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Our ref: **LEO/PIR/BGI/U0024231**
Your Ref: **PP-12904778**

17 June 2024

Town and Country Planning Act 1990 (as amended)
Planning (Listed Buildings and Conservation Areas) Act 1990
49-51 Gordon Square, London, WC1H 0PD
Application for Listed Building Consent

We write on behalf of our client, University College London ('UCL') (the 'Applicant'), to submit an application for Listed Building Consent in respect of replacement fire alarm systems at 49-51 Gordon Square, London, WC1H 0PD ('the Site').

Listed Building Consent is sought for:

"Installation of replacement fire alarm system."

Site and Surroundings

The Site forms part of a terrace row and is located to the east of Gordon Square. The rear of the property backs on to Connaught Hall student halls residence.

The buildings comprise educational day nursery office uses and are occupied by the Deafness, Cognition and Language (DCAL) Research Centre, at 49 Gordon Square; the UCL Day Nursery and Global Engagement Office (GEO), both at 50 Gordon Square; and the UCL Institute of the Americas, at 51 Gordon Square.

The Site is Grade II listed. It is located under the following entry '*Numbers 47 to 53 and attached railings to areas and wall to number 45 Tavistock Square screen wall linking number 53 Gordon Square and number 45 Tavistock Square*' (ref. 1113034). It is located within the Bloomsbury Conservation Area and within a Protected Vista: Greenwich Park Wolfe statue to St Paul's Cathedral.

Surrounding buildings are predominantly educational and form part of the wider UCL Campus.

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The Site has a Public Transport Accessibility Level (PTAL) of 6b (Excellent). Russell Square and Euston underground, overground and railway stations are also within a short walking distance. There are also a number of bus routes serving the area.

Relevant Planning History

From a review of the Council's online planning register, we have provided a summary of the relevant planning applications relating to the Site.

On 08 August 1956, a planning application (ref. TP79478/08/06/56) was approved for the **"Use of basement, ground, first, second and third floors of No.49, Gordon Square, St. Pancras, for university purposes."**

On 01 December 1970, a listed building consent application (ref. HB230) was approved for the **"New door opening on the second floor between Nos 49 & 50 Gordon Square, Camden."**

On 07 August 1972, a listed building consent application (ref. HB419) was approved for the **"Internal alterations at 49-52, Gordon Square, W.C.1. including the formation of openings between numbers 49 and 50, and 51 and 52."**

On 06 June 1984, a listed building consent application (ref. 8470069) was approved for **"Internal alterations at second floor level to nos. 50 and 51 Gordon Square. (As shown on two unnumbered drawings)."**

On 20 October 1988, at 49-51 Gordon Square, a listed building consent application (ref. 8870135) was approved for the **"Internal alterations in the buildings as shown on drawings CA/1020-25."**

On 6 May 1999, at 49-51 Gordon Square, an application (ref. LS9904441) was submitted for the **"Partial demolition of works to include relocation of ground floor window, new ground floor toilets, third-fourth floor stair replaced, and formation of new openings, (plans submitted)."** This application was withdrawn, and no information remains on Camden's public portal.

On 08 February 2006, at 50-51 Gordon Square, a listed building consent application (ref. 2006/0417/L) was approved for **"Alterations to existing walls to create new/altered openings, and the removal of partitions and doors at basement level."**

On 19 May 2010, at 50-51 Gordon Square, a full planning and listed building consent application (refs. 2010/2296/P & 2010/2308/L) were refused for the **"Demolition of existing single storey rear extension and erection of a single storey rear extension to an existing university building (Class D1)."** And for **"Works associated with the demolition of existing single storey rear extension and erection of a single storey rear extension to an existing university building (Class D1)."**

On 08 June 2011, at 50-51 Gordon Square, a detail of conditions application (ref. 2011/2551/L) was approved for **"Details of roofing membrane material pursuant to condition 4 of listed building consent dated 19/04/11 (ref. 2011/2551/L) for work associated with the erection of a single storey rear extension at basement level following demolition of existing infill link to university building (Class D1)."**

On 23 February 2011, at 50-51 Gordon Square, a full planning and listed building consent application (refs. 2011/0912/P & 2011/0913/L) were approved for the **"Erection of a single storey rear extension at basement level following demolition of existing infill extension to university building (Class D1)."** And for **"Work**

associated with the erection of a single storey rear extension at basement level following demolition of existing infill link to university building (Class D1)."

On 12 June 2023, at 49 Gordon Square, a full planning and listed building consent application (refs. 2023/2269/P & 2023/2413/L) were approved for the **"Installation of 2 condenser units and associated timber screen in the rear courtyard, and replacement of 2 ventilation grilles on the rear elevation of the building."** And for the **"Installation of 2 condenser units and associated timber screen in the rear courtyard; replacement of 2 ventilation grilles on the rear elevation of the building and internal works including changes to partitions, installation of heat recovery unit and AC units and associated works, overhaul of sash windows, new WC sanitaryware and associated works, removal and replacement of existing suspended ceilings, flooring, lighting, and other internal related refurbishment and redecoration works."**

From a review of the planning history, the Site has a relatively extensive background of works, including a significant amount of approved listed building consent applications for various internal works.

Proposals

The proposed works seek to replace and upgrade the existing fire alarm systems at 49-51 Gordon Square. The current systems are in poor condition and not functioning efficiently to meet modern standards and the needs of occupiers. In order to install the new systems, internal works are proposed to all floors of the buildings.

The new fire alarm systems will comprise a range of fixtures which will either be ceiling or wall mounted. Central to the new systems are the new smoke detectors which are required to be ceiling mounted and located within a centralised position in each room to maximise their effectiveness. As the buildings have been subject to various internal changes over the years, many of the rooms have modern or plain finishes. However, decorative elements still remain, and these can largely be found to the ceilings of the rooms to the front of the buildings and circulation spaces.

Where moulded ceilings exist, the smoke detectors have been sensitively located and every effort has been made to replace ceiling fixtures on a like for like basis. Where this has not been possible, the location of the smoke detectors has been guided by the position of existing ceiling mounted fixtures, for example, track lighting and wi-fi points. This approach has been taken to consolidate modern ceiling fixtures to limit their visual impact and avoid further disrupting and cluttering the decorative ceilings.

As well as the ceiling mounted smoke detectors, the system is required to be supported by a number of other wall mounted fixtures including call points, door releases and fused connection units. These will replace existing fixtures wherever possible, and the number of fixtures will be rationalised when compared to the existing systems.

In terms of cabling, this is proposed to be installed within suspended ceilings or clipped to floor joists. Where visible, the cabling is proposed to be surface mounted in mini trunking and clipped to walls and ceilings. This would require minimal intervention to the listed fabric.

Minor external works in the form of cabling and fire alarm beacons are also proposed. It has previously been agreed with the case officer that these works are de minimis and therefore planning permission is not required.

Planning Policy Context

Section 38(6) of the Planning & Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the Development Plan unless material considerations indicated otherwise.

The London Borough of Camden's Local Development Framework comprises The London Plan (2021), and the Camden Local Plan (2017).

Whilst not forming part of the Statutory Development Plan, the following documents remain important material considerations:

- National Planning Policy Framework ('NPPF') (Dec 2023);
- National Planning Practice Guidance (as amended); and
- London Borough of Camden's Supplementary Planning Documents.

Camden Council is currently in the process of drafting a new local plan and consulted on the and has recently consulted on this as part of the statutory Regulation 18 process (17 January to 13 March 2024). At this early stage, the draft policies hold no weight and therefore they have not been considered here.

Legislative Framework

Statute regarding the heritage environment is relevant to this application. Both the site's historic fabric and the surrounding environment have been carefully considered in the development of the proposals having regard for the statutory legislation set out below.

Section 16 of Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant listed building consent, special regard shall be paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72 of the same Act states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

National Planning Policy Framework

Under paragraph 200 of the NPPF, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including the contribution made by their setting.

Paragraph 203 states that in determining planning applications, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
- The desirability of new development making a positive contribution to local character and distinctiveness.

Under paragraph 208, it states that where a development proposal will lead to a 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 securing its optimum viable use.

Planning Assessment

Design and Heritage

Camden Local Plan Policy D1 seeks to ensure development respects local context and character, preserves or enhances the historic environment and heritage assets; is of sustainable and durable construction; is adaptable to different activities and land uses; comprises details and materials that are of high quality and complement the local character; and is inclusive and accessible to all.

Camden Local Plan Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, especially the conservation areas and listed buildings. In relation to listed buildings, the policy states that the Council will also resist development that would cause harm to the significance of a listed building through an effect on its setting or would cause harm to its special architectural and historical interest.

The general purpose of the proposal is to provide improved fire alarm systems to protect students, staff and the heritage assets from fire risk. The current systems are in poor condition and not functioning efficiently to meet modern standards and the needs of the occupiers.

When developing the proposals for the fire alarm systems, careful consideration has been given to the significance of the heritage assets, and how such proposals will impact on these.

From a review of the Site, and consideration given in the supporting Heritage Statement, it is considered that some significance can be attributed to the areas where works are proposed, principally the moulded ceilings.

As demonstrated in the proposal section, and associated supporting documentation, every effort will be made to make sure that the visual impact of the new fire alarm systems is minimised. Wherever possible, the locations of existing fixtures are proposed to be reused and overall, the number of fixtures throughout the buildings will be rationalised. Where smoke detectors are to be installed in rooms with moulded ceilings, these will be sensitively located in order to avoid disrupting and cluttering the ceilings.

Given the main works are internal, and given the de minimis nature of the external works, these will not have an adverse impact on the character or appearance of the conservation area.

To assess the impact of the proposals on the significance of the listed buildings, a Heritage Assessment has been prepared by Gerald Eve and submitted alongside this application and cover letter.

Overall, the proposed works would preserve the significance of the listed building. The works are considered to be in accordance with the Local Plan Policies D1 and D2, as well as relevant national policy relating to the historic environment. Furthermore, the applications would satisfy the statutory provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Enhancing Community Facilities

Camden Local Plan Policy C2 states that Camden will support the investment plans of educational, health, scientific and research bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK.

The proposed works seek to provide safe teaching and working spaces for students and staff of the University. The proposed works will support and enhance the existing educational use and therefore complies with Local Plan Policy C2.

Conclusion

The proposed development would secure fire safety improvements to the benefit of current and future students and staff. As the fire alarm systems are replacements of the existing, the location of existing fixtures are proposed to be reused wherever possible. Whilst the works would involve the addition of new fixtures to the moulded ceilings, these have been sensitively located in order to minimise their visual impact and no fixings are proposed to be mouldings. Overall, the works would result in the rationalisation of fixtures throughout the buildings.

The proposed works therefore comply with relevant policies of the Camden Local Plan, namely Policies D1, D2 and C2. Furthermore, the works would accord with the Planning (Listed Buildings and Conservation Areas) Act 1990 and Section 16 of the NPPF.

Application Documentation

As part of the submission of the application on the Planning Portal, we enclose the following documents:

- Application Form, prepared by Gerald Eve;
- Cover Letter, prepared by Gerald Eve;
- Heritage Statement, prepared by Gerald Eve;
- Design and Access Statement, prepared by Gerald Eve;
- Site Location Plan, prepared by Fowler Martin; and
- Fire Alarm Upgrade report, including drawings, prepared by Fowler Martin.

Should you have any questions, please do not hesitate to contact Paige Ireland [REDACTED] or Ben Gibbs [REDACTED] of this office. We look forward to hearing from you.

Yours faithfully,

[REDACTED]

Gerald Eve LLP