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Cunard House, 15 Regent Street, Westminster, London, SW1Y 4LR
Planning (Listed Buildings and Conservation Areas) Act 1990
Application for Listed Building Consent

We write on behalf of The Crown Estate ("TCE"), to submit an application for listed building consent at Cunard House, 15 Regent Street, Westminster, London, SW1Y 4LR (the "Site").

Listed Building Consent is sought for:

"Works of repair and restoration to the external elevations and roof including cleaning of stonework, masonry, render repairs and repointing, stonework and brickwork repairs and replacement as necessary, along with repairs to the flat roofs, windows, lead flashing repairs and concrete repairs and other associated works."

Background

The Crown Estate ('TCE') has a commitment to ensuring their buildings are representative of a world-class city and to build upon the outstanding heritage of the West End. TCE therefore actively manage and invest in their buildings to upgrade and maintain its properties, many of which are listed. Indeed, a series of listed building consent to repair and restore some of their listed assets in the Regent Street and St James areas were approved by Westminster City Council ("WCC") last year, namely, 172 Regent Street (ref. 22/01792/LBC); 2 New Burlington Street (ref. 22/01581/LBC); Heddon House (ref. 22/01674/LBC); Linen Hall (ref. 22/00727/LBC); and 203 Regent Street (ref. 22/01759/LBC).

Site and Surroundings

Cunard House is located on the south west side of Regent Street, St James's. The surrounding area is predominantly commercial comprising office on the upper levels and retail, café and restaurant units at ground floor. The building is Grade II Listed and lies within the Regent Street Conservation Area.

Cunard House is 7 storey commercial building with a mansard roof comprising retail and office space at ground floor and B1 floorspace in the upper floors.

The building was rebuilt behind a retained façade in the late 1980s.

As previously described, the site is Grade II listed. The listing description reads:

TQ 2980 NE and SE CITY OF WESTMINSTER LOWER REGENT STREET, 71/92; 82/4 SW1 (West side)

22.11.73 No. 15 (formerly listed as No 15 (Cunard House, under Regent Street))

GV II

Commercial premises with chambers. c.1839-40 by Decimus Burton with 1970s ground floor shops. Stucco faced, concealed roof. Lofty Italianate facade. 7 storeys, 5 windows wide. 1970s marble faced ground floor with central entrance and flanking quadrant-cornered display windows. Channelled 1st floor, the upper floors plain with recessed sash or casement windows in architraves on sill courses, 2nd floor windows aediculed with Corinthian columns and pediments. Cornices over those on 4th floor; the 1st floor/mezzanine windows are tripartite flanked by panelled piers supporting scrolled consoles to 2nd floor balconettes with cast iron rails whilst the console bracketed balconettes, with similar rails, on 4th floor act as cornices to the 3rd floor windows. Guilloche plat band to 4th floor. Deeply moulded projecting eaves cornice.

Relevant Planning History

A desk-based review of the site's planning history has revealed the following relevant full planning and listed building consent works approved:

Application ref.	Description of works	Decision / Date
20/01290/FULL	Removal of window cleaning cradle and extension of lift at roof level to include a new lift lobby; erection of dormer extension with aluminium framed sliding doors; installation of roof terrace with metal balustrade and associated works	Approved 06 April 2020
15/00259/LBC	Internal alterations at basement and ground floor level including the installation of a secondary staircase	Approved 25 March 2015
09/03772/LBC	Alterations to shopfront including installation of louvres and internal alterations including the installation of partitions.	Approved 10 August 2009
08/09210/LBC	Installation of air conditioning unit and extract fan on roof within existing plant enclosure. Internal alterations at basement and second floor levels to include installation of partitions, showers, lockers and bicycle racks	Approved 02 February 2009

Proposals

As part of TCE's ongoing management and investment in this prominent site in the west end, sensitive repair works are proposed within this Listed Building Consent application and summarised as below:

- Stone cleaning including trial samples
- Stone repairs to facing stonework (provisional)
- Replacement of full section of facing stone (provisional)
- Repointing of cracked and open stone joints
- Lead repairs and application of patination oil including at roof level
- New lead flashings
- Repairs to cracked brickwork
- Repairs to brickwork, stonework following removal of redundant fixings
- Removal of paint finish to railings and redecoration (provisional)
- Stucco render repairs
- Renew asphalt roof covering, like for like (provisional)
- Window repairs using RepairCare specification and spliced timber repairs
- Concrete repairs to spalling concrete frame at roof level

A detailed schedule of works has been submitted as part of this application.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty upon the Local Planning Authority to determine applications affecting listed buildings and pay special regard to the desirability of preserving the building or its setting.

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 places a duty on local planning authorities when considering proposals for development within Conservation Areas to give special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Listed Building Consent works for the site would be assessed against planning policy contained within the National Planning Policy Framework (2021), the London Plan (2021), Westminster's City Plan (2021). The National Planning Policy Guidance and the following local supplementary planning guidance are also further material considerations:

- Repairs and Alteration to Listed Buildings SPG (1995);
- Development and Demolition in Conservation Areas SPG (1996);
- Protection of Historic Buildings in Westminster (2000);
- Regent Street Conservation Area Audit (CCA).

Chapter 16 of the NPPF deals with the proposals affecting Heritage Assets, Paragraph 199 advises local planning authorities that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more

important the assets, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 202 of the NPPF provides a test which requires impact on a Listed Building to be weighed against the public benefits of a development proposals which includes securing optimum use, while no alterations to the Listed Building are proposed, this test is considered relevant in this case.

Policy HC1 of the London Plan seek to conserve heritage assets such as listed buildings and Conservation Areas. It encourages sensitive upgrade of historic and other important buildings, to improve their environmental performance and make them easily accessible. The policy recognises the need to allow Listed Buildings to be suitably adapted to evolve with modern economic circumstances, and by not adapting this can lead to building becoming vacant and neglected, which becomes a considerable danger.

City Plan Policy 39 refers to the heritage environment within Westminster and explains that development must optimise the positive role of the historic environment in Westminster's townscape, economy and sustainability. To achieve this, development should:

- Ensure heritage assets and their settings are conserved and enhanced.
- Secure the conservation and beneficial use of heritage assets, avoiding harm to their significance whilst allowing them to meet changing needs.
- Place heritage at the heart of place making and good growth. Maintaining the unique character of our heritage assets and delivering high quality building and spaces to enhance their settings.

Part (G) relates to works to listed buildings and states that works will "preserve their special interest, relating sensitively to the period and architectural detail of the building and protecting, or, where appropriate, restoring original or significant detail."

City Plan Policy 40 ensures heritage assets and their settings and conserved and enhanced through their retention and sensitive adaptation. Paragraph 39.11 sets out that where listed buildings are at risk through neglect, decay or other threats the Council will support works to bring buildings back into active uses consistent with their heritage value.

Paragraph 2.4 of the Repairs and Alterations to Listed Buildings SPG (1995) sets out that the Council will encourage the proper repair and maintenance of the fabric and structure of historic buildings. Consent will be granted where works are confined to the best possible method of rectifying any defect in the light of the statutory protection placed on the building.

Planning Policy Assessment

The purpose of the proposed works is to ensure proper maintenance and care of the building. The works involve repair or improvement works which will be undertaken on a like-for-like basis, with minimum amount of intervention where possible, to ensure the proposed maintenance and upkeep of the building. The proposed works will offer a positive contribution to the Grade II listed building with no impact on Regent Street Conservation Area.

A Design and Access Statement with integrated Heritage Statement has been prepared by TFT and accompanies this application. The heritage section concludes that the proposed works are of a maintenance nature and all materials will be repaired or replaced on a like-for-like basis, sympathetic to the building, The

proposed works will not cause any harm to the significance of the building and will better reveal the significance of the building by cleaning, repairing and reinstating features that have deteriorated over time.

Notwithstanding this and as outlined within paragraph 202 of the NPPF, it is important to consider the public and wider benefits a scheme could have to enhance the setting and use of the listed building. In this case, whilst we do not consider that any harm would be caused, should others consider that harm may be caused, any perceived harm identified would be negligible in this instance and would be outweighed by the public benefit brought about by the maintenance and improved external appearance of the building, further contributing to the maintenance of the conservation area and the vitality of a major shopping destination within London.

For the reasons set out above, the proposals would sustain the significance of the listed building in accordance with the NPPF. Moreover, the proposed works would preserve the historic context of the listed building and the setting of the conservation area, in accordance with the statutory duties set out in Sections 66, and 72 of the Planning (Listed Buildings and Conservation Area) Act 1990. The proposals would also accord with Policy HC1 of the London Plan and Policies 39 and 40 of the Westminster City Plan.

Application Documents

In support of this application, the following documents are enclosed:

- Completed Application Form (ref. PP-12240004);
- Completed Ownership Certificate B;
- Site Location Plan;
- Design and Access Statement, incorporating Heritage Statement, prepared by TFT;
- Schedule of Works prepared by TFT;
- Fabric Enhancement Programme document, prepared by TFT for KEMPEROL Liquid Waterproofing and other methods of works;
- AkzoNobel Specification Document for decorations; and
- Repair Care International Specification Document for window repairs. Existing and proposed drawings, prepared by TFT.

There is no application fee for a listed building consent application. We trust that we have provided all of the material required for the purposes of validation and therefore await confirmation of the registration and validation of this application shortly.

In the meantime, should you have any queries or require further information, please do not hesitate to contact Maggie Zhu (mzhu@geraldev.com / 020 7333 6354) or Matthew Spencer (m Spencer@geraldev.com / 020 3486 3676) of this office.

Yours faithfully,



Gerald Eve LLP