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Our ref: LEO/SNE/HSC/U0022870

Your ref: PP-11995076

05 June 2023

Dear Sir/ Madam

Town and Country Planning Act 1990 (as amended)
Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)
Kathleen Lonsdale Building, Gower Place, Bloomsbury, Camden, WC1E 6BT
Applications for Full Planning Permission and Listed Building Consent

On behalf of our client, University College London, we write to submit an application for full planning permission and listed building consent for the installation of new gas supply pipework, new gas cylinder cages and other associated works to the rear of the Kathleen Lonsdale Building, Gower Place, Bloomsbury, Camden, WC1E 6BT.

Full Planning Permission is sought for:

"Installation of new external gas supply pipework, gas cylinder cages, alterations to the landing, step and lightwell and a new metal ramp, railing, and other associated works to the rear of the building."

Listed Building Consent is sought for:

"Installation of new external and internal gas supply pipework, gas cylinder cages, alterations to the landing, step and lightwell and a new metal ram, railing, and other associated works to the rear of the building."

# **Background**

The Kathleen Lonsdale Building is located on Gower Place and is situated north-west of the main UCL Bloomsbury Campus. The site is currently used for educational purposes by University College London (UCL).

The Site is designated on the Council's Policy Map as within the Bloomsbury Conservation Area. The Kathleen Lonsdale Building is a Grade II Listed Building (Listing no: 1322169). There are also several other listed buildings nearby.

The Site has a PTAL rating of 6b owing to its proximity to Euston Square underground station. 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.

#### **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 July 2020, Full Planning Permission (ref. 2020/2136/P) was granted for "Installation of 7 x condensing units to replace 2 x existing units within the front lightwell and associated works."

On 08 July 2020, Listed Building Consent (ref. 2020/2185/L) was granted for "Installation of 7 x condensing units to replace 2 x existing units within the front lightwell and the refurbishment of the associated 5 x Cold Rooms at basement level, and associated works."

On 20 May 2020, Listed Building Consent (ref. 2020/2009/L) was granted for "Creation of a new opening and associated works between the Data Centre and the Lift Motor Room within the basement of the Kathleen Lonsdale Building."

On 23 January 2019, Listed Building Consent (ref. 2018/5372/L) was granted for "Repairs to the stone facade of the Kathleen Lonsdale Building."

On 08 November 2018, Listed Building Consent (ref. 2018/3276/L) was granted for "Repair and maintenance of the external envelope of the Kathleen Lonsdale Building UCL."

On 29 July 2016, Full Planning Permission (ref. 2016/2577/P) was granted for "Erection of rear extension to create lobby for GMP Lab; replacement doors; installation of double glazing to rear windows; alterations to louvres and flues and installation of plant."

On 29 July 2016, Listed Building Consent (ref. 2016/2764/L) was granted for "Reconfiguration and alteration of internal layouts; the erection of rear extension to create lobby for GMP Lab; replacement doors; installation of double glazing to rear windows; alterations to louvres and flues; and installation of plant."

On 01 October 2015, Full Planning Permission (ref. 2015/4349/P) was granted for "Amendment of planning permission 2014/7223/P granted 28/01/2015 for 'replacement of plant & machinery, new flues & louvres' namely for erection of 4 flues at 3rd floor and 1x flue at ground floor on rear elevation."

On 01 October 2015, Listed Building Consent (ref. 2015/4931/L) was granted for "Erection of 4 flues at 3rd floor and 1x flue at ground floor on rear elevation."

On 01 October 2015, Full Planning Permission (ref. 2015/4348/P) and Listed Building Consent (ref. 2015/4924/L) was granted for "Erection of rear extension to create lobby for GMP Lab, with associated gas enclosure, at west end of basement level."

On 28 January 2015, Full Planning Permission (ref. 2014/7223/P) was granted for "Replacement of plant & machinery, new flues & louvres, replacement of external entrance doors, installation of double glazing to rear windows."



On 28 January 2015, Listed Building Consent (ref. 2014/7310/L) was granted for "Alterations in connection with the replacement of plant & machinery, new flues & louvres, replacement of external entrance doors, installation of double glazing to rear windows, including internal alterations to entrance hall security desk, creation of new student hub, reconfiguration of internal layouts involving various alterations to doors, partitions & joinery."

On 26 May 2009, Full Planning Permission (ref. 2009/1667/P) and Listed Building Consent (ref. 2009/1723/L) was granted for "Installation of a louvered metal mesh screen to enclose existing generator located at rear of site"

On 27 June 2007, Full Planning Permission (ref. 2007/1914/P) and Listed Building Consent (ref. 2007/1917/L) was granted for "Alteration to existing rear window to provide new fire door to rear and installation of replacement external condensers for air conditioning to existing university building (Class D1)."

On 16 January 1998, Full Planning Permission (ref. PS9705129) and Listed Building Consent (ref. LS9705130) for "the erection of a dormer extension at roof level in connection with the installation of additional plant and duct work, together with internal rearrangement of rooms and laboratories, as shown by drawing numbers 992/10, 992/12, 992/15 & 992/16."

On 21 October 1994, Full Planning Permission (ref. 9401289) was granted for "The erection of two chiller units in place of the two cooling towers on the roof of the rear elevation together with the widening of an existing dormer to the roof top plant room. as shown on drawings numbered 980/0.S 980/2 980/3 980/12C and 980/9."

On 21 October 1994, Listed Building Consent (ref. 9470255) was granted for "The erection of two chiller units in place of two cooling towers on the roof of the rear elevation together with the widening of an existing dormer to the roof top plant room and a new lift and alterations to layout of third floor. as shown on drawings numbered 980/0.S 980/2 980/3 980/12C and 980/9."

On 23 April 1991, Full Planning Permission (ref. 9000522) was granted for "Construction of a single storey waste chemical store at the rear of the building as shown on drawing numbers 1/101/6 1/101/7 and 900/08/2."

On 23 April 1991, Listed Building Consent (ref. 9070189) was granted for "Removal of rear access stair/store and erection of a single storey waste chemical store as shown on drawing numbers 1/101/6 1/101/7 and 900/08/2."

On 08 May 1986, Full Planning Permission (ref. 8500530) was granted for "The erection of two extract ducts to the rear of the property. As shown on drawing no: 345/E1."

On 27 February 1985, Listed Building Consent (ref. 8570016) was granted for "Alterations to seven rooms in the ground floor and basement for use by the Geology Department including the provision of three extractor hood units and associated duct work to roof level. (As shown on drawings numbered 345 L1 L2A L3A & E1)."

The planning history above is extensive and demonstrates a number of additions and alterations have been made to the building over previous decades.



# **Proposals**

A schedule of internal and external works is proposed to the rear of the Kathleen Lonsdale Building at ground floor level. Internally, the works involve the installation of new gas pipework in existing laboratory rooms. Externally, the works consist of the installation of new pipework, new external gas cylinder cages, new hand railings, alterations to the landing, step and lightwell and a new metal ramp.

These works are required to allow for gas cylinders currently used by the occupiers of the building to be stored externally, for health & safety reasons. By locating the gas cylinders outside, this leads to a requirement for storage cages, and pipework, to accommodate the cylinders and associated transport of the gas into the building. Minor amendments are also proposed to a step to the rear of the building, to a ramp, to allow for appropriate delivery of the cylinders to the associated storage cages.

For ease of reference, a summary of the proposed works has been listed below. More details can be found in the supporting drawings, and schedule of works, prepared by Porter Raper.

# Internal works:

1. New internal gas supply pipework leading from the gas cylinders cages to the laboratories where gas is required, this includes rooms OB09, OB12 and B22;

#### External works:

- 1. New external gas supply pipework to the rear of the building leading into the laboratories where gas is required, this includes rooms OB09, OB12 and B22;
- 2. Three new gas cylinder cages to the rear of the building;
  - The 4-cylinder cage will supply rooms OB09 and OB12;
  - The 2-cylinder gas cage supply room B22; and
  - The 3-cylinder storage cage will store spare gas cylinder bottles with no pipework connections proposed;
- 3. New handrail and balustrade to the rear of the building to match the base of the ramp; and
- 4. A section of the existing concrete ramp and lightwell will be replaced with concrete and the installation of a new metal ramp.

The new cylinder cages would be painted steel with mesh doors and a sloping roof. Parts of the external pipework will sit within powder coated black cable trays and be fixed to the brickwork using new fixing brackets whilst other areas of pipework would be fitted directly to the wall using stainless steel mounting brackets. No existing fixtures and fittings are being removed, as part of the proposed works and where possible these will be utilised. The proposed external pipework has been routed to minimise any visual impacts by following existing service routes, where possible.

The internal pipework is proposed to be hidden above the suspended ceiling and all rooms will be provided with gas monitoring equipment. The internal pipework has been routed to minimise any visual impacts and ensure safety within the laboratories.



The remodelling of the bottom of the ramp and concrete step leading from the service road to the lightwell will allow deliveries / removals of the gas cylinders to and from the new cylinder cages.

### **Local Development Framework**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications and applications for listed building consent to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.

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).

Camden also have several adopted Planning Guidance documents which are also a material consideration.

The National Planning Policy Framework (2021) is a material consideration.

# **Statutory Legislation**

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 is possesses.

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 considering 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.

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 (paragraph 202).

# **Planning Assessment**

### Design and Heritage

Policy D1 of the Local Plan sets out that the Council will seek to secure high quality design that, amongst other things, respects local context and character and preserves or enhances the historic environment and heritage assets.

Policy D2 of the Local Plan sets out that the Council will seek to preserve and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, especially the conservation areas and listed buildings. To maintain the character of Camden's conservation areas, the Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. 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 proposed works seek to enhance UCL's facilities through improving operational efficiency and safety measures at the Grade II Kathleen Lonsdale Building which falls within Bloomsbury Conservation Area. The proposed works have sought to maintain the existing quality and appearance of the building's interior and exterior. The works include the installation of new pipework routing from 2 new gas cylinder cages to 3 rooms/laboratories which require a gas supply. Of the 3 gas cylinder cages proposed, 2 will connect to the laboratories whilst the third will only store gas bottles. The works also include a new handrail and balustrade to the rear of the building to match the base of the ramp. In addition, a section of the existing concrete ramp and lightwell will be replaced to allow for deliveries/ removals of the gas bottles to occur more efficiently.

The proposed works seek to utilise existing fittings where possible however new fixings are proposed to the rear of the building to allow the pipework to sit in place. The location of the new external pipework has been the subject pre-application discussions and the route presented is the most direct with least visual impact as the pipework sits above the window frame. The internal pipework is proposed to be hidden in suspended ceilings to ensure it is not visible and does not harm any historic fabric. The gas cylinders are proposed to match existing gas cylinders in the immediate vicinity ensuring a consistent approach to servicing to the rear of the building. The proposals are limited to the rear of the Kathleen Lonsdale Building, and located adjacent to existing servicing, therefore preserving the character and appearance of the Conservation Area.

The proposed works are therefore considered to be in full accordance with the Local Plan Policy D1 and D2, as well as relevant national policy. Furthermore, the works would meet the statutory test of the Planning (Listed Buildings and Conservation Areas) Act 1990.



# **Educational use**

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 installation of new gas supply pipework and a new cylinder cage stores for the Kathleen Lonsdale Building will improve the safety of the laboratories, assist in providing fit-for-purpose teaching spaces which meet the current requirements of students and staff of the university. The proposed works will enhance the existing educational use, whilst ensuring the safety of students within the Kathleen Lonsdale Building. Therefore, the proposal therefore complies with Local Plan Policy C2.

#### Conclusion

The proposed works are required to improve safety and efficiency within the laboratories at the Kathleen Lonsdale Building. The proposed works are considered to be sensitive to the heritage asset and have sought to avoid impacting any historic fabric. The proposal is also limited to the rear of the Kathleen Lonsdale Building so there would be no change in the impact on the character and appearance of the wider Conservation Area.

Therefore, we consider that the proposal is in accordance with the Development Plan and should be determined positively without delay.

# **Application Enclosures**

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

- Application Form, prepared by Gerald Eve;
- Community Infrastructure Levy From, prepared by Gerald Eve LLP;
- Design and Access Statement, prepared by Gerald Eve;
- Drawings;
  - Site Location Plan (ref. LB032-SW2215 KLB-100);
  - Proposed Basement Floor Plan (ref. LB032-SW2215 KLB-001);
  - Proposed BOC Three Cylinder Cage (ref. LB032-SW2215 KLB-002);
  - o Proposed BOC Six and Two Cylinder Cage (ref. LB032-SW2215 KLB-003);
  - Proposed Ramp Hand Rail (ref. LB032-SW2215 KLB-004);
  - Existing Rear Elevation (ref. LB032-SW2215 KLB-101);
  - Proposed Rear Elevation (ref. LB032-SW2215 KLB-102);
  - Existing Basement Floorplan (ref. LB032-SW2215 KLB-103);
  - Proposed Basement Floor Plan and Two and Four Cylinder Cage (ref. LB032-SW2215 -KLB-104);
- Proposed External Gas Supplies to Chemistry Laboratories (ref. UCL KLB External Gas Supply -Option 3);
- Photographs with Annotations;
  - o Room B22 Internal;
  - Room OB09 Internal;
  - o Room OB12 Internal;
- Schedule of Works (ref. SW2215 KLB Specialist Gas Supply SOW REV1); and
- SW2215 UCL Kathleen Lonsdale Building Specialist Gas Supply NBS Specification (13-03-2023).



The application fee of £234.00 (including £64.00 Planning Portal fee) has been paid via Planning Portal.

Should you have any questions, please do not hesitate to contact Sam Neal (0203 486 3312) or Hannah Scott (0207 518 7271) of this office.

We look forward to hearing from you shortly.

Yours faithfully,

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**Gerald Eve LLP**