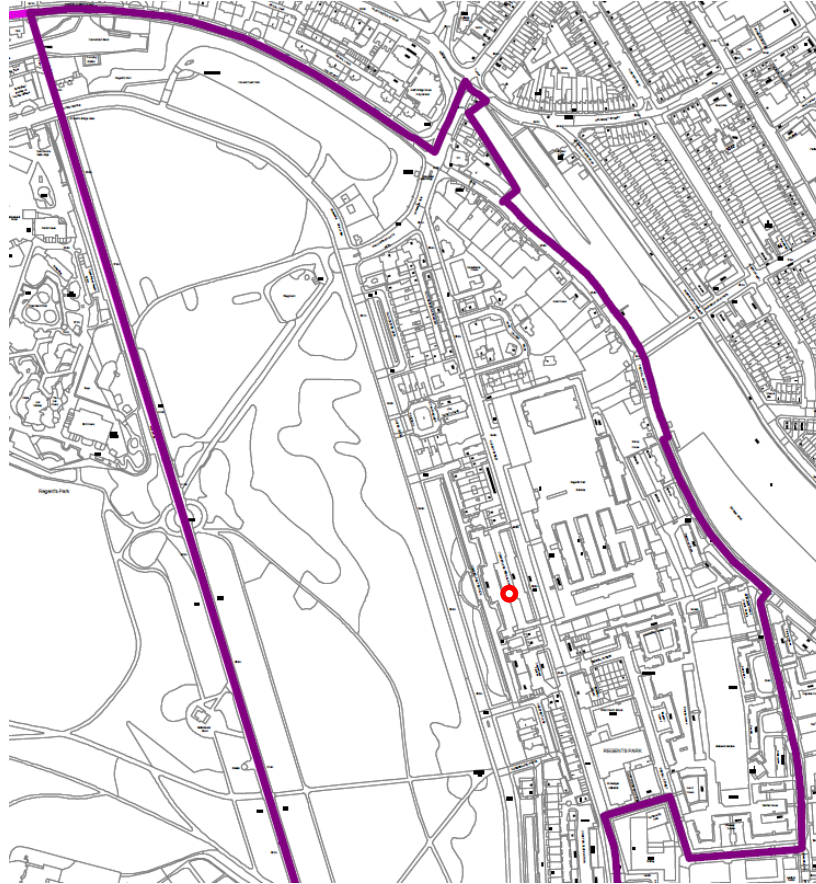


Figure 1: The location of the subject site outlined in red within the Regent's Park Conservation Area.

- 2.2. The Regent's Park Conservation Area (Camden) comprises the eastern segment of John Nash's comprehensive masterplan of park, terraces and villas. The front elevations of the houses of Cumberland Terrace are set back from the open space of the Grade I Registered Park beyond the Outer Circle and a narrow strip of planted gardens, but possess an important historic and aesthetic synergy with the Park; from the eastern edge of the Park, the stuccoed terrace appears above the treeline to create a grand linear composition enclosing the open space (Figure 2). This is identified as a key view within the Regent's Park Conservation Area Appraisal. The Park and the terraces were designed to be an integrated composition of architecture and landscape, and so the wider setting of the subject site should be understood within the context of the whole composition, with stuccoed terraces extending around the Outer Circle of the Registered Park. Given the internal nature of the proposals, it has been considered there will be no impact on the significance of the Grade I Registered Park and its setting.
- 2.3. The more immediate setting of the front elevation of the subject site is limited to the immediate streetscape of Cumberland Terrace and the Outer Circle from where the composition of the terrace as a whole cannot be best appreciated; however the uniformity and regularity of detailing plays a crucial part from such closer quarters in illustrating the rhythm of the overall grand façade (Figures 2 and 3). The

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view from the Outer Circle is also a key view within the Conservation Area which is identified within the Conservation Area Appraisal (Figure 3). The front elevations of the terraces, including the subject site within Cumberland Terrace, therefore contribute positively to an extravagant scenic character and appearance within this part of the Conservation Area and within the setting of the Registered Park.

- 2.4. The setting of the rear (east) elevation which fronts Cumberland Terrace Mews is considered to be substantially less sensitive and much more enclosed. Whilst still within the Regent's Park Conservation Area, the buildings within the mews were all reconstructed during the early 1960s and the rear elevations of the terrace were substantially altered, displaying none of the architectural and historic interest of the front elevation (Figure 4).



Figure 2: Cumberland Terrace from the eastern edge of the Grade I Registered Regent's Park.



Figure 3: The subject site forms part of the grand architectural composition of the Grade I listed Cumberland Terrace from the Outer Circle.



Figure 4: The substantially altered rear elevations of Cumberland Terrace are largely enclosed within Cumberland Terrace Mews.

3.0. HISTORICAL DEVELOPMENT

- 3.1. Named after George III's younger brother, the Duke of Cumberland, Cumberland Terrace was completed in 1826 by builder William Mountford Nurse. The palace-fronted terrace with its projecting central portico topped by a pediment supported on giant fluted Ionic columns was designed by architect John Nash and is considered to be the culmination of his scheme around Regent's Park (Figure 5). The central block of the terrace comprised fifteen houses, the central five of which projected forward from the building line of the terrace to form a striking architectural feature. The subject site spans the second floor of three of these central five houses, originally numbered 14, 15 and 16 Cumberland Terrace. To an extent, Nash's architecture represented grandeur on the cheap. The spectacular frontages with their columns, statues and pediments were merely stucco. The structure behind was London stock brickwork and thin deal timber like any other London terrace. The plan form was no different from any other London townhouse of the period. In addition, the foundations were shallow, set on London clay and there were no damp courses at that time.
- 3.2. The detailed footprint can be seen in the Ordnance Survey of 1870 (Figure 6); the townhouses were typical in footprint, comprising the principal building with rear closet wing, and a rear attached service wing (probably limited to lower ground and ground floor) creating an enclosed lightwell. Mews buildings were located to the rear; the mews houses fronted Cumberland Terrace Mews and were designed as stables and coach houses to the ground floor with accommodation to the first floor. The principal rooms of the main house were located on the first floor in a typical arrangement. The second floor would have comprised two principal bedrooms on the north side of each house; a smaller dressing room or later

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bathroom was located on the south side to the front, whilst the staircases were located on the south side towards the centre/rear of each house (Figures 7a and 7b). The 1938 *Survey of London* volume suggested that much of the internal architectural detailing was standardised in each house, including the fireplaces, cornice details and the staircases.

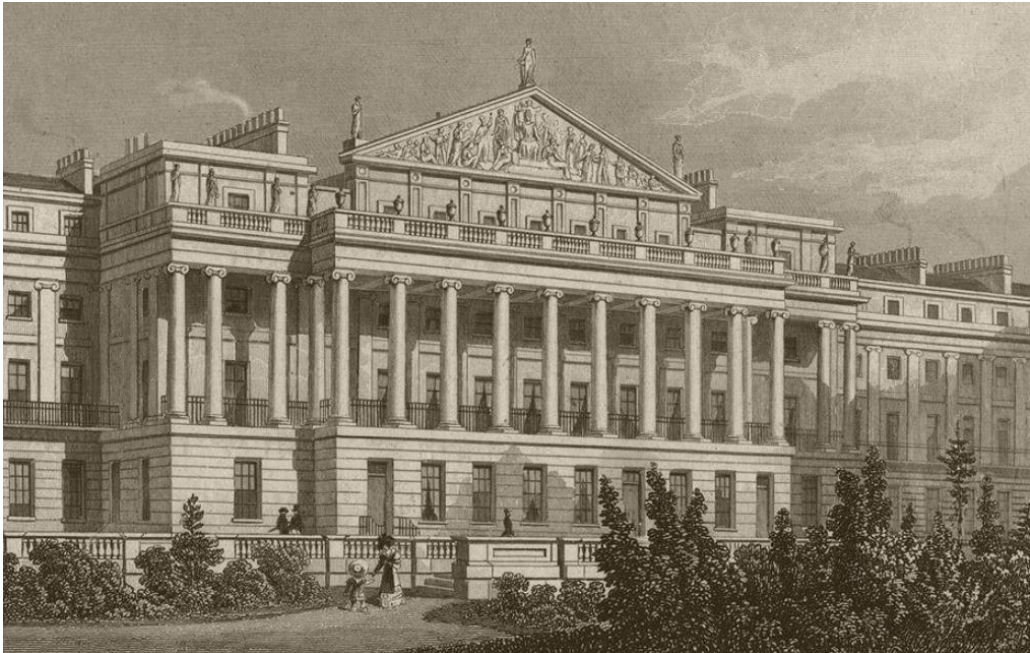


Figure 5: View of the central block of Cumberland Terrace shortly after completion, 1828.



Figure 6: Ordnance Survey (1870).

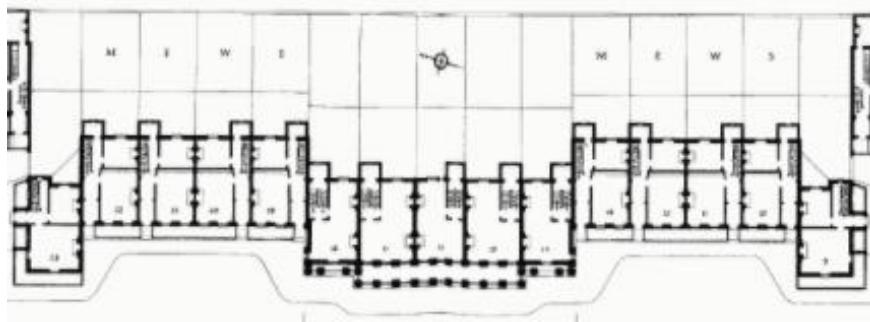


Figure 7a: Ground Plan (first floor of the centre five houses) of Cumberland Terrace (1938), *Survey of London*.

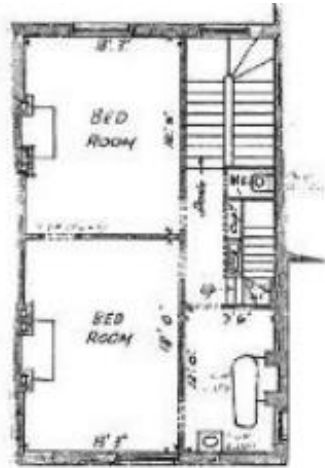


Figure 7b: Plan of the Second Floor of 15 Cumberland Terrace in 1919 (Camden Archives).

- 3.3. By the end of the Second World War, many of the houses within the terrace had been abandoned and were in poor condition with extensive dry rot. The houses at 14, 15 and 16 Cumberland Terrace suffered only minor blast damage due to bombing, although the mews buildings to the rear of the three houses were more seriously damaged. In 1947, it was reported that the five blocks of Cumberland Terrace were in the process of being converted ready for occupation by the Ministry of Transport (*Marylebone Mercury*, 04 Jan 1947) during which time the building was kept in adequate repair. A newspaper image from 1947 illustrated the poor condition of the central block of the terrace at that time (Figure 8).
- 3.4. The Gorrell report, published in 1947, recommended that Cumberland Terrace should be retained and restored given its national importance, but nothing took place for 10 years. Civil servants were moving out by 1954 and it was not until the late 1950s that the newly reconstituted Crown Estate Commissioners issued *The Future of the Regent's Park Terraces*, in which they laid out a seven-year plan to work with private developers in the restoration and redevelopment of the terraces. The developers were Hallmark Securities Ltd and the architects were the Louis de Soissons Partnership, with advice provided by architectural historian Sir John Summerson. Regarding Cumberland Terrace, the Commissioners concluded that

“the only important original features on Cumberland Terrace visible from the Park are some restored statues and the stuccoed sculptural group (heavily repaired) in the tympanum of the pediment. Practically the only unseen original work left in this terrace is the brickwork and stucco remaining after ruthlessly eradicating dry rot. Broadly this is the picture which must be assumed for future restorations of a main terrace.”

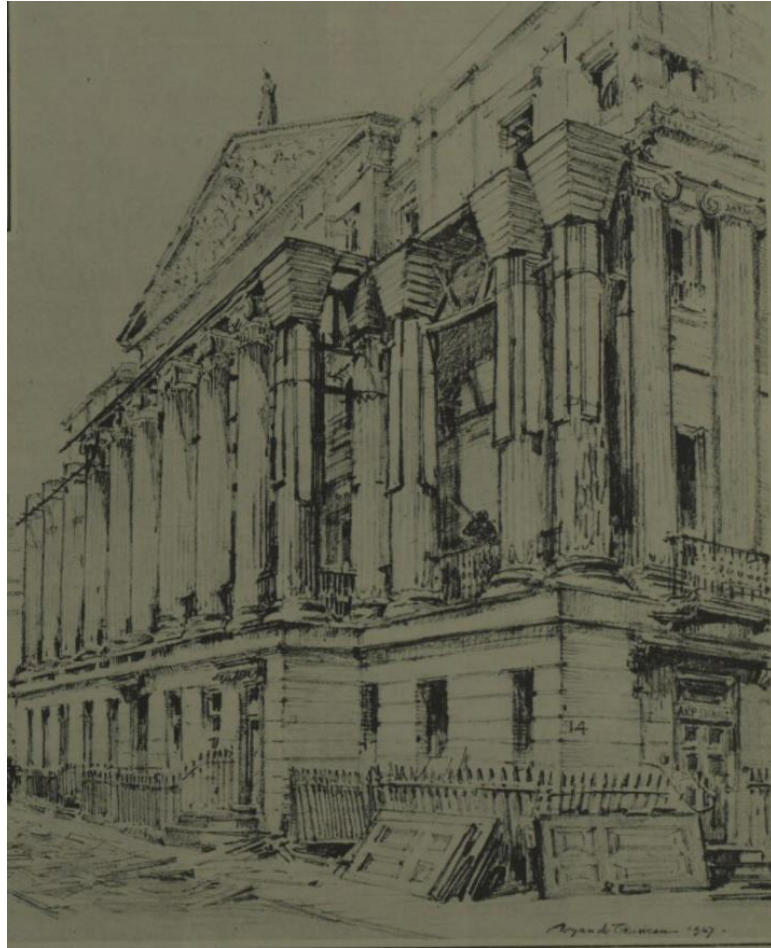


Figure 8: Cumberland Terrace in 1947 as shown in the *Illustrated London News* (24 May 1947).

- 3.5. The terrace was extensively rebuilt behind the main façade within the footprint of the principal house (the original closet wings, rear service ranges and mews buildings having been cleared). A new concrete superstructure was constructed across the terrace (concrete floor slabs supported on concrete pillars). Any structural timbers within the walls were replaced with concrete, involving the removal of all internal plaster. The front elevation was restored to its original design, with incongruous additional storeys removed. Cumberland Terrace included both houses and flats, with little respect shown for historic plan form as many flats were formed laterally breaking through the original party walls between the houses. All internal partitions were newly constructed for each flat.
- 3.6. This was the case with the formation of No. 33 (labelled 29 on the conversion plan), which spanned the second floors of Nos. 14, 15 and 16 (Figure 9). The entrance was formed through the party wall between 14 and 15, with the main living room located within the front room of No. 14. A central corridor was formed leading through the original party between 15 and 16 to the master suite, which was located within the former rear room and infilled stairwell of 16; a central new lateral party wall separated the neighbouring flat to the front part of 16. The whole of the second floor of 15 formed part of the flat, with the former front room subdivided to create a dining room and maid's room (current study), a bathroom and storage cupboards to the centre, and a galley kitchen and second bedroom to the former rear room and infilled stairwell (Figure 9).

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- 3.7. The conversion plan seems to suggest that where they were not broken through to create openings, original party walls were left intact. However this has been found not to be the case. Recent investigations at first floor level within the flat that also spans the original houses at 14, 15 and 16 for proposed new openings in the party wall have demonstrated that the party walls are of concrete construction and so also date from the early 1960s (ref. 2019/5454/P).

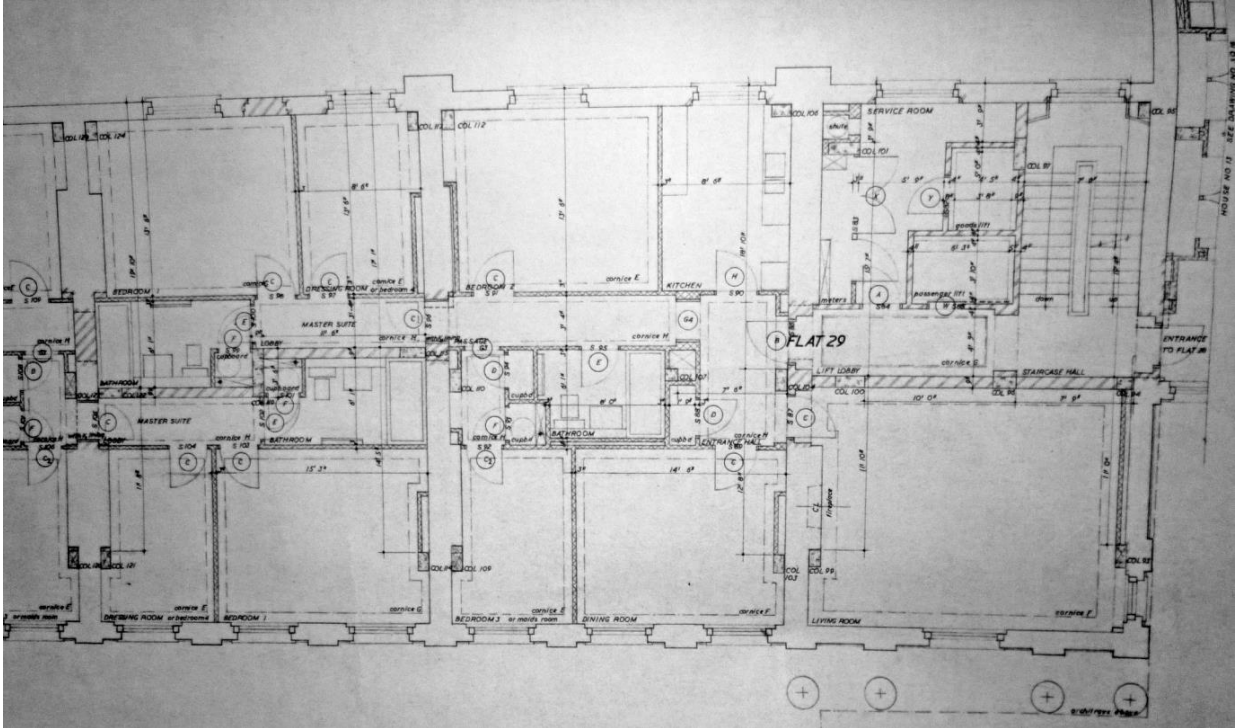


Figure 9: Conversion Plan of Second Floor of Nos. 14-16 Cumberland Terrace.

- 3.8. The early 1960s arrangement at No. 33 remained unchanged until 2005, when the master suite was opened up to create a substantial new principal bedroom. The doorway was relocated into Bedroom 2 at this time, and new cornice mouldings were provided in the living room, dining room and master bedroom (Figure 10). In 2014, consent was obtained to make further alterations to the layout of No. 33. This included removing most of the partition between the dining room and the study, relocating the kitchen from the rear to the study at the front, and forming a utility room between the new kitchen and the central corridor (Figure 11). Although it does not appear that the scheme was implemented, the Officer's Report which accompanied the granting of Listed Building Consent confirmed that

“Much of the rear of this terrace was rebuilt in the 1960s so little original fabric remains and the plan form has been altered. All the interiors of Cumberland Terrace were fundamentally demolished and rebuilt in the 1950’s and 60’s and subsequently there has been further updating” (ref. 2014/6916/L).

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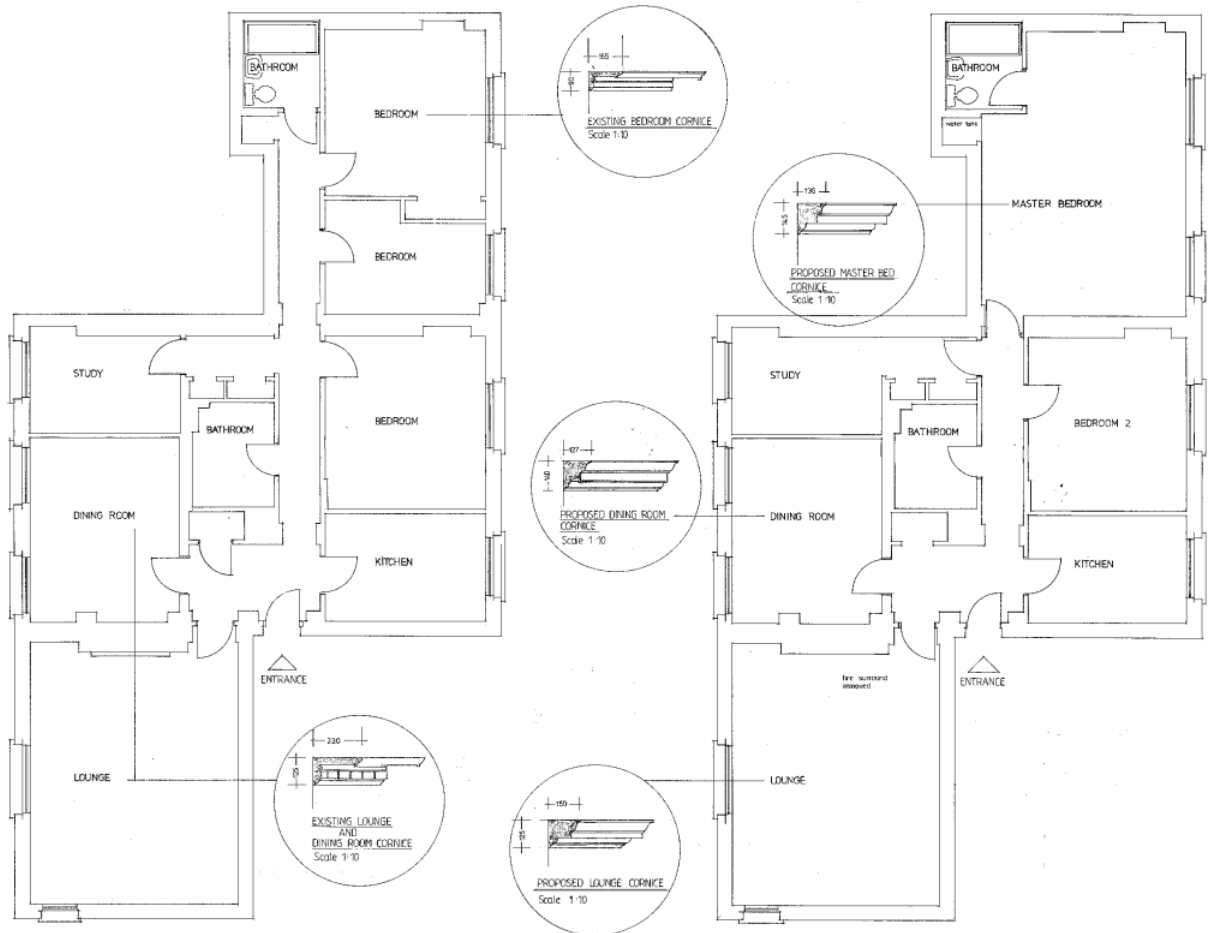


Figure 10: Existing and Proposed Plans of No. 33 in 2005.

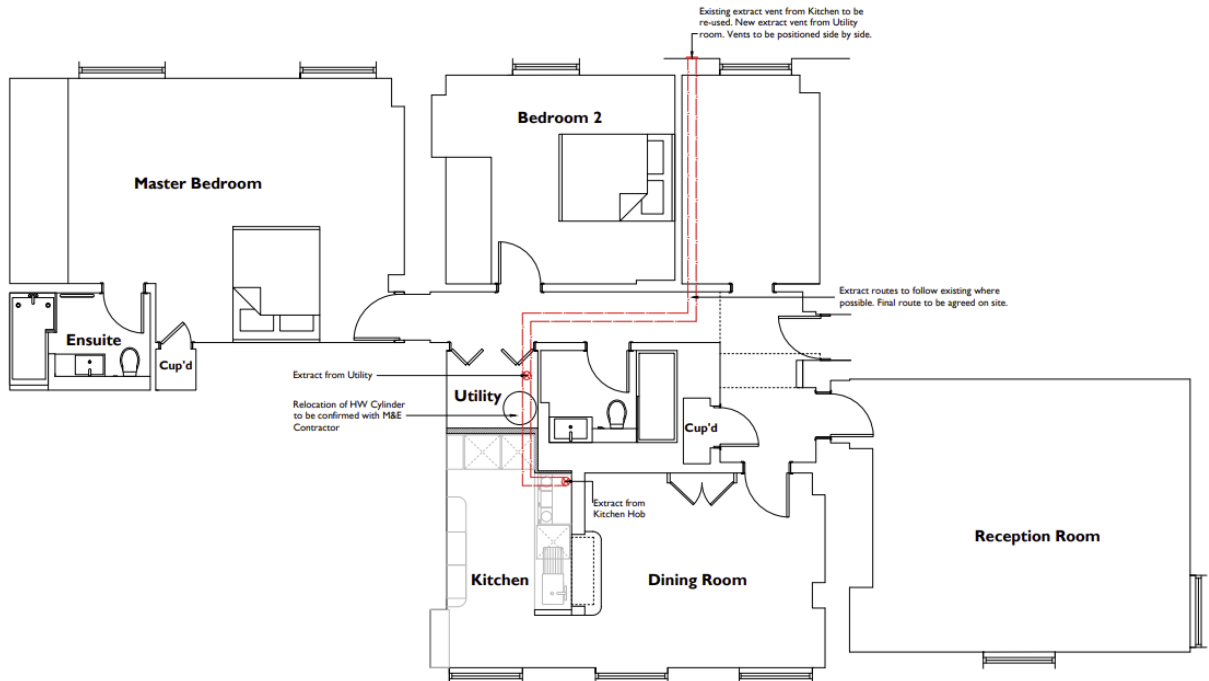


Figure 11: Consented proposals at No. 33 in 2014.

4.0. DESCRIPTION OF THE SUBJECT SITE

- 4.1. The front (west) elevation which was retained and restored during the 1960s redevelopment reflects the rhythm and uniformity that contributes to the palatial composition of the terrace as a whole. The subject site at No. 33 comprises the four southernmost windows at second-floor level within the central block of the terrace, spanning the frontages of two of the original townhouses (Figure 12). The windows are located beneath the portico and there is limited visibility from the public realm; the windows appear to be 20th century replacements, although they reflect an appropriate early 19th century glazing pattern. A window is located on side (south) elevation, which lit the former bathroom in 14; the opening is likely to be original given this was probably always a separate room with its own fireplace, although the window is likely a 20th century replacement (Figure 13).



Figure 12: The front (west) elevation of the central block of Cumberland Terrace – the four southern windows (right) of the second floor comprise the subject site.



Figure 13: The side (south) elevation of the central block – the site comprises the window at second-floor level.

- 4.2. The rear elevation comprises part of the original rear wall of the main house in exposed London stock brickwork at second floor level (Figure 14). The lower ground floor and ground floor levels were rebuilt during the 1960s allowing for the demolition of the rear service wings and mews houses; these levels are now rendered. The four windows which comprise the subject site date from the 20th century.



Figure 14: The rear elevation of the subject site at second-floor level; the scarring of substantial previous alterations is evident across the elevation.

- 4.3. The interior of No. 33 Cumberland Terrace possesses little or no architectural and historic interest. All internal architectural detailing and joinery (doors, cornicing and skirting) in all rooms is modern, dating from the early 1960s and later alterations (Figures 15 to 19). The lateral layout of the flat and proportionality of the rooms also date from the early 1960s and have little if any relationship with the original second floor layouts of the three townhouses; the front room of 14 was opened up to create the existing living room (Figure 15), whilst the front room of 15 was subdivided to create the existing separate study and dining room (Figures 16 and 17). The original lateral separation between the three original houses is very difficult to understand between the corridor and the master bedroom, particularly as there is no evidence of a chimneybreast or fireplace within the study (Figure 17); it is more obvious in the living room owing to the arched treatment of the 1960s doorway and the prominent chimneybreast (Figure 15). There is no appropriate chimneypiece on this surviving chimneybreast in the reception room.



Figure 15: The living room (reception room) within the front room of the original No. 14 was originally two rooms, showing modern architectural detailing and joinery and 1960s opening in the party wall adjacent to the chimneybreast.



Figure 16: The dining room within the front room of the original No. 15, showing modern architectural detailing and subdivision introduced during the early 1960s.



Figure 17: The existing study was created during the 1960s subdivision of the original No. 15; there is no visible evidence for the chimneybreast which would have been located within the party wall (right).



Figure 18: The master bedroom and ensuite within the rear of the original No. 16 - created during the early 1960s and altered in 2005.



Figure 19: The existing early 1960s galley kitchen within the infilled stairwell area at the rear of No. 15.

5.0. ASSESSMENT OF SIGNIFICANCE

- 5.1. Significance is defined by Historic England as “The sum of the cultural and natural heritage values of a place, often set out in a statement of significance”.
- 5.2. The aim of a Significance Assessment is, in the terms required by Paragraphs 189-190 of the NPPF, a “*description of the significance of a heritage asset*”. In the context of a historic building which has been the subject of a series of alterations throughout its lifetime, it is also a useful tool for determining which of its constituent parts holds a particular value and to what extent. *Good Practice Advice in Planning Note 2* (March 2015) states that understanding the nature of significance is important for understanding the need for and best means of conservation. Understanding the extent of that significance leads to a better understanding of how adaptable a heritage asset may be. Understanding the level of significance provides the essential guide as to how policies should be applied.
- 5.3. The descriptive appraisal will evaluate the site against listed selection criteria of ‘Principles of Selection for Listing Buildings’, DCMS, 2018. Historic England’s ‘Advice Note 12: Statements of Heritage Significance’ (October 2019)’, which partially overlap with the Statutory Criteria, have also been considered. Historic England identifies three potential points of interest that can be held by heritage assets; artistic and architectural, historical and archaeological:

- **Archaeological Interest:** There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- **Architectural and Artistic Interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.
- **Historic Interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

5.4. Although not officially considered to be one of the four principal values, **setting** is recognised as an important value that makes an important contribution to the significance of a heritage asset. This assessment of the contribution to significance made by setting should provide the baseline along with the established values used for assessing the effects of any proposed works on significance.

The level of significance for each value and the setting will be assessed using the following grading:

- **High** – values of *exceptional or considerable* interest;
- **Medium** – values of *some* interest;
- **Low** – values of *limited* interest.

5.5. Archaeological Interest

Cumberland Terrace is not located within an Archaeological Priority Area and was built on previously undeveloped land during the early 19th century. It is likely that the construction of the terrace, which would have involved the substantial manipulation of the ground levels, truncated evidence of earlier activities within the area. **Archaeological is therefore considered to be low.**

5.6. Architectural and Artistic Interest

The architectural and artistic interest of Cumberland Terrace is derived from the palatial design of the front west elevation; John Summerson described it as “the crowning glory” of Nash’s Regent’s Park design – “a marvellous, adorable extravagance” (*Georgian London*, p.184). Whilst the front elevation remains largely as originally conceived and possesses distinctive group value with other Grade I Nash terraces around the Park in terms of design, detailing, scale and materials, it was much-repaired and restored during the early 1960s having suffered considerable damage during the Second World War and neglect during the Post-War period. The front and side elevations of Flat 33, comprising five windows, contribute positively to the architectural composition of the terrace as a whole, but the front elevation is somewhat discreet at second-floor level beneath the central portico. The rear elevation has been subject to greater alteration and presents a much plainer composition, with the scarring of the demolished rear service ranges and closet wings. All original internal plan form, joinery and architectural detailing were lost during the 1960s redevelopment, when the entire internal structure (including the party walls as the

evidence suggests) was reconstructed. Any surviving original fabric is therefore likely limited to the brickwork of the external walls. **Whilst the front and side elevations are considered to possess high architectural and artistic interest, the rear elevation and the interior of the subject site are considered to possess low architectural and artistic interest.**

5.7. Historic Interest

The historic interest of the subject site lies in its association with the wider planned landscape of Regent's Park as part of John Nash's original ambitious design. The architectural composition of Cumberland Terrace as a whole and its relationship with the landscape is of national significance; this is conveyed through the retained and restored front elevation and the contribution of the subject site to the appearance of the terrace as a whole rather than from any internal historic fabric or plan form. The palatial architecture of the front elevation is an important component of one of the most significant developments of Georgian London at Regent's Park and contributes positively to a strong sense of place and cultural association. Conversely, Flat 33 was created during the works of the early 1960s and comprises the second floor across three original townhouses; any appreciation and understanding of the historic plan form and the lateral separation between the three houses is now fragmentary at best given the interior of the building was entirely reconstructed, leaving only the front and rear elevations comprising historic fabric (albeit heavily restored). **Whilst the front and side elevations are considered to possess high historic interest, the rear elevation and the interior of the subject site are considered to possess low historic interest.**

5.8. Contribution of Setting to Significance

The most significant element of the setting of the subject site is that of the principal front west elevation which includes the Grade I Registered Regent's Park landscape in conjunction with the other houses which make up the grand architectural composition of Cumberland Terrace and the adjoining terraces. The front elevation is filtered by trees, affording only glimpses from the Outer Circle and Park during the summer months, but the terrace and its roofscape form an important visual enclosure to the east side of the Park. The rear elevation is enclosed by buildings dating from the 1960s; it is not readily experienced from the public realm. The site as a whole is located within the Regent's Park Conservation Area. **The primary aspect of the setting to the west across the Park is therefore considered to be of high value and contributes positively in appreciating and understanding the significance of the listed building. The secondary aspect to the rear makes a more neutral contribution in enabling an appreciation and understanding of the significance of the building.**

5.9. Summary of Significance

The high architectural and historic interest of 33 Cumberland Terrace is derived almost entirely from the principal front elevation and its contribution to John Nash's palatial design on the east side of Regent's Park. The plainer rear elevation and the interior of the building, which was reconstructed to provide laterally arranged flats during the early 1960s, are considered to be of low architectural and historic interest. The existing internal fabric and layout of No. 33 are considered to make at best a neutral contribution to the architectural and historic interest of the building.

6.0. IMPACT ASSESSMENT

6.1. A scheme detailing proposals at the subject site has been prepared by TLA Architects in February 2021. The proposals involve a number of minor internal alterations:

- The relocation of the kitchen to the front of the flat incorporating the existing bathroom and study.
- The provision of new bathrooms within the existing kitchen area and new cupboards off the corridor.
- The provision of a new opening between the reception room and the dining room with the introduction of jib doors.
- The provision of a wider double door from the hallway into the dining room.
- The widening of door opening into Bedroom 2 to give more light in the corridor, and the creation of a new jib door opening into the ensuite bathroom.
- The remodelling and extension of the existing ensuite bathroom within the master bedroom.
- The reinstatement of a Regency-style bullseye marble chimney piece to the existing surviving chimneybreast in the reception room.
- The replacement and upgrade of the outdated finishes and services including rewiring the electrics, comfort cooling, ventilation, repairs, and maintenance.

6.2. The proposals may have an impact on the significance of the Grade I listed subject site and on the character and appearance of the Regent's Park Conservation Area.

6.3. For the purposes of assessing the likely impact to result from the proposals and the subsequent impact on the settings of the identified heritage assets, established criteria have been employed. If the proposed development will enhance heritage values or the ability to appreciate them, then the impact on heritage significance within the view will be deemed **positive**; however, if they fail to sustain heritage values or impair their appreciation then the impact will be deemed **negative**. If the proposals preserve the heritage values then the impact will be deemed **neutral**.

6.4. Within the three categories there are four different levels that can be given to identify the intensity of impact:

- **"negligible"** – impacts considered to cause no material change.
- **"minimal"** - impacts considered to make a small difference to one's ability to understand and appreciate the heritage value of an asset. A minor impact may also be defined as involving receptors of low sensitivity exposed to intrusion, obstruction or change of low to medium magnitudes for short periods of time.
- **"moderate"** - impacts considered to make an appreciable difference to the ability to understand or appreciate the heritage value of an asset.
- **"substantial"** - impacts considered to cause a fundamental change in the appreciation of the resource.

6.5. The proposed relocation of the kitchen to the front part of No. 33 (originally the front principal bedroom of the townhouse at 15 Cumberland Terrace) was established in principle by the scheme consented in 2014 (ref. 2014/6916/L). It is now proposed to open up the space currently comprising the dining room,

study and bathroom to create an open dining room and kitchen. The existing layout and subdivisions date from the early 1960s reconstruction works and do not comprise any historic fabric; the existing layout has no relationship with the historic second-floor plan form of the townhouse. Indeed, it is considered that by opening up the space, a better appreciation and understanding of the historic proportions and plan form of the space will be possible, particularly since this would have been the location of the principal bedroom of the townhouse. All kitchen cabinetry and paraphernalia would be located to the rear of the room away from the front windows, thereby making it imperceptible from the public and private realms within the Regent's Park Conservation Area, and not at all visible from the Grade I Registered Park; this is an important consideration given the historic uses of the second floor and its contribution to the principal façade of the listed building. **The proposal is therefore considered to have a minimal and neutral impact on the significance of the listed building and a negligible impact on the character and appearance of the Conservation Area.**

- 6.6. Given the above proposal, it is proposed to relocate the bathroom and to provide an ensuite bathroom to Bedroom 2 within the existing galley kitchen area. This space is considered to be of little if any significance as it is located within the infilled stairwell of the original townhouse at 15 Cumberland Terrace. It is very much a secondary part of the building located to the rear, which has been assessed as having minimal architectural and historic interest in contrast to the front elevation. The relationship of the space with the adjoining Bedroom 2 in terms of being a secondary space proportionally (perhaps in the spirit of the original plan form) would remain unchanged. The creation of additional cupboards accessed from the central corridor/entrance hall will also affect only the partitions dating from the 1960s and would have no real impact on the existing layout of the entrance hall and corridor. **The proposal is therefore considered to have a negligible impact on the significance of the listed building.**
- 6.7. It is proposed to create a new doorway opening between the reception room and the dining room. The principle of providing additional openings within the party walls without harming any historic fabric or plan form has been established on the first floor flat beneath No. 33, where consent was recently given for the provision of two additional openings in the party walls adjacent to the front windows (ref. 2019/5454/P). One of the openings was located in the same section of party wall (ie between the original Nos. 14 and 15) in which it is now proposed to create an opening at second-floor level; the fact that this party wall on the first floor was found to be of concrete construction makes it highly likely that the same would be the case directly above it at No. 33. The proposal would not therefore harm any historic fabric. It is proposed to use a jib door on each side of the proposed opening in the party wall, which was found to be acceptable by the Council in 2020 within the first floor flat, in order to sustain an appreciation and understanding of the lateral separation between the former townhouses. Furthermore, the legibility of the historic separation is already evident from within the reception room by nature of the substantial chimneybreast and this would not be affected detrimentally by the introduction of jib doors. **The proposal is therefore considered to have a minimal and neutral impact on the significance of the listed building.**
- 6.8. It is proposed to reinstate an appropriate chimneypiece within the existing reception room. This was formerly the principal bedroom of the townhouse at No. 14 Cumberland Terrace and is the only location within the present No. 33 where a chimneybreast survives. The existing arrangement is inappropriate to the character of the room and any appreciation of the historic plan form and hierarchy of the spaces of the original townhouse. The proposed new chimneypiece would match the standard Regency-era design

of those recorded within the terrace by the *Survey of London* – distinctive bulls-eye corner roundels and reeded jambs. **The proposal is considered to enable a better appreciation and understanding of the space as a former principal bedroom and is considered to have a minimal and positive impact on the ability to appreciate and understand the significance of the listed building.**

- 6.9. It is proposed to widen the existing doorway from the entrance hall into the existing dining room to provide a double door. The doorway and partition both date from the 1960s reconstruction works and there is no relationship with the historic plan form. No historic fabric would be harmed by the proposals. Some alterations appear to have been made in 2005, when the existing door was re-hung. **The proposal is therefore considered to have a negligible impact on the significance of the listed building.**
- 6.10. It is proposed to widen the doorway from the corridor into Bedroom 2 and to create a new opening from this bedroom into the proposed new ensuite within the existing kitchen area. The partitions both date from the 1960s reconstruction works and there is no relationship with the historic plan form. A sense of the proportionality of the principal rear room, which to some degree reflects the historic plan form, would be unaffected given the proposed provision of a jib door from the bedroom into the proposed ensuite bathroom. The existing doorway to the corridor was created in 2005. **The proposal is therefore considered to have a negligible impact on the significance of the listed building.**
- 6.11. It is proposed to extend the existing ensuite bathroom within the master bedroom to provide shower facilities and a new cupboard for a hot water tank. The footprint of the existing bathroom and tank cupboard dates from the early 1960s, but its relationship with the master bedroom and the proportionality of the bedroom space were substantially changed in 2005 when the 1960s subdivisions were removed. The proposals would have minimal impact on the existing proportions of the master bedroom, which has no relationship with the historic plan form of the rear of the townhouse at 16 Cumberland Terrace since the lateral conversion. **The proposal is therefore considered to have a negligible impact on the significance of the listed building.**
- 6.12. It is proposed to renew the servicing and to include the provision of comfort cooling. Although not usually acceptable in historic buildings, the design of a system of comfort cooling was consented in 2020 within the first floor flat below (ref. 2019/5454/P). The proposal here uses the same principle as established within the first-floor flat in order to have no impact on any historic fabric and to have minimal if any impact on an appreciation and understanding of the character of the spaces. The proposed system would use the existing outlet to the rear elevation which currently serves the kitchen, and so there would be no need for any new or additional penetrations to the rear elevation. The main piece of equipment would be located within a new void proposed above the new bathroom within the existing kitchen area. A dropped ceiling of 200mm would be required to accommodate the unit, but this is an internalised space away from the principal spaces at the front of the flat and now very much a secondary area that was originally the stairwell to No. 15. The balance of the equipment would be housed within the proposed service cupboards in the corridor (as detailed above 6.6). The fan coils within the principal rooms would be discreetly located within built-in furniture as was achieved in the first-floor flat below. **The proposals would therefore have minimal if any impact on an appreciation and understanding of the significance of the listed building.**

- 6.13. Overall it is considered there would be a **minimal to negligible and neutral impact on the significance of the Grade I listed building at 33 Cumberland Terrace and a negligible impact on the character and appearance of the Regent's Park Conservation Area. There will be no impact on the setting of the Grade I Registered Park and Garden as all the proposals are internal.** The proposals will not harm any historic fabric or plan form of significance; rather the proposals within the front room of the former townhouse at 15 Cumberland Terrace are considered to enable a better appreciation and understanding of the historic plan form, whilst the reinstatement of an appropriate chimneypiece within the reception room would enhance a better appreciation of the character of that originally principal bedroom. Any fragmentary legibility of the lateral separation between the three townhouses will be sustained. The important contribution made by No. 33 to the overall architectural composition of Cumberland Terrace and to the character and appearance of the Conservation Area will not therefore be affected or harmed.

7.0. POLICY COMPLIANCE AND JUSTIFICATION STATEMENT

7.1. Camden Local Plan (2017)

- 7.1.1. The Local Plan was adopted by the Council on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.

7.1.2. Policy D2 deals with heritage:

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.

The proposals are considered to cause no harm to the significance of the Grade I statutorily listed subject site or to the character and appearance of the Regent's Park Conservation Area.

Conservation Areas

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;*

The context of the subject site has been assessed fully in relation to its contribution to the character and appearance of the Regent's Park Conservation Area, particularly the front elevation which contributes to the grand architectural composition of Cumberland Terrace which forms part of key views on the eastern edge of the Park. The proposals are all internal and will not be perceptible from the public or private realm within the Conservation Area. As per the consented scheme in 2014, the proposed kitchen cabinetry (the kitchen is proposed to be relocated to the front of the building) has been located to the rear part of the room away from the window so any paraphernalia will not be seen from the exterior; furthermore, the second-floor location beneath the portico will also prevent any kitchen cabinetry etc from being seen in key views towards the terrace. There is therefore considered to be a negligible impact on the character and appearance of the Conservation Area.

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.

The proposals have been based on a detailed understanding of the history and development of the statutorily listed building which has informed an understanding and appreciation of the relative significance of its constituent elements. The proposals are considered to sustain the heritage values identified in this Heritage Statement, which are derived almost exclusively from the front and side elevations looking over Regent's Park. The proposals will not harm any historic fabric of significance, as all internal partitions, joinery and architectural detailing date from the 1960s reconstruction of the interior behind the retained and restored façade. The existing lateral plan form and layout has no relationship with the historic second floors of the three townhouses. The legibility of the lateral separation between the historic houses is difficult to understand, although still readable between 14 and 15 given the presence of the chimneybreast. The proposed additional opening in this party wall is not considered to harm any historic fabric (the party wall is highly likely to be concrete); the fragmentary legibility of the lateral separation between the houses will be sustained by the use of a jib door. The reinstatement of an appropriate chimneypiece within the reception room would enhance a better appreciation of the character of that former principal bedroom to the original townhouse at No. 14. The proposed comfort cooling system would have minimal if any impact on the character of the internal spaces and reflects the consented system within the first floor flat below.

The proposals therefore comply with Policy D2 in relation to Conservation Areas and Listed Buildings.

7.2. London Plan (2016)

7.2.1. The London Plan is the overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2036. Chapter 7 sets out policies on a range of issues about the places and spaces in which Londoners live, work and visit. The policies are designed to create a city of diverse, strong, secure and accessible neighbourhoods, and a city that delights the senses which has the best of modern architecture while also making the most of London's built heritage (London Plan, para. 7.1.).

7.2.2. **Policy 7.8** deals with heritage assets and archaeology:

- **A** 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.
- **C** Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- **D** Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

The proposals have been based on a detailed understanding of the heritage significance of the subject site. The proposals are considered to be subordinate to the historic interest of the listed building and will not affect any historic fabric or any appreciation and understanding of the significance of the Grade I listed terrace as a whole, which is derived almost exclusively from its principal front elevation facing Regent's Park. **The proposals therefore comply with Policy 7.8 of the London Plan.**

7.3. The National Planning Policy Framework (February 2019)

7.3.1. The revised National Planning Policy Framework (NPPF) was introduced in February 2019 and provides a full statement of the Government's planning policies.

7.3.2. The NPPF contains a presumption in favour of sustainable development sympathetic to the conservation of designated heritage. The government's definition of sustainable development is one that incorporates all the relevant policies of the Framework, including the protection and enhancement of the historic environment.

7.3.3. Relevant NPPF Policies are found in Section 16 "Conserving and Enhancing the Historic Environment".

7.3.4. Section 16 deals with Conserving and Enhancing the Historic Environment. Paragraph 184 states that heritage assets "an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations".

Paragraph 194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- *a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- *b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

Paragraph 196. 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.

It is considered that the proposal would not cause any damage or loss of significance to the statutorily listed building or the Conservation Area. Efforts have been made as far as possible to better understand the historical development of the building and the significance of its fabric and plan form in order to avoid any harm. The proposals will not detract from an appreciation and understanding of the significance of the listed building, which is derived almost exclusively from its retained and restored front elevation to Regent's Park; indeed, the proposed opening-up of the front room of the original house at No. 15 will enable a better appreciation and understanding of the proportions and plan form of the second floor, whilst the reinstatement of an appropriate chimneypiece within the reception room would enhance a better appreciation of the character of that former principal bedroom to the original townhouse at No. 14. There will be a minimal to negligible and neutral impact on the significance of the listed building and a negligible impact on the character and appearance of the Conservation Area. Therefore, it is argued that the proposals have placed the required "great weight" on the conservation of the Grade I listed building and will not cause loss or harm to the significance and setting of any heritage assets; the proposals will

constitute neither substantial nor less than substantial harm. **The proposals therefore comply with Section 16 of the NPPF.**

7.4. National Planning Guidance (PPG)

7.4.1. Revised in July 2019, the PPG is an online guidance resource which is updated continuously.

7.4.2. Paragraph: 002 Reference ID: 18a-002-20190723 - What is meant by the conservation and enhancement of the historic environment?

- *The conservation of heritage assets in a manner appropriate to their significance is a core planning principle...Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets...In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time.*

The proposals recognise that the conservation of heritage assets must be in a manner appropriate to its determined significance and that heritage assets are an irreplaceable resource. Equally important is the definition of 'conservation' as the 'active process of maintenance and managing change'. This is implicit in the appropriate works to the Grade I statutorily listed subject site by nature of limiting proposals to fabric of little if any intrinsic architectural or historic significance.

7.4.3. Paragraph: 008 Reference ID: 18a-008-20190723 - How can proposals avoid or minimise harm to the significance of a heritage asset?

- *Understanding the significance of a heritage asset and its setting from an early stage in the design process can help to inform the development of proposals which avoid or minimise harm. Analysis of relevant information can generate a clear understanding of the affected asset, the heritage interests represented in it, and their relative importance.*

A detailed significance assessment has been undertaken as part of this application and its findings incorporated into the scheme. Visual inspection of the building informed constraints and opportunities and there was a conscious effort to minimise the impact of the proposed works upon the significance of the statutorily listed subject site and the Conservation Area.

8.0. CONCLUSION

8.1. The proposals have been designed so as to cause no harm to the statutorily listed No. 33 Cumberland Terrace or the Regent's Park Conservation Area. Whilst the front and side elevations of the subject site possess high architectural and historic interest, the interior which was reconstructed during the early 1960s and has been altered since makes at best a neutral contribution to appreciation and understanding of the significance of the building. It is considered that the values which express the special architectural and historic interest and setting of the Grade I statutorily listed building will be sustained – there will be no harm caused by any of the proposals because the proposals affect only 20th

century fabric and layout of little or no significance. The existing fragmentary appreciation of the lateral separation between the original townhouses will be sustained.

- 8.2. **The proposals are considered to have a minimal to negligible and neutral impact on the significance of the Grade I statutorily listed subject site and a negligible impact on the character and appearance of the Conservation Area.** Indeed, the proposals are considered to enable a better appreciation and understanding of the historic proportions and plan form of the principal front second-floor room within the original house at No. 15, whilst the reinstatement of an appropriate chimneypiece within the reception room would enhance a better appreciation of the character of that former principal bedroom to the original townhouse at No. 14.
- 8.3. The applicant has recognised the importance of performing investigations and analysis necessary for the assessment of the effects of the proposed works on the special interest of the surrounding heritage assets. This approach has been beneficial with regard to the process of acknowledging the best practice guidance as outlined in the NPPF and in local policies. It is considered that the information provided in this Heritage Statement is proportionate to the exceptional significance of the subject site. It sets out an appropriate level of detail sufficient to understand the potential heritage implications of the proposals in accordance with the proportionate approach advocated by Paragraph 189 of the NPPF.
- 8.4. The proposals are considered to sustain the special historic and architectural interest of the statutorily listed building by preserving those elements of significance that have been identified as contributing to that special interest and removing those elements which are neutral or detrimental to that interest. It is therefore concluded that the proposed works satisfy the relevant clauses of the NPPF. These are consistent with the spirit of local, regional and national planning policies and conservation principles.

APPENDIX 1: LIST DESCRIPTION

Heritage Category: Listed Building

Grade: I

List Entry Number: 1067386

Date first listed: 14-May-1974

Statutory Address: NUMBERS 1-59 AND ATTACHED RAILINGS, 1-59, CUMBERLAND TERRACE

District: Camden (London Borough)

National Grid Reference: TQ 28688 83102

TQ2883SE CUMBERLAND TERRACE 798-1/82/290 (West side) 14/05/74 Nos.1-59 (Consecutive) and attached railings

GV I

Monumental palace-style terrace of 59 houses. c1827. By John Nash and J Thomson. For the Commissioners of Woods, Forests & Land Revenues. Built by JG Bubb; arches built by WM Nurse. Stucco. Houses in 3 blocks linked by "triumphal" arches leading into 2 courtyards with pairs of houses and drives leading to former mews. Terrace approximately 240m long. EXTERIOR: central block (Nos 20-49): 4 storeys and basements. Central projecting Ionic decastyle pedimented portico of Giant Order, flanked by slightly less projecting similar single bays with paired columns and attic storeys. Rusticated ground floor, with square-headed doorways with patterned fanlights and panelled doors where not converted for use as windows, forming a podium. Cast-iron balconies between columns. Entablature topped by balustraded parapet with vases and sculpture of figures on dies. Tympanum filled with sculpture of allegorical figures and figurative acroteria at angles. Flanking the portico, 11 bays of rusticated ground floor and Ionic pilasters rising through 1st and 2nd floors to carry entablature at 3rd floor level; cornice and blocking course above attic storey. Architraved sashes to upper floors; 1st floor with continuous cast-iron balcony. Terminating bays forming projecting single bay pavilions similar to single bays flanking pedimented section of portico. "Triumphal" Arches: linking the central and outer blocks. Single, central, architraved archway flanked by paired Ionic columns carrying an entablature and blocking course. Linked to the blocks by rusticated stucco screen walls. Outer blocks (Nos 1-17 & 52-57): 11 bays each similar to those flanking central portico and terminating in similar bays at each end. End houses of blocks with stucco pilastered porticoes on returns. Pairs of houses in courtyards behind Arches (Nos 18 & 19 and Nos 50 & 51): stucco with slated roofs and central chimneys. 2 storeys and basements. 5 windows. Corinthian pilasters rise through ground and 1st floors to carry modified entablature with cornice at eaves level surmounted by arcaded parapet. Pilastered porticoes with round-arched entrances. Recessed sashes; ground floor tripartite. Plain 1st floor sill band. Nos 58 & 59: pair of houses set back from terrace at north end. Stucco with rusticated ground floor and projecting pilasters at angles. 3 storeys and basement. 3 windows in all. Projecting centre bay with coupled entrances flanked by pilasters and surmounted by parapet of Greek fret pattern with acroteria on dies. Square-headed doorways with fanlights and panelled doors. Recessed sashes, upper floors architraved; 1st floor with balconies to flanking sashes and central pedimented, tripartite casement. Cornice at 2nd floor level breaking forward with pilasters; similar above 2nd floor with blocking course. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with tasselled spearhead finials to all areas and gardens of Nos 58 & 59. HISTORICAL NOTE: designed to give the appearance of a palace overlooking the natural landscape of Regent's Park. The King's guinguette, had it been built, would have stood almost opposite. (Survey of London: Vol. XIX, Old St Pancras and Kentish Town (St Pancras II): London: -1938: 116).