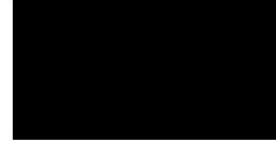




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31 May 2024

Rose Todd and Colette Hatton  
Planning and Regeneration  
2<sup>nd</sup> Floor  
5 Pancras Square  
c/o Town Hall  
Judd Street  
London  
WC1H 9JE

Dear Rose and Colette,

University College London no. 11 Woburn Square, London, WC1H 0NS  
Listed Building Consent for internal works to no. 11 Woburn Square (Planning Portal reference: PP-12903527)

On behalf of our client, University College London ('UCL' or the 'Applicant'), we hereby submit to the London Borough of Camden (the 'Council') an application for Listed Building Consent for internal refurbishment works to Rm 305 and Rm 308 on Level 3 of 11 Woburn Square. The proposed works include overboarding walls with plasterboard and new data cabling. The description of development is:

*"Refurbishment works to Rm 305 and Rm 308 on Level 3 of 11 Woburn Square, including overboarding walls with plasterboard, installation of new data cabling and other associated works"*

#### The Site

The building is Grade II listed (listing reference 1379206) and is located within the Bloomsbury Conservation Area, in Sub Area 2: Gordon Square/Woburn Square/Byng Place. Woburn Square is a rectangular formal garden which was developed by the Duke of Bedford and is overlooked by Georgian terraces. 11 Woburn Square, located on the south side of the square, was built by James Sim, James Sim Jnr and Robert Sim in c.1829 and is listed as part of a group of nine Georgian terraced houses (Nos. 10-18), along with the attached railings and lamp holder. Originally in residential use, the buildings are currently part of the wider UCL Bloomsbury Campus.

The Site is bounded to the north by nos. 55-59 Gordon Square, to the east by UCL Institute of Education and to the west by Woburn Square. Nearby, are a number of listed buildings, including nos. 55-59 Gordon Square (Grade II), nos. 24-28 Woburn Square (Grade II) to the west, and 20 Bedford Way (Grade II\*) to the east.

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The proposed works are internal only and consist of light-touch redecoration works to no. 11 Woburn Square only.

## Pre-application discussion

The proposed works were set out in an email dated 29 January 2024 to the Conversation Officer Colette Hatton who advised that the works required Listed Building Consent.

## Context

This application is part of general refurbishment works to Rm 305 (a kitchen) and Rm 308 (a bathroom) on Level 3 of no. 11 Woburn Square. The works seek to modernise the rooms and enable the building's continued use as university offices. As part of the light-touch refurbishment, some of the works require Listed Building Consent, which form this application. The proposed works will improve the appearance of these rooms and the quality of the facilities for UCL staff and students.

## Proposed Development: Design

It has been proposed to carry out a full strip-out and light-touch refresh of Rm 305 (currently a kitchen) and Rm 308 (currently a bathroom) on Level 3 of 11 Woburn Square. The drawing below shows the location of these rooms.

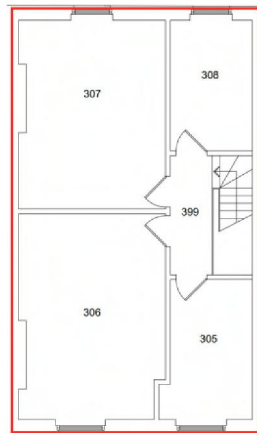


Figure 1 - Level 3 Floorplan (extract from drawing ref. 163/164-01-5)

The following photos show the current state of the kitchen and bathroom that are to be refurbished and the modern fittings that are to be removed as part of the works.



Figure 2 - Photos showing the current status of Rm 306 and Rm 308

The following works are proposed which require Listed Building Consent.

*Overboarding walls*



It is proposed to overboard all of the walls using 9mm plasterboard, fixed to existing walls with adhesive (not mechanical fixings). Skirting board will then be surface fixed to the overboarding. This will follow removal of all kitchen units in Rm. 305 and removal of the bath and shower in Rm. 308.

#### *Installation of data cabling*

New data cabling (surface fixed in mini trunking) is proposed, connected to new data points to each room, and connecting to an existing data cabinet housed within the building.

#### *Other works*

The following works are also proposed as part of the light touch refurbishment of Rm 305 and Rm 308. It was agreed in writing with the Conservation Officer at LB Camden on 29 January 2024 that these works do not require Listed Building Consent. They are listed out below to provide additional context and are not the subject of this application.

- Strip-out all fixtures and fittings back to bare walls and floors (including removal of floor finishes) making good as appropriate. The floor finishes are not historic, they are sheet vinyl laid over existing floorboards.
- Light touch redecoration of all ceilings, walls and internal joinery.
- Supply and fitting of new carpet tiling, including for all preparatory works as appropriate. The carpet will not be directly fixed to the fabric.

In addition, the proposed works as part of this application do not alter the access arrangements for the building.

#### **Planning Policy Considerations**

This section of the letter sets out the key planning and heritage considerations for the proposal. These are design, access and heritage.

Given the minor nature of these proposals which will not alter the use, size or energy efficiency of the building, sustainability policies are not relevant and have therefore not been assessed.

#### Relevant Planning Policy Documents

##### Adopted Development Plan Documents

- The London Plan (2021)
- Camden Local Plan (2017)

##### Material Considerations

The following documents are material considerations in the assessment of these proposals:

- National Planning Policy Framework (NPPF) (2023)
- Bloomsbury Conservation Area Appraisal and Management Strategy (2011)
- Camden Planning Guidance: Design (2019)



The London Borough of Camden has recently carried out a Regulation 18 consultation on a new Draft Local Plan which closed in March 2024. Given the early stage in the production of the new Local Plan, the draft Local Plan carries limited weight in the decision-making process in line with Paragraph 48 of the NPPF.

### Heritage

The relevant design and conservation policies are as follows:

*NPPF Section 16 Conserving and enhancing the historic environment* sets out the key planning tests for the protection of heritage. The NPPF emphasises the need for assessing the significance of heritage assets and their setting to fully understand the historic environment and inform suitable design proposals for change to significant buildings. In making decisions, Local Planning Authorities should consider the “*desirability of sustaining and enhancing the significance of heritage assets*” and a development’s “*positive contribution to local character and distinctiveness*”.

*Paragraph 208 of the NPPF* 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 Policy HC1 Heritage conservation and growth*: states that development proposals impacting heritage assets should be sensitive so as to preserve and enhance their significance, mitigating any potentially harmful effects.

*London Plan Policy D12 Fire Safety*: states that development proposals must achieve the highest standards of fire safety and be constructed in an appropriate way to minimise the risk of fire spread.

*Camden Local Plan Policy D1 Design*: seeks to ensure that development proposals meet the highest standards of design, sustainability, respect local context and character, and resist development that would cause harm to any listed building or Conservation Area. Building services equipment should be in a visually inconspicuous position.

*Camden Local Plan Policy D2 Heritage*: maintains the need to protect and preserve Camden’s heritage assets through developments of high-quality design that respect the local context and character. It recognises the need to consider the relative weight of public benefits when assessing development proposals which result in substantial harm to listed buildings. It states that the Council will resist any alterations or extensions which would cause harm to the special architectural and historic interest of a listed building.

*Camden Design SPD (2021)*: states that building services equipment should be incorporated into the host building aesthetically and not harm listed buildings and conservation areas.

*Draft Camden Local Plan (2024) Policy S3 Bloomsbury Campus Area*: supports the provision of attractive and stimulating learning spaces and prioritises enhancing and respecting heritage assets in the area.

*Draft Camden Local Plan (2024) Policy D5 Heritage*: states that the Council will resist any cumulative, incremental, changes to a designated heritage asset and where there is a concern the changes may impact on the significance of the building.

### *Applicant Response*





The site is located within the Bloomsbury Conservation Area and is Grade II listed. As such, UCL has carefully considered the design of the proposals to ensure it is minimal in scope and has limited impact on the Grade II listed building and Conservation Area. As the proposed works are internal only, there will be no impact on the character of the Conservation Area nor on the setting of neighbouring listed buildings.

The kitchen (Rm. 305) and bathroom (Rm. 308) are currently in a poor state of repair (as shown in Figure 2), with dated decoration and fixtures. This detracts from the significance of the building in its existing state. Updating the decoration and modernising the fixtures will help to enhance the significance of the rooms as part of the wider building.

The fixtures and fittings which are to be replaced and upgraded as part of the works are modern additions to the rooms and therefore have no significance in the context of the listed building. The proposed services will be surface mounted, ensuring they can be removed easily without damage to the original building fabric. Therefore, the proposed works will improve the appearance of the rooms and bring them in line with the high quality standard seen across the UCL estate.

Overall, the proposals will not result in any harm to the significance to the building. The light touch redecoration of the building enhances the significance of the building, preserves it for future use, and enables its continued use as university offices. Therefore, the proposed works comply with national, regional and local policy.

#### Access

The proposed works to 11 Woburn Square are minor and do not affect the access arrangements for the building.

#### **Application Submission**

In addition to this covering letter and policy assessment, this application comprises and is supported by the following documents:

Document Type	Prepared by
Application Forms and Certificates	Deloitte
Site Location Plan	Planning Portal
Floorplan	UCL Estates

We trust that you have all the information you need to validate the application. Should you have any queries or require any further information, then please do not hesitate to contact my colleague Emma Williams

[Redacted signature]

Yours sincerely

[Redacted signature]

Deloitte LLP