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London Borough of Camden
Planning Services
5 Pancras Square
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16 December 2022

Our ref: LO/SNE/PIR/AME/U0021501

Your ref: PP-11749305

Dear Sir/Madam,

**Molecular Cell Biology Building, Andrew Huxley Building and 16-25 Gordon Square, London
Town and Country Planning Act 1990 (as amended)
Application for Full Planning Permission and Listed Building Consent
Planning, Design and Heritage Statement**

On behalf of our client, University College London, we write to submit an application for Full Planning and Listed Building Consent for works to facilitate the connection of the Molecular Cell Biology Building, 16-25 Gordon Square and Andrew Huxley Building to the Gower Street District Heat and Power Network. Full Planning Permission is sought for:

“The creation of a trench, and installation of new and replacement pipework to facilitate the connection of 17-25 Gordon Square and the Molecular Cell Biology Building to the Gower Street District Heat and Power Network, and associated external alterations.”

Listed Building Consent is sought for works to 16-25 Gordon Square:

“Internal and external alterations associated with the connection of the properties to the Gower Street District Heat and Power network including the installation of new internal and external pipework, removal of boilers and replacement with plate heat exchangers within the plantrooms of 17, 20 and 25 Gordon Square and the removal of external flues and other fixtures associated with the existing heating systems.”

Sites and surroundings

The Site comprises an area to the south-east of the main UCL Bloomsbury Campus. The buildings relevant to the application are 16-25 Gordon Square, the Molecular Cell Biology Building located behind the Gordon Square properties, and Andrew Huxley Building which is located within the South Quadrangle of the UCL campus,, which are predominantly in educational use.

The Site falls within the Bloomsbury Conservation Area and 16-25 Gordon Square are Grade II listed (Listing No: 1113029 and 1113030). There are also several other listed buildings located within Gordon Square, to the north and east of the site. The Molecular Cell Biology Building, and the Andrew Huxley Building , to which this application also relates are not listed.

Relevant Planning History

Upon reviewing the Council's online planning register, we have provided a summary of the relevant planning applications relating to 'The Site':

16-18 Gordon Square

On 01 July 2004 listed building consent (ref: 2004/2057/L) was granted for **"Internal alterations including fire doors to student accommodation."**

On 22 July 2004 listed building consent (ref: 2004/2058/L) was granted for:
"Internal alterations to replace existing fire alarm system to existing student accommodation."

On 30 March 2011 listed building consent (ref: 2011/0698/L) was granted for **"Internal and external alterations associated with improved accessibility into and throughout the building."**

On 30 March 2011 listed building consent (ref: 2011/0696/P) was granted for **"Installation of a platform lift to the rear and associated alterations"**

On the 1 April 2022, listed building consent (ref: 2022/0422/L) was granted for **"Proposed internal works relating to removal of redundant servicing and installation of wall mounted interactive screens, wall mounted cameras, and associated servicing works."**

The above application also relates to 20,22,23 and 25 Gordon Square.

20 Gordon Square

On 31 March 2009 listed building consent (ref: 2008/5518/L) was granted for **"Alterations to front and rear elevations including replacement of sash windows, installation of secondary glazing and refurbishment of roof, installation of boilers and electrical services and minor internal alterations."**

25 Gordon Square

On 24 April 2008 listed building consent (ref: 2007/6375/L) was granted for **"Internal refurbishment of existing rooms to be used as office space, including removal of non-original infill walls at lower ground floor level in Wilkins building; removal of non-original walls at no.26 Gordon Square, replacement carpet, lighting, radiator and redecoration."**

Background and Proposals

The proposals seek to connect the Molecular Cell Biology Building ('MRC') and the Gordon Square buildings to the Gower Street District Heat and Power Network and update the existing connection to the Andrew Huxley Building.

Currently the DHN operates by pumping medium temperature hot water to various buildings around the

campus via four main energy centres. It is distributed via flow and return pipework arrangements. This pipework reticulates around the site, primarily through a combination of dedicated buried utility tunnels, through the buildings themselves and direct buried pipes.

The MRC Building and Gordon Square properties are currently served by independent gas fired heating systems. The proposal seeks to remove the dependency from the individual gas boilers and connect the buildings up to the District Heat and Power Network. In order to facilitate the connections, a number of works are proposed. A comprehensive detail of the proposed works are provided in the supporting Design and Access Statement, prepared by Buro Happold.

The Andrew Huxley building already benefits from a connection to the District Heat Network, however upgrades are required to the existing pipeline, which requires its enlargement, so that it is consistent with the new route feeding into the MRC and Gordon Square properties. The existing route to the building will be maintained.

In relation to the MRC building, this will be an entirely new connection to the DCN. With the new pipeline route extending from Gower Street and entering the building at the basement plantroom to the northwest of the building, which already benefits from pipework flanges to facilitate the connection.

The pipework route is proposed to continue to the Gordon Square properties connecting to the existing plantrooms at 17,20 and 25 Gordon Square, which serve the wider terrace. The existing gas boilers and associated equipment is to be entirely removed and replaced with plate heat exchangers and associated pipework. Externally, new pipework is to be installed to the plantroom of 17 Gordon Square.

To the listed buildings themselves, limited internal and external works are proposed. The external works relate solely to the removal of existing flues and other external fixtures associated with the removal of the gas boilers. Where fixtures and fittings are removed, all work will be made good with materials to match.

Within the buildings, existing pipework routes will be utilised to limit any impact on the historic fabric. Internal works are proposed to allow the existing connection at 17 Gordon Square to also serve 16 and 18 Gordon Square. This involves the creation of new pipework branches from the existing route in order to reach both properties. The new pipework is proposed to be installed at high level and within modern fabric where possible. The existing gas boilers within these properties are also proposed to be replaced with electric water heaters.

This submission is for planning permission and listed building consent for the respective works. However, the listed building consent submission only relates to the internal and external works to 16-25 Gordon Square, which are Grade II listed.

Development Plan

The London Borough of Camden's Local Development Framework comprises of the following planning policy documents: The London Plan (2021) and the Camden Local Plan (2017).

In addition, the National Planning Policy Framework (2021) is a material consideration.

Camden also have a number of adopted Planning Guidance documents which would be a material consideration.

Legislative Framework

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.

Section 66 of the planning (Listed Buildings and Conservation Areas) Act 1990 sets out that local planning authorities should pay special regard to the desirability of preserving a listed building or its setting or any features of historic or architectural interest which it possesses when consideration applications.

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 194 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 197 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.

The Framework goes on to state under paragraph 202 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 Statement

Policy D1 (Design) states that the Council will seek to secure high quality design in development. In order to achieve this overriding aim, development must preserve or enhance the historic environment and heritage assets in accordance with Policy D1, amongst other factors.

Policy D2 (Heritage) states that the Council will preserve and where appropriate enhance heritage assets and their settings including Conservation Areas and Listed Buildings. In relation to Conservation Areas, the policy states that the Council will require that development within Conservation Areas, preserves or where possible enhances, the character and appearance of the area. In relation to, Listed Buildings, the policy states that the Council will resist proposals for alterations where this would cause harm to the special architectural and historic interest of the building.

In order to facilitate the connections to the existing Gower Street District Heat and Power Network, a trench approximately 152m in length is proposed. Once the pipework is installed, the trench will be filled and existing surfacing re-instated. As the proposal for is an underground pipework, with the visual impacts being short term and temporary, it is considered that such works would not have an adverse impact on the character and appearance of the Conservation Area. Whilst the pipework route would require the lifting of the York stone to the rear of the Gordon Square buildings, this will be carefully re-laid on completion of the works.

In relation to the Gordon Square Buildings, externally very limited works are proposed, and these largely relate to the installation of pipework to the 17 Gordon Square plantroom. Whilst this would be at ground level only, it is acknowledged that it would result in additional fixtures to a heritage asset. In order to mitigate the impact of the additional fixings and ensure that the cluttering of external elevations is avoided, two large and prominent metal flues extending up the upper levels of the buildings are proposed to be removed, with the walls made good. Smaller external fixtures and fittings to the plantrooms are also proposed to be removed.

Internally, the majority of the work are confined to the three plantrooms, at 17, 20 and 25 Gordon Square, and the removal of the gas boilers and associated pipework and fixings. The plantrooms have been heavily altered, and internally hold little significance. The removal of the modern plant equipment, and the replacement with equipment to support the connection to the Gower Street Heat and Power network is therefore not considered to have an impact the special architectural or historic interest of the heritage assets.

Within the buildings themselves, existing pipework routes are to be utilised in order to avoid the need for additional openings in the historic fabric or additional routes that would lead to the cluttering of the internal walls. The most notable change would be to the fifth floor where there is currently heating flow and return pipework entering at, and serving, number 17 Gordon Square. This route is to be maintained with additional pipework branches proposed to the existing route in order to ensure 16 and 18 Gordon Square are catered for. Where the additional pipework branches are proposed, these are to be installed at high level and to modern fabric where possible.

In summary, the proposed works have been carefully designed to rationalise the installation of equipment both externally and internally, whilst also removing redundant equipment to assist in mitigating any perceived impact from the proposed works. Over, it is considered that the proposals would preserve the character and appearance of the Bloomsbury Conservation Area and would not harm the special architectural or historic interest of the Listed Buildings.

Sustainability

Policy CC2 (Adapting to climate change) requires development to be resilient to climate change and advocates the promotion of decentralised energy in order to achieve this. Furthermore, the Energy and Efficiency CPG highlights the importance of establishing and supporting existing decentralised energy in defined parts of the borough as these networks have the potential to transition to lower carbon and renewable energy sources over time.

The proposed development would link 17-25 Gordon Square and the Molecular Cell Biology (MRC) building to the existing Gower Street District Heat and Power Network thereby removing the need for these buildings to be served by independent gas fired heating systems. In addition, the proposals will replace pipework to maintain a suitable connection for the Andrew Huxley Building. These proposals are a significant benefit towards helping UCL to reduce their carbon emissions across their estate.

In summary, the conversion from independent gas fired heating systems to the District Heat Network is a notable benefit which maximises the use of a more sustainable energy source. Therefore, the proposed development would be in accordance with the objectives of Policy CC2.

Conclusion

The proposals relate to the installation of pipework, and associated equipment, to allow for the MRC, Gordon Square properties, and Andrew Huxley Building, to be connected to the existing nearby District Heat Network. Such works would assist in removing dependency on gas-fired boilers, towards a more sustainable energy source.

Once completed, the proposed trench, in which the external pipework would be laid, would not have any lasting visual impact and therefore the character and appearance of the Bloomsbury Conservation Area would be preserved. Furthermore, the pipework routes have been carefully considered so as to not impact on the special architectural or historic interest of the listed buildings, making use of existing routes wherever possible. In addition, the works would involve the removal of a number of unsightly redundant fixtures and fittings which would help to declutter and improve the appearance of the rear elevations of the listed buildings. The proposed development would therefore preserve the character and appearance of the Conservation Area and the special architectural and historic interest of the Grade II Listed Buildings.

In conclusion, the proposed development is considered to comply with relevant policies of the Camden Local Plan, namely Policies D1, D2 and CC2. Furthermore, the works would accord with the Planning (Listed Building and Conservation Areas) Act 1990 and Section 16 of the NPPF.

Supporting Documents

As part of the submission of the application on the Planning Portal (PP-11749305), we enclose the following documents:

- Application Form, duly completed and signed;
- Planning, Design and Heritage Statement, prepared by Gerald Eve;
- Design and Access Statement; prepared by Buro Happold
- Site Location Plan, prepared by Buro Happold; and
- Existing and Proposed drawings, prepared by Buro Happold.

A fee of £266.20 (including Planning Portal admin fee) has been submitted for the Full Planning Application. No separate fee is payable for the Listed Building Consent.

We look forward to your confirmation of the validation of this application. In the meantime, should you have any questions, please do not hesitate to contact Paige Ireland (07557 178 129) or Abdul Mehdi (07795 971 526) of this office.

Yours faithfully,



Gerald Eve LLP