

# ECE Planning

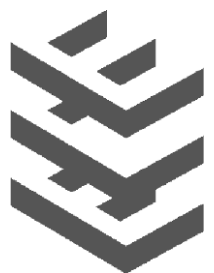
Statement of Common Ground

Section 20 of the Listed Buildings Act 1990

Listed Building Appeal

48 Mornington Terrace, Camden, London  
NW17RT

June 2022



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## STATEMENT OF COMMON GROUND

This Statement is agreed between

London Borough of Camden

And

ECE Planning Ltd.

## AS WITNESS the hands of the parties

Client                      London Borough of Camden

ECE Group Ltd

Acting by                      Elizabeth Beaumont  
(client representative name)

Sarah Hufford  
(ECE representative name)



Signed                      \_\_\_\_\_

For and on behalf of ECE Group Ltd

Dated: .....29/06/2022.....27/06/2022.....

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Project Name: 48 Mornington Terrace

Location 48 Mornington Terrace, Camden, London NW1 7RT

Client: Mr Luke Chandresinghe

File Reference: P1742i

Issue	Date	Author	Checked	Notes
PL1	01/10/2021	K Tipper	C Barker	Initial Draft
PL2	05/10/2021	K Tipper	C Barker	Client Issue
PL3	12/10/2021	K Tipper	C Barker	Appeal Issues
PL4	28/06/2022	S Hufford	C Barker	Signed Issue
PL5	29/06/2022	S Hufford	C Barker	Final Signed Issue

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## 1. Introduction

- 1.1. This **Draft Statement of Common Ground** has been produced by ECE Planning on behalf Mr Luke Chandresinghe (the Appellant) in support of a Listed Building Appeal against the refusal of London Borough of Camden Council to grant Listed Building Consent for the following works retrospectively:

*“Removal and installation of replacement sash windows and drainage pipe (front elevation); alterations to internal walls and plan form; new/replacement shutters, flooring, ceiling, and fireplaces and surrounds; replacement staircase; alteration to front lower ground steps; rendering of vault; alterations to joinery; removal of rear wall and erection of fully glazed full width rear extension and glass roof to rear return (retrospective)”.*

- 1.2. The purpose of the Draft Statement of Common Ground is to identify those areas that are considered not to be in dispute between the Appellant and the Council, as well as those matters that are considered to continue to be in dispute. This document will be added to and updated as discussions take place with the local authority.

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## 2. Background

### 2.1. Description of Development

- 2.1.1. The Appeal has been submitted by the Appellant against the refusal by the Council to grant Listed Building Consent for the following proposed development:

*“Removal and installation of replacement sash windows and drainage pipe (front elevation); alterations to internal walls and plan form; new/replacement shutters, flooring, ceiling, and fireplaces and surrounds; replacement staircase; alteration to front lower ground steps; rendering of vault; alterations to joinery; removal of rear wall and erection of fully glazed full width rear extension and glass roof to rear return (retrospective)”.*

- 2.1.2. The Council reference used throughout the determination of the application was 2020/5037/L.

### 2.2. Description of Site

- 2.2.1. The original application was supported by a Heritage Statement and Schedule of Works which provided a detailed analysis of the Site and the immediacy together with works undertaken. This Section seeks to reaffirm the detailed analysis and provide an update with regards to the current use of the site.

- 2.3. The site is located at 48 Mornington Terrace NW1 7RT and comprises a terraced grade II listed building with basement and 4 storeys above. The site is located on the east side of Mornington Terrace, and within the Camden Town Conservation Area.

### 2.4. Planning History

- 2.4.1. A detailed assessment of the planning history relevant to the Appeal site is provided within Section 4 to the Appellant's Statement of Case.

### 2.5. The Development Plan

- 2.5.1. A key role of the planning system is to regulate the development and use of land in the public interest. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that in making any determination under the Planning Acts the determination should be made in accordance with the Development Plan unless material considerations indicate otherwise. In this case the Development Plan for the area consists of the following:

- *London Borough of Camden Local Plan which was adopted on 3 July 2017*
- *London Plan*

- 2.5.2. In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

### 2.6. Application Documents

- 2.6.1. Those documents that were submitted to the Council, and which were considered and determined by the Council are identified within the Document List that accompanies this Appeal.

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## 3. Matters Agreed

### 3.1. Introduction

- 3.1.1. The following represent those matters that the Appellant believes to be agreed with the Council. These matters have derived from those discussions with the Council over the past 7 years, enforcement history, and the Officer's Reports.

### 3.2. Development Description

- 3.2.1. The description of the proposed as stated in the decision notice is as follows:

*"Removal and installation of replacement sash windows and drainage pipe (front elevation); alterations to internal walls and plan form; new/replacement shutters, flooring, ceiling, and fireplaces and surrounds; replacement staircase; alteration to front lower ground steps; rendering of vault; alterations to joinery; removal of rear wall and erection of fully glazed full width rear extension and glass roof to rear return (retrospective)".*

### 3.3. Agreed Matters

- 3.3.1. The following matters represent those matters that the Appellant believes to be agreed with the Council:

- The Property is Grade II listed. Numbers 26-52 Mornington Terrace and Attached Railings (which include the Property) were designated Grade II on 14 May 1974.
- The Property falls within the Camden Town Conservation Area.

## 4. Matters in Dispute

- 4.1.1. The following represents those matters that are currently subject to dispute between the Appellant and the Council. These matters have been derived from discussions with the Council over the past 7 years, enforcement history, and the Officer's Reports:

- Whether the works undertaken (set out within the refused listed building consent application) are harmful to the heritage asset.

## 5. Conclusions

- 5.1. The above seeks to identify those matters in the determination of this Appeal that are agreed as common ground between the Appellant and the Council ahead of the requested Hearing. This document will be added to and updated as discussions take place with the local authority.