

LB Camden
Planning and Building Development
5 Pancras Square, London
N1C 4AG

10th September 2024

CP2023/41
BY PLANNING PORTAL

Dear Sirs,

FULL PLANNING AND LISTED BUILDING CONSENT APPLICATION

LOWER GROUND AND GROUND FLOORS, 39 MARCHMONT STREET, LONDON, WC1N 1AP

I am instructed by my client, FGC Freehold Limited (“**the Applicant**”) to submit a full planning and listed building consent applications in relation to 39 Marchmont Street (“**the Site**”) for the following development (“**the Proposed Development**”):

“Repairs and refurbishment of the commercial unit, including reinstatement of the front lightwell and associated openings at lower ground level together with the installation of a staircase and railings, replacement of the shopfront, removal of the plastic roof to the rear courtyard, replacement of the roofs to the rear ground floor extensions and internal alterations at ground and lower ground floor level.”

Accordingly, I enclose the following information:

- Completed full planning and listed building application forms with completed Certificate A;
- CIL Questions Form;
- Structural Report (“**SR**”) prepared by Banfield Wood LLP;
- Heritage Statement (“**HS**”) prepared by John Lowe Heritage;
- Design and Access Statement (“**DAS**”) prepared by MDLR Architects;
- Existing and proposed drawings prepared by MDLR Architects:
 - Existing Location and Block Plans – 24002-MA-PL1-XX-DR-A-001 P03;
 - Existing Floor Plans – 24002-MA-PL1-ZZ-DR-A-010 P04;
 - Existing Elevations – 24002-MA-PL1-XX-DR-A-070 P03;
 - Existing Sections – 24002-MA-PL1-XX-DR-A-040 P04;
 - Demolition Floor Plans – 24002-MA-PL1-ZZ-DR-A-020 P04;
 - Demolition Elevations – 24002-MA-PL1-XX-DR-A-080 P03;
 - Demolition Sections – 24002-MA-PL1-XX-DR-A-050 P04;
 - Proposed Floor Plans – 24002-MA-PL1-XX-DR-A-110 P06;
 - Proposed Front Elevation – 24002-MA-PL1-XX-DR-A-170 P03;
 - Proposed Rear Elevation – 24002-MA-PL1-XX-DR-A-171 P04;
 - Proposed Sections – 24002-MA-PL1-XX-DR-A-140 P04;
 - Proposed Basement Front Door Details – 24002-MA-PL1-ZZ-DR-A-400 P02;

- Proposed Basement Front Window Details – 24002-MA-PL1-ZZ-DR-A-401 P02; and
- Proposed Basement Rear Patio Door Details – 24002-MA-PL1-ZZ-DR-A-402 P02.

I can also confirm that a fee for processing these applications in the amount of £293 will be paid via Planning Portal.

a. Site and Surrounding Area

The Site is located on the western side of Marchmont Street, opposite Brunswick Centre and just north of the junction with Coram Street. It consists of a Grade II listed mid-terrace early 19th century five storey building with commercial lower ground and ground floors and residential above. For clarification, this application relates to commercial unit only.

Internally, the ground floor has been altered over the years from its historic layout, as set out in paragraph 22 of the Heritage Statement. It consists of a separate entrance to the upper floors and a commercial unit with a separate entrance at the front. The commercial unit consists of an open plan layout with doors to a store, stairs to a mezzanine storage, a staircase to the lower ground floor and a courtyard at the rear. There is a small toilet accessed from the courtyard. At the lower ground floor level, the area consists of further commercial floorspace. Overall, as described in the accompanying Structural Report, the premises are in a very poor state of repair and require significant refurbishment to be appropriate for any modern occupiers.

Externally, the original shopfront has also been lost, as confirmed in paragraph 23 of the HS. It now consists of a modern, fully glazed door flanked by full height glazed sections. A timber-panelled door with a fanlight above provides separate access to the upper floors. At the rear, part of the courtyard is covered by a failing plastic sheeted roof. The roofs on the small store area and single storey rear extension are both in a very poor state of repair, resulting in ongoing water damage.

In terms of the surrounding area, bordering Site to the north is a similar building at 41 Marchmont Street. Bordering Site to the south is a modern building at 33-37 Marchmont Street. The Site forms part of a Grade II listed terrace of similar properties at 39-73 Marchmont Street (“**the Terrace**”). All properties in the Terrace form part of a designated Marchmont Street/Leigh Street neighbourhood centre. Most of the properties within the Terrace also benefit from the lightwell at the front and with safe access to the lower ground floor to the street (see below). This is discussed in further detail in the *Planning History* section of this letter.

Figure 1. Existing front lightwells with stairs along the Marchmont Street frontage of the buildings in the Terrace with the Site visible on the far right (Google Streetview).



The Site together with the wider surrounding area forms part of Bloomsbury Conservation Area (“**the BCA**”). Detailed description and assessment of the significance of the BCA is provided in the accompanying Heritage Statement in paragraphs 11-16 and 38-40 accordingly.

b. Planning History

Having reviewed the London Borough of Camden online planning register, this section first sets out the planning history of the Site, followed by other relevant applications in the borough.

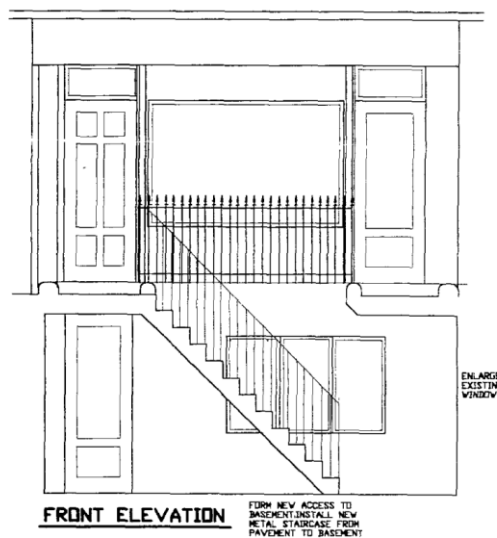
The Site

On 7th August 1989, the planning application (LPA ref: PL/8900186) was refused for change of use of ground floor from retail to restaurant/take away. More recently, a listed building consent (LPA ref: 2013/1626/L) was granted for the installation of a commemorative blue plaque to Charles Fort.

Other relevant applications

On 19th October 1998, planning permission (LPA ref: PS9804164R2) was granted for internal and external works for the creation of a two storey rear extension together with the formation of an access to the basement including the erection of new railings for continued A1 use at 49 Marchmont Street. The works were not considered to result in any harm to the Grade II listed building.

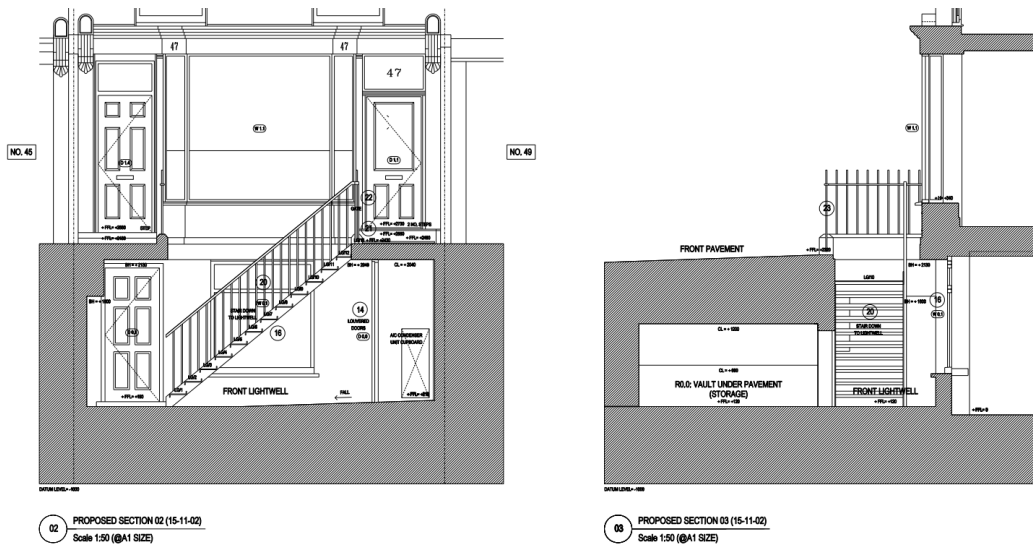
Figure 2. Approved front elevation with new railings in the front lightwell at 49 Marchmont Street (LBC).



On 6th August 2004, a planning application (LPA ref: PSX0204939/P) was granted for the change of use of the basement from ancillary retail use (Class A1) to a self-contained residential unit including the formation of a new lightwell, installation of a metal staircase and railings to the front at the neighbouring 41 Marchmont Street. The opening up of the lightwell, similar to the Proposed Development, was considered entirely acceptable by the Council.

More recently, on 26th January 2016, a planning application (LPA ref: 2015/6619/P) and a listed building consent (LPA ref: 2015/6802/L) were granted for the 'change of use of part of the lower ground floor from B1 to A3 to provide additional storage to ground floor restaurant, replacement of rear lower ground floor extension, installation of a new door at lower ground floor and new front staircase' at 47 Marchmont Street. These works were not considered to cause harm to the building's appearance, character or special interest.

Figure 3. Front elevation and section through the proposed front lightwell with new stairs and doors at 47 Marchmont Street (LBC).



With all the above in mind, it is evident that opening up of the front lightwells and provision of associated stairs and openings has been considered entirely acceptable in this Terrace and BCA.

c. Planning Policy

The development plan for the Site consists of the following documents:

- London Plan (“LP”) (2021);
- Camden Local Plan (“CLP”) (2017).

Other documents relevant to the determination of this application include:

- Design CPG (2021); and
- Bloomsbury Conservation Area Appraisal and Management Strategy (“BCAAMS”) (2011).

The emerging LB Camden Draft Local Plan is in the early stages and therefore, holds very little weight in determining any applications.

d. Proposed Development

This application seeks permission for repairs and refurbishment of the existing commercial unit. The detailed list of works is set out in the accompanying Design & Access Statement and shown on the drawings.

In summary, the works will include the reinstatement of the front lightwell together with the installation of a door and window into the lightwell at the lower ground level. A new, safe escape will be provided from the lower ground floor level directly to the street by the installation of a metal staircase and black metal railings at ground level. The existing modern shopfront will be replaced with a more traditional design with repair and restoration of the remaining historic elements.

At the rear, the failing courtyard roof cover will be removed and roofs to the ground floor extensions replaced. Internally, the mezzanine storage will be removed and floor levels rationalised at the rear to allow for toilet facilities accessed from within the unit and improved internal access to the lower ground floor. Modern partitions will be removed at the lower ground floor level to improve the quality of the commercial premises. Finally, the unit will be damp-proofed throughout.

e. Planning Considerations

When considering the Proposed Development, the key planning considerations are:

- Design; and
- Impact on the heritage assets.

I have discussed each in turn below.

Design

Policy D1 of the CLP seeks to secure high quality design in development, including respecting the local context and character, improving movement through the site and ensuring accessibility. In response, the Proposed Development has been carefully designed to reflect the period of the building, its character and the surrounding streetscene.

In terms of the lightwell, as set out in the *Site and Surrounding Area* section of this letter, the lightwells form part of the prevailing character of this part of Marchmont Street and BCA. Opening up of the lightwell and installation of the railings will reflect the appearance of buildings in the Terrace and ensure continuity within the streetscene. The proposed window and door at ground level will have a traditional design and will be made of timber painted to match the openings on the upper floors. The proposed staircase will be painted black to match the railings and other lightwells in the street. The proposed design will ensure compliance with current Building Regulations.

The replacement roof at the first floor level will have a similar appearance to the existing. The replacement of the pitched roof with a flat roof in the store room will not result in an overall increase in the height or scale of the extension. It will retain a similar appearance as existing, whilst safeguarding the built fabric of the building from further water ingress. The door to the courtyard will be replaced with a white painted timber door, similar to other openings in the building.

In terms of shopfronts, Policy D3 of the CLP states that the Council will expect a high standard of design in new and altered shopfronts. Therefore, the proposed replacement shopfront will have a traditional design, similar to those in the neighbouring Terrace. This will include the re-introduction of traditional stall risers and glazed panels above in line with the residential entrance. The shopfront will be made of timber as existing. The level access will be retained to ensure accessibility.

With all the above in mind, it is considered that the Proposed Development will ensure high quality design and will accord with Policies D1 and D3 of the Camden Local Plan.

Impact on heritage assets

Policy D2 of the CLP seeks to preserve and, where appropriate, enhance the Borough's heritage assets and their settings. 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. In addition, paragraph 7.62 of the CLP states that proposals that reduce the energy consumption of listed buildings (for instance roof insulation, draught proofing, glazing) will be welcomed provided that they do not cause harm to the special architectural and historic interest of the building or group.

In response, this submission is accompanied by Heritage Assessment. Pages 14-18 of the HS describe the significance of the building. As set out in paragraph 29, the frontage of the building remains an important part of the Terraces' composition and contributes to the wider townscape. Whilst, paragraph 30 of the HS concludes that the quality of the rear elevation is poor and detracts from the building's architectural interest.

Following pages 21-23 of the HS provide an assessment of the impact of the Proposed Development on the building and surrounding Conservation Area. In terms of external works, as concluded in paragraphs 45-46 of the HS, the proposed replacement of the shopfront and reinstatement of the

lightwell would be a positive change to the building's principal feature and greatly enhance the building's significance and its contribution to the BCA. The removal of the roof to the courtyard and replacement of the two existing modern roofs at the rear would also result in the improvement to the appearance of the building. Whilst a very small amount of historic fabric would be removed when replacing the existing door to the rear courtyard, as concluded in paragraph 52 of the HS, it would result in only a minor impact which overall would be easily outweighed by the significant benefits of the scheme.

Turning to the internal works, the proposed internal alterations, including the removal of all non-original partitions and staircases at lower ground and ground floors would result in enhancement due to the return of some legibility to the lower ground floor's historic plan form and preservation of otherwise historic fabric and significance of this Grade II listed building. Finally, the proposed cavity membrane system for damp-proofing will ensure the longevity of the building and can be affixed without significant disruption of the historic fabric.

As such, it is considered that the Proposed Development will not only preserve but significantly enhance the appearance of this listed building and its contribution to the character and appearance of the BCA. Therefore, it will accord with Policy D2 of the CLP.

f. Conclusions

In summary, the Proposed Development seeks to repair and refurbish the existing commercial unit to ensure it is fit for the modern needs of commercial occupiers. The proposed external and internal works would not only preserve but significantly enhance this listed building and its contribution to the streetscene and wider Bloomsbury Conservation Area. As such, the application should be approved.

I trust this submission provides you with all the necessary information to register and validate the application. If you do require any additional information, then please do not hesitate to contact me.

Yours faithfully,

Viktorija Saveca
Associate

cc. FGC Freehold Limited

Encl.