

OG/17-00258

8 September 2021

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Dear Nick,

Re: Application for Listed Building Consent for the replacement of a metal gas pipe on the lower ground floor at 47 Mecklenburgh Square

I write on behalf of my client Goodenough College in relation to the above site, to submit an application for, Listed Building Consent for minor alterations are required to replace a corroded gas-pipe.

The application seeks Listed Building Consent for:

Replacement of a metal gas pipe on the lower ground floor

The proposed works are detailed further within the following documents, enclosed with this letter:

- A sketch plan illustrating the route of the proposed pipe;
- Pre-Application response email;
- Figure 1 Photograph of external lightwell to the side of House 47;
- Figure 2 Photograph of internal basement flat route;
- Figure 3 Photograph of lightwell at the front of House 47.

Site and Surrounding Area

47 Mecklenburgh Square is Grade II and was first listed on 20th May 1969. The listing description is as follows:

TQ3082SE MECKLENBURGH SQUARE 798-1/96/1113 (North side) 20/05/69 Nos.43-47 (Consecutive) and attached railings GV II

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5 terraced houses, being the remains of a terrace forming the north side of Mecklenburgh Square. c1824-5. By Joseph Kay. Built by T Weeding except No.43, Woolcot & Browning and No.47, S Wright. Yellow stock brick with later patching and rusticated stucco ground floors. 4 storeys and basements. 3 windows each. Roundarched doorways with reeded surrounds, patterned fanlights and double panelled doors. Gauged brick flat arches to recessed sashes; 1st floor with continuous balconies. Continuous stucco cornice at 3rd floor level and stucco coping to parapets. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas. (Survey of London: Vol. XXIV, King's Cross Neighbourhood (St Pancras part IV): London: -1952: 47-50).

No. 47 forms the end building of the grand terrace of properties facing onto Mecklenburgh Square. The property has four storeys, and a basement, with a pitched roof, hidden from view at street level by a front parapet.

The listing of the building relates to its external qualities, and confirms that the interiors were not inspected at the time of listing to ascertain the significance of any internal features. The building has been refurbished over the years to adapt to the changing requirements of its residential occupiers and to ensure its proper upkeep. Most recently, listed building consent was granted in both 2017 and 2019 for repairs to the first floor balcony (ref: 2017/4838/L, and 2019/0832/L, respectively). It should be noted that these works related to the repair of a highly prominent feature of the building, and as such the implications of the work were far greater than the minor changes currently proposed.

Surrounding Area

The site is located within Bloomsbury Conservation Area, which covers an area of approximately 160 hectares extending from Euston Road in the north to High Holborn and Lincoln's Inn Fields in the south and from Tottenham Court Road in the west to King's Cross Road in the east.

The initial designation of Bloomsbury as a conservation area in 1968, sought to protect elements of development from the Georgian and earlier eras but excluded areas where there had been significant later redevelopment. There have been numerous subsequent extensions that have mostly reflected a growing appreciation of Victorian and Edwardian and high-quality 20th century architecture.

The site is located within Sub-Area 12 – Coram's Fields / Brunswick Gardens, which is dominated by large-scale, green open spaces of historic significance in and around Coram's Fields. The spaces provide a sense of openness which contrasts with surrounding areas. There is a predominance of institutional (hospital, university, education), recreational and community uses with secondary residential, and office uses. The remaining fragments of the townhouses developed on the Foundling and surrounding estates in the late 18th and early 19th centuries are mostly protected by listing.

In terms of the built form, the Georgian townhouses in the sub area form homogeneous terraces and tend to be listed. Some terraces have an overall classical composition giving them a greater sense of scale and presence; including the buildings on the east side of Mecklenburgh Square. The overall height and articulation of the facades, visually supported by front boundary railings provide a sense of enclosure and overall unity in this area.

Relevant Planning History

The Council's online planning records have been assessed and summarised as follows:

• 2019/0832/L – 47 Mecklenburgh Square WC1 – Repair and restoration of the first floor balcony as shown on drawing number 17023-CBP-00-XX-DR-A-0001. Grant Listed Building Consent 29.03.2019

- 2017/4838/L 47 Mecklenburgh Square WC1 Repair of first floor balcony as shown on drawing numbers 17023-CBP-XX-XX-DR-A-4001-P04. Grant Listed Building Consent: 13.02.2018
- 8770323 Rear of 47 Mecklenburgh Square WC1 Demolition of existing rear extension and the erection of a five storey building over basement connected to 47 Mecklenburgh Square to provide 14 student flats as shown on drawing numbers 8625/4B 6B 7A 9A 10B 11B & 124/P2 revised by undated letter received on 10th March 1988 and letter dated 22nd August 1988. Grant Listed building or conservation area consent: 03.09.1987
- 8703533 Rear of 47 Mecklenburgh Square WC1 The erection of a five storey building over basement to provide four 1-bedroom and ten 2-bedroom students flats as shown on drawing numbers 8625/4B 6B 7A 9A 10B 11B & 124/P2 revised by undated letter received on 10th March 1988 and letter dated 22nd August 1988. Granted with conditions: 03.09.1987
- 8570011 47 Mecklenburgh Square Works of replanning of the existing five flats. As illustrated in drawing nos: 113/WGH/7/4; 8/4; 9/2; 29/3; 63; 201; 202; 203 & 204 . Grant Listed Building Consent: 10.01.1985
- 8470339 47 Mecklenburgh Square Demolition of the existing basement partground and part-first floor rear extension. ^As illustrated in drawing nos: 113/WGH/7/4 8/4 9/2 & 29/3. Planning Permission refused: 10.01.1985
- 8402153 Rear of Mecklenburgh Square Redevelopment of the site at the rear by the erection of a building containing 3 flats. ^As illustrated in drawing no: 113/WGH/100. Refuse planning permission 10.01.1985
- HB1228 43–47 Mecklenburgh Square Internal alterations to 43-47 Mecklenburgh Square to Comply with means of escape regulations. Conditional 24.09.1975
- M15/C/22084 43-47 Mecklenburgh Square The use for a limited period of the land at the rear of 43-47 Mecklenburgh Square, St. Pancras, as a private oar park.Conditional 16.01.1963.

Proposed Works

The proposal seeks to replace the existing pipework to the building which is corroded and needs to be replaced on health and safety grounds. As such, it is proposed to run a new pipe of approximately 11.5cm diameter through the western elevation of the building into the front room at lower ground floor level. The pipe will follow the lines of the existing central heating pipework, and exit the building on the southern elevation. It will then follow the line of the bottom step, and the side of the steps, within the lightwell and exit the site to the south.

For full details of the proposal, please refer to the enclosures listed above.

Planning Policy Context

The statutory development plan consists of:

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

National Planning Policy advice in relation to the historic environment is contained within Chapter 16 of the National Planning Policy Framework (February 2019 as amended July 2021).

The NPPF states in Paragraph 194 that:

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Annex 2 of the NPPF defines Heritage Assets as: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

The Planning (Listed Building and Conservations Areas) Act 1990 provides protection for buildings of special architectural or historic interest. The Act directs that listed building consent is required to demolish, alter or extend a listed building in a way that affects its character or appearance as a building of special architectural or historic interest.

Policy HC1 – Heritage conservation and growth – of The London Plan 2021, adopted March 2021 seeks development proposals affecting heritage assets should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

Policy D2 – Heritage – of the Camden Local Plan, adopted July 2017 seeks to preserve and enhance Camden's rich and diverse heritage assets and their settings unless it can be demonstrated that the substantial harm or loss is necessary to achieve public benefits that outweigh harm or loss.

Heritage Assessment

The proposed works are modest, pertaining to a corroded metal gas pipe running along the retaining wall of a light well at the side of the house and into the vault in the front light well of which this proposal seeks to replace. This proposal seeks to replace the pipe, which is no longer suitable, which is doing so will ensure that the historic character of this Grade II listed building is preserved and strengthened, with very limited impact on the historic fabric of the asset.

From the public domain the pipe will not be visible, as it is attached to the western retaining wall which will not harm the historic fabric of the building. At the front of the property the pipe will be on the lower ground floor and painted to match the wall, so it will not be prominent.

Internally a short length of the pipe will be visible inside the basement in the front right-hand corner, the room is of low significance and will result in no loss of historic fabric.

The proposal will benefit the heritage asset by preserving the architectural and historic interest of the building, preventing further deterioration. It is therefore considered that the proposal will accord with the provisions of NPPF, Policy HC1 of The London Plan 2021 and Policy D2 of the Camden Local Plan.

Pre-Application and Site Visit

A Pre-Application request was submitted to Camden Council on the 28th May 2021 in order to establish whether Listed Building Consent was necessary for the works. Following this a site visit was conducted with Nick Baxter (Conservation Officer) on Wednesday 27th July 2021, in which also encompassed two other sites within Goodenough College. During the course of the site visit it was confirmed that Listed Building Consent would be necessary.

The pre-application advice from Nick Baxter was sent via email on the 2^{nd of} September 2021 and has been included within the submission. Within the email the following advice was given:

"The site is a grade-II-listed end-of-terrace townhouse of 1824 making a positive contribution to the Bloomsbury Conservation Area. A site visit was carried out on 28/7, which also encompassed two other sites.

It is proposed to upgrade a large metal gas pipe running along the retaining wall of a light well at the side of the house and into the vault in the front light well. The two light wells are separated at the corner by a piece of land not owned by the applicant. The owner is unwilling to allow the pipe to cross his land, so the applicant needs to run a short length through the basement front room of the house itself. The pipe will pass through the side wall at approximately waist height, descend to floor level, then pass through the front wall, attached to the side wall of the area steps and entering a non-original vault door, whence it will join the supply.

It is assumed that the works are necessary and that no alternative route is possible for the pipe.

Externally, the pipe will not be visible, being attached to the retaining wall, and will not harm historic fabric. At the front, it will be at low level and painted to match the wall, so will not be prominent. The non-original concrete step may be extended to cover it.

Internally, a modest degree of loss of historic fabric will occur. A short length of the pipe will be visible inside the basement in the corner. However, this room is of low significance and the harm will be minor. It is suggested that boxing the pipe in will make a more substantial feature of it than leaving it unboxed. Leaving it unboxed also allows it to be understood for what it is, rather than mistaken for an original structure. That said, boxing it in would be acceptable."

On this basis we consider that Listed Building Consent should be granted due to the fact that the preapplication response expresses that the works are a necessity. Therefore should have no harm externally and a minimal amount internally in a room of low significance and therefore in our opinion an acceptable proposal.

Within the site visit it was agreed with Nick that the pipe should be painted externally to camouflage with the existing building and that the step at the bottom of the stairs could be extended for health and safety reasons to encompass the pipe.

Conclusions

The proposed replacement of a metal gas pipe will preserve and enhance the longevity of the building. It is considered that the proposed works will not have a negative effect on the specific historic character or architectural interest of the listed building, the proposals are minor and will not have no harm on the heritage interests of the Bloomsbury Conservation Area. The proposed works will positively enhance and maintain the longevity of the existing fabric of the building. Therefore, the proposal will comply with the provisions of the NPPF, Policy HC1 of The London Plan 2021 and Policy D2 of the Camden Local Plan.

I trust this meets the requirements to enable successful validation of the application and I look forward to hearing from you shortly with confirmation of the registration. However, should you have any questions, please do not hesitate to contact me.

Yours sincerely,

Olivia Glenn (Sep 17, 2021 09:32 GMT+1)

Olivia Glenn

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