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# PLANNING, DESIGN, ACCESS AND HERITAGE STATEMENT

June 2022

*Flats 4, 5 and 6,  
113 Gloucester Terrace,  
London, W2 3HB*

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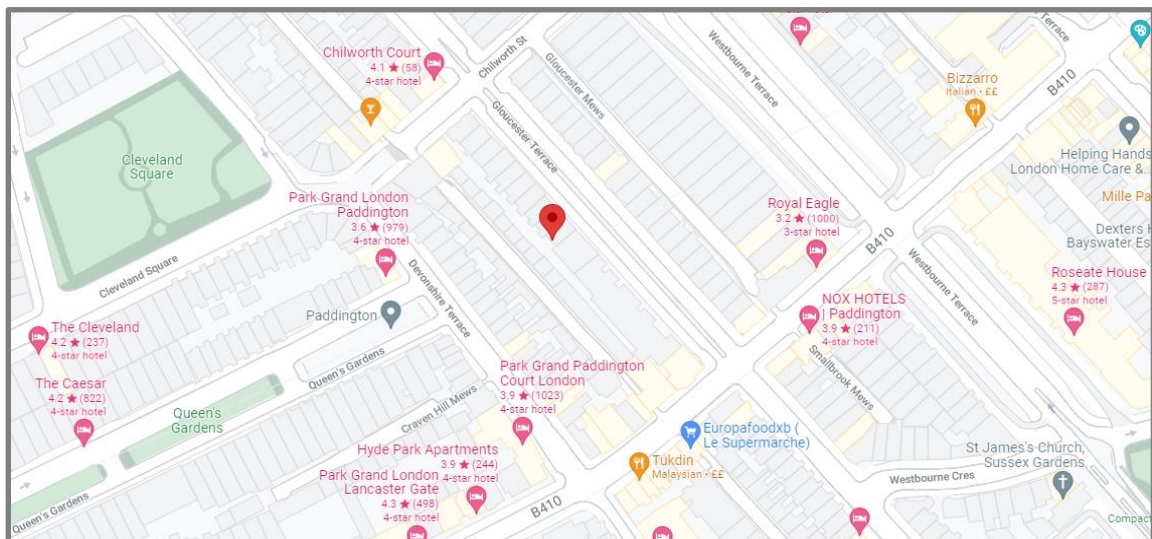
Noise Impact Assessment - 113 Gloucester Terrace – Rev A

## 1.0 Introduction and Aims

- 1.1 This Planning, Design, Access & Heritage Statement has been prepared by Drawing and Planning Ltd, Mercham House, 25-27 The Burroughs, London, NW4 4AR (0208 202 3665).
- 1.2 This statement has been submitted on behalf of the applicant, in support of a part retrospective part-proposed application, seeking planning permission and listed building consent for the retention and installation of air conditioning units to the rear of the building, serving Flats 4, 5 & 6 respectively.
- 1.3 This part retrospective application seeks to retain the two existing air conditioning units, installed to serve Flats 5 & 6, arranged over the third-floor level, whilst proposing to relocate the external condenser units to a more appropriate location out of sight. In addition, this application, proposes the installation of two additional air conditioning units, proposed to serve the maisonette flat (Flat 4) arranged over the first and second floor levels. Associated internal alterations, to facilitate the proposed air conditioning units within the existing residential Building.
- 1.4 This joint application will look to outline the design principles of the development and address the access and streetscape amenity issues.
- 1.5 The proposed plans to accompany this application, have been designed by Drawing and Planning Ltd and the detailed drawings to accompany this application are attached.

## 2.0 The Site

- 2.1 The subject site, located at 113 Gloucester Terrace, London, W2 3HB, is a Grade II Listed, four storey, mid-terrace residential building, built circa 1840, located close to Paddington Station, within the Bayswater Conservation Area of the City of Westminster. The host building is situated on the western side of Gloucester Terrace, accessed via its ground floor level entrance.



**Fig. 1:** Map, showing the location of 113 Gloucester Terrace, London, W2 3HB

- 2.2 The host building is arranged as multiple self-contained residential flats. This application is submitted as a joint proposal, serving Flats 4, 5 & 6 only. The surrounding area consists of a mix of residential flats & houses of varying styles and ages of construction.



**Fig. 2:** Extract from Historic England Maps, showing the location of 113 Gloucester Terrace and various neighbouring listed buildings in close proximity



**Fig. 3:** Front elevation of 113 Gloucester Terrace

### 3.0 Relevant Planning History

3.1 Application No: 21/08352/FULL dated 14 APRIL 2022

Relocation of 2 air-conditioning units from rear roof to rear third floor roof with louvred screening serving flats 5 and 6; installation of 2 additional air-conditioning units at rear third floor roof to serve flat 4 and associated works. (Linked with 21/08353/LBC)

3.2 Enforcement DP/PET/21/74958/K – Stephen Pavett, 07866 034 463,  
[spavett@westminster.gov.uk](mailto:spavett@westminster.gov.uk)

Unauthorised installation of two air-conditioning units on the main roof at 113 Gloucester Terrace, London, W2 3HB

### 4.0 Planning Policy Considerations

4.1 This section details national and local policies relevant to alterations and extensions to listed buildings and properties in conservation areas.

#### 4.2 National and Regional Policy

The NPPF, specifically Chapter 12 entitled ‘Conserving and Enhancing the Historic Environment’ notes that *“local planning authorities should set out in their Local Plan a positive strategy for conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:*

- *The desirability of sustaining and enhancing the significance of heritage assets and putting those viable uses consistent with their conservation;*
- *The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- *The desirability of new development making a positive contribution to local character and distinctiveness; and*
- *Opportunities to draw on the contribution made by the historic environment to the character of place”*

4.3 Paragraphs 132 states 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’. The paragraph continues to state that ‘Substantial harm to or loss of a grade II listed building, park or garden should be exceptional’.

4.4 Paragraph 134 states that ‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal’.



#### London Plan 2021

- 4.5 The London Plan (March 2021) provides the most up-to-date Spatial Development Strategy for Greater London. London Plan Policy HC1 - Heritage conservation and growth, deals with heritage assets and archaeology. Chapter B, states that: *'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.'*

#### The City Plan – April 2021

- 4.6 Chapter 39, entitled Westminster's Heritage, is most relevant to this application given its conservation interests. Part B of Chapter 39 states that *'Development must optimise the positive role of the historic environment in Westminster's townscape, economy and sustainability, and will:*

1. *ensure heritage assets and their settings are conserved and enhanced, in a manner appropriate to their significance;*
2. *secure the conservation & continued beneficial use of heritage assets through their retention and sensitive adaptation which will avoid harm to their significance, while allowing them to meet changing needs and mitigate & adapt to climate change;*
3. *place heritage at the heart of place making and good growth, maintaining the unique character of our heritage assets and delivering high quality new buildings and spaces which enhance their settings.*

- 4.7 Chapter 40, entitled Townscape and Architecture, advises that *'Developments should be sensitively designed, having regard to the prevailing scale, heights, character, building lines and plot widths, materials, architectural quality and degree of uniformity in the surrounding townscape'.*

- 4.8 The Policy background goes on to state at 40.14 that *'Even small-scale alterations and additions can have a cumulative impact on townscape character. The design of new doors, windows or shopfronts should be carefully considered to relate sensitively to the existing building and adjoining townscape. Additions such as plant, balustrades, fire escapes routes, telecommunications equipment, cameras & alarms, micro-generation equipment, any associated cables and fixings, as well as air conditioning units, flues and water tanks should always be carefully designed, sited and detailed or screened where appropriate.*

#### SPG – Repairs and alterations to Listed Buildings

- 4.9 Of equal weighting and consideration to the proposed works is the advice given within the supplementary planning guidance on repairs and alterations to Listed Buildings. The extracts below are considered to be of significance to the approach being proposed for this scheme.

#### **Paragraph 5.4: Alterations to listed buildings**

- 4.10 *'In general, works to listed buildings should retain historic fabric and features of architectural or historic interest in situ and repair all damaged historic fabric or features, rather than replace them. The City Council encourages the reinstatement of missing architectural features where there is clear evidence of their original appearance.*

- 4.11 *When repair, alterations or extension works are justified, they must relate sensitively to the original building and will require craftsmanship and professional skill of a high standard. In almost all cases the materials used for alterations, extensions or repairs should match the original.'*

**Paragraph 6.30: Internal Services**

- 4.12 *'The installation of concealed services generally does not require consent, provided that the historic fabric of the building is not damaged or the structure altered. The installation of visible service fittings such as radiators, smoke detectors, alarm panels, security devices and ventilation grilles will require consent where these affect the special character of historic interiors, and in significant interiors particular care should be exercised in the design and siting of such fittings.'*
- 4.13 *Additionally, 'New services such as air conditioning, extract ducting, computer trunking, and heating systems, must be carefully designed to minimise their impact on the fabric and appearance of historic interiors. This is often achieved by using non-conventional solutions. Suspended ceilings concealing air conditioning ducts, for example, will not normally be acceptable in historic interiors. The installation of air-conditioning in a historic building may be acceptable if the necessary pipework or trunking, the external cooling equipment and internal units can be sensitively integrated with the building. Such installations should be clearly specified and described as part of any application for refurbishment, so that their appearance and impact can be fully understood'.*

## **5.0 Proposal**

- 5.1 This application has been submitted following on from the recent refusal 21/08352/FULL which sought joint part-retrospective part-proposed application, seeking planning permission and listed building consent for the retention and installation of air conditioning units to the rear of the building, serving Flats 4, 5 & 6 respectively.
- 5.2 This part-retrospective application seeks to retain the two existing air conditioning units, installed to serve Flats 5 & 6, arranged over the third-floor level, whilst proposing to relocate the external condenser units to a more appropriate location, screened from view. In addition, this application, proposes the installation of two additional air conditioning units, proposed to serve the maisonette flat (Flat 4) arranged over the first and second floor levels. Associated internal alterations, to facilitate the proposed air conditioning units within the existing residential Building.
- 5.3 This application has sought to provide a clear and detailed set of drawings, showing the building in its current form, identifying the location of the as-installed air-conditioning units, currently placed at roof level fronting the rear of the building. In conjunction with the relocation of the air-con units, the drawings as submitted, clearly show the routes of plant supply ducts as well as detailed pipework and the placement and fixing details for the proposed plant.

- 5.4 To facilitate the retention of the existing condenser units, this application seeks to relocate the external units to the lower terrace level, which has long established screening taking the external units out of view. In conjunction with the screening as proposed, the units would not be visible from any public vantage point. It is therefore believed that the relocated units would not cause any harm to the character of the building.
- 5.5 As part of this application, the proposal will see the placement of two additional outdoor condenser units, installed to serve Flat 4, placed to the rear of the building at terrace level. These outdoor units will be connected to the corresponding indoor fan units, to provide air conditioning to the respective flats within the building, with two of the indoor fan units, added to Flat 4 at first floor level plus two indoor fan units, added to Flat 4 at second floor level to serve two of the bedrooms.
- 5.6 At third floor level, the existing six indoor fan units, installed to Flats 5 & 6, would be retained as existing, which currently serve both bedrooms to either flat plus the respective living room dining room areas.
- 5.7 The proposal would also comprise of the installation of the pipe network to connect the outdoor and indoor units. It should be noted that all pipework will be boxed/enclosed in order to preserve the internal and external appearance of the subject site. Subject to support from the LPA for the development as proposed, the applicant would expect an appropriately worded condition requesting a scheme of enclosure of the external ducts to look like drain pipes. This form of condition would be welcomed.
- 5.8 As part of this proposal, a detailed Noise Impact Assessment was carried out by a sound specialist firm - Clement Acoustics (please refer to report attached) to ensure that the proposed air conditioning units would not cause any harm to the surrounding area, benefiting from the proposed bespoke screening louvered enclosure of the external units.
- 5.9 As part of the installation process, it is proposed that the new Air Conditioning system be controlled by timed electrical supply, to operate the system and reduce any noise levels. This mitigation measure would enable the proposed scheme to meet the most stringent recommendations of the British Standard.

5.10 **Refusal Reason 1**

*Because of their size, position and design the proposed external air-conditioning units and their associated acoustic enclosures would harm the special architectural appearance of this grade II Listed building. It would also fail to maintain or improve (preserve Or enhance) the character and appearance of the Bayswater Conservation Area. This would not meet Policies 38,39 And 40 of the City Plan 2019 - 2040 (April 2021)*

**Proposed Mitigation:**

The proposed external air-conditioning units and external enclosures have been relocated to the rear terraces out of sight and not causing any visual harm. The external pipework will be within cast iron drainage pipework. Flats 4, 5 and 6 are modernised and no internal historical features will be impacted.



## **Refusal Reason 2**

*Your drawings do not include enough details of the internal works to the building's interior for us to assess how your plans would affect the building. We believe that the work could harm the special interest of the building. This would not meet Policies 38 and 39 of the City Plan 2019-2040 (April 2021) and the advice set out in our 'Supplementary Planning Guidance: Repairs and Alterations to Listed Buildings'.*

### **Proposed Mitigation:**

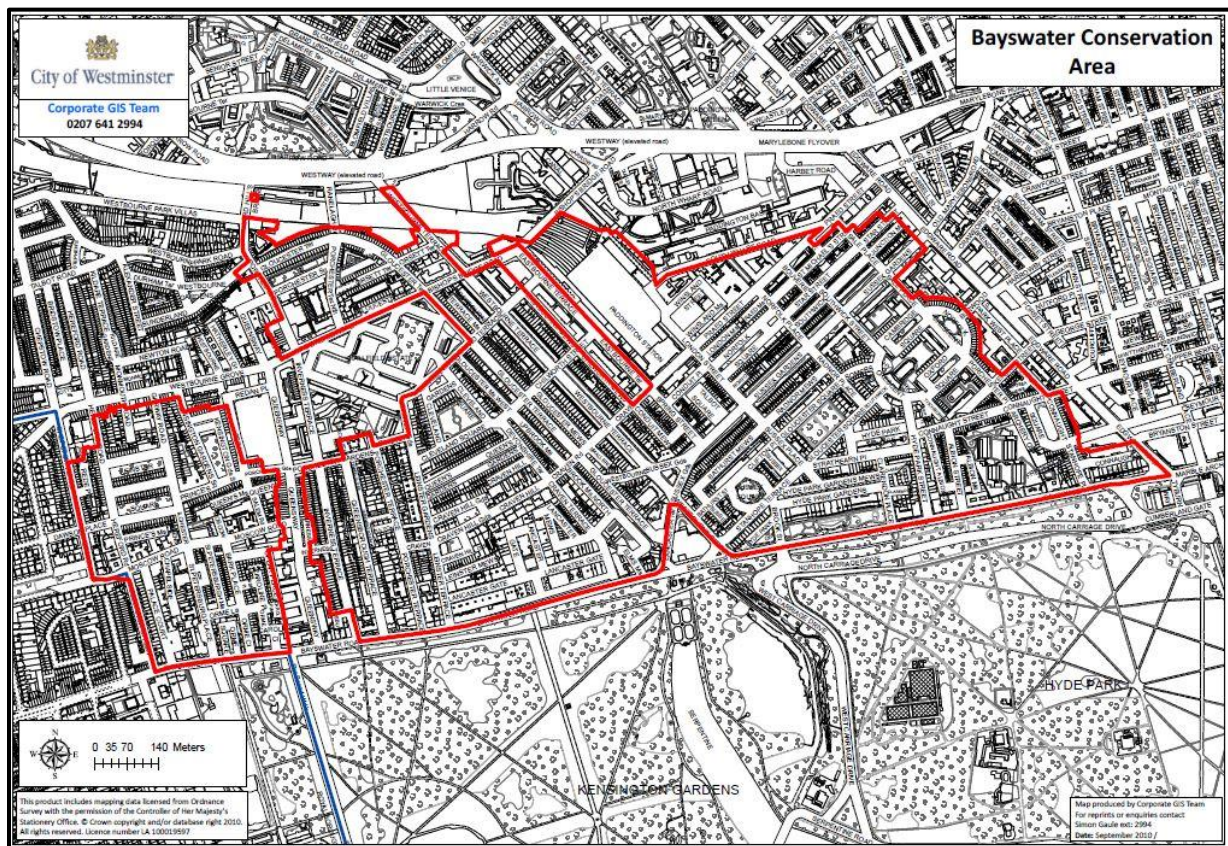
The drawings within this application have been enhanced to contain further detail to help officers understand the detail of the internal and external works being proposed. We have followed the advice set out in the Planning Guidance.

- 5.11 This application aims to overcome the previous concerns, lack of detail and propose a new discreet location for the external units. This application is to remedy concerns which were raised by planning enforcement 3.2 above. The sole source of heating for flats 5 and 6 is from the air conditioning units.

## **6.0 Heritage Impact Assessment**

- 6.1 Bayswater Conservation Area was first designated on 9 Nov 1967 and was subsequently extended on the 23 Oct 1978, 20 Nov 1990 & finally, on the 1 May 2002.
- 6.2 The initial designation covered the original nineteenth century development which defines the essential character of the area. The development of Bayswater as a fashionable residential area commenced in 1827 when the surveyor to the Bishop of London laid out the area between Praed Street, Edgware Road and Bayswater Road and development extended westwards as the century progressed. The scheme was carried out in a grand manner in the form of an inter-related pattern of wide streets, crescents and squares planned on either side of the two main boulevards, Westbourne Terrace and Sussex Gardens.
- 6.3 The conservation area benefits from several large areas of nineteenth century architecture of predominantly stuccoed terraces of housing with a variety of later, predominately residential developments, in between. The area around the two grand boulevards of Westbourne Terrace and Sussex Gardens includes Gloucester Terrace and comprises thoroughfares of fine classical terraces on a grand scale. The composition of streets and Squares from this time is of particular value bringing unity to the buildings of this period. A variety of development from later periods follows the original street pattern, most notably Norfolk and Hyde Park Crescents.
- 6.4 The area includes streets and mews such as Star Street and Bathurst Mews of smaller scale whilst the monumental Lancaster Gate development frames the spire of the former Christ Church and forms a splendid 'entrance' to the complex of buildings further north.
- 6.5 The character of the area remains predominantly residential, with many of the larger houses converted into flats, and numerous mansion blocks. There are also local shops,

including along the southern side of Praed Street, and a series of open spaces with fine trees and formal squares, all forming essential elements in the townscape composition and character of the area. The built edge of Bayswater Road on the southern boundary forms the backdrop to Hyde Park and Kensington Gardens.



**Fig 1:** Map of Bayswater Conservation Area

- 6.6 The current application, seeks retrospective Listed Building Consent for the installation of an air-conditioning system, serving the top two flats (Flats 5 & 6) and the installation of a matching system to the existing first floor maisonette (Flat 4) at 113 Gloucester Terrace London W2 3HB. The subject building is registered as Grade II Listed.
- 6.7 It is noted that numbers 105-123 Gloucester Terrace, London W2 are all listed Grade II under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended. The terrace was first listed on the 14<sup>th</sup> Jan 1970. The building benefits from a Historic England List Entry number: 1289206.
- 6.8 The listing dates the row of houses to circa 1840 and gives the following description: Stucco. Slate mansards. 3 storeys and basement (No 119 heightened) 2 windows wide. Each house comprising full height segmental bow to left with single tripartite window to each floor and to right a slightly projecting fluted Doric porch with semi-circular architraved windows above. Rusticated quoins. Channelling to ground floor. Windows mainly sashes. Some casements, plate glass. Continuous bombe balcony to first floor.

Dentil cornice, balustraded parapets. Area balustrade mostly removed. One of a series of similar rows lining Gloucester Terrace.

- 6.9 The City Council's recommendation on alterations to listed buildings have been taken into account when designing the proposed scheme to minimize the impact of the development on the subject listed building. The location of the proposed plant to the rear of the building, set within louvered enclosures, will have minimal effect on the setting of the building in the street scene. As such, no air conditioning unit or pipework would be visible from any public vantage point to protect the external appearance of the building.
- 6.10 Furthermore, the placement of the indoor air conditioning unit and pipework have been designed to reduce their impact on the historic internal fabric and integrate them to the building, as shown on the attached plans.

## 7.0 Listing Description

- 7.1 The application site was listed as Grade II on 14 Jan 1970. The list description from the survey by English Heritage states:

*'TQ 2681 SW City of Westminster Gloucester Terrace, W2 51/33 (west side) 14.1.70 (Nos 111 to 123 only) Nos 105 to 123 (odd) 1.5.86 (Nos 105 to 109 only) GV II Row of houses. Circa 1840. Stucco. Slate mansards. 3 storeys and basement (No 119 heightened) 2 windows wide. Each house comprising full height segmental bow to left with single tripartite window to each floor and to right a slightly projecting fluted Doric porch with semi-circular architraved windows above. Rusticated quoins. Channelling to ground floor. Windows mainly sashes. Some casements, plate glass. Continuous bombe balcony to first floor. Dentil cornice, balustraded parapets. Area balustrade mostly removed. One of a series of similar rows lining Gloucester Terrace.'* Listing NGR: TQ2638081094.

## 8.0 Access and Parking

- 8.1 The proposed scheme will not affect existing parking and access arrangements and in this regard the proposal is considered acceptable and policy compliant.

## 9.0 Conclusion

- 9.1 The subject property, supports a Grade II listed building. This part-retrospective application seeks Planning & Listed Building Consent for the retention of the two existing air conditioning units, installed to serve Flats 5 & 6, arranged over the third-floor level, whilst proposing to relocate the external condenser units to a more appropriate location, screened from view. In addition, this application, proposes the installation of two additional air conditioning units, proposed to serve the maisonette flat (Flat 4) arranged over the first and second floor levels. Associated internal alterations, to facilitate the proposed air conditioning units within the existing residential Building.
- 9.2 The proposed works will greatly enhance the usability of the subject flats by incorporating air conditioning units to the building. The proposed works will not adversely affect the design and appearance of the existing building or surrounding properties.
- 9.3 Compassionate grounds – Flat 4 has been lived in by the same family for 3 generations and the owner relied on advice of Pimlico Plumbers to install the external units without planning consent. The owner of this property is a nice honest family who want to heat and cool their flat. Flats 5 and 6 are rental properties and are solely heated by the air-conditioning units.
- 9.4 The works are viewed to be fully compliant with the relevant planning policies and the key heritage themes contained within the National Planning Policy Framework and the relevant Development Plan Policies in the form of the London Plan 2021, the Westminster City Plan 2021 and the advice contained within the SPG relevant to repairs and alterations to Listed Buildings.
- 9.5 For the reasons outlined within this statement, it is respectfully requested that Council move to Grant Planning Permission & Listed Building Consent.