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London Borough of Camden  
Planning and Borough Development  
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**FAO: Laura Dorbeck**

**Our ref:** LEO/LHA/ASI/U0024290

**Your ref:** PP-12360640

25 September 2023

Dear Sir/Madam,

**Town and Country Planning Act 1990 (as amended)**  
**Planning (Listed Buildings and Conservations Areas) Act 1990**  
**Application for Full Planning Permission and Listed Building Consent**  
**Bentham House, 4-8 Endsleigh Gardens, London, WC1H 0EH**

We write on behalf of our client, University College London ('UCL') (the 'Applicant'), to submit an application for full planning permission and listed building consent for the installation of an external intercom and video security system on the front entrance of Bentham House, 4-8 Endsleigh Gardens, London, WC1H 0EH (the 'Site').

Planning permission and listed building consent is therefore sought for the following:

**"Installation of intercom system to the front entrance of Bentham House and associated works."**

#### **Site and Background**

This application relates solely to the front entrance of Bentham House. Bentham House is currently occupied for educational purposes (UCL Faculty of Law). The Site is located on the corner of Endsleigh Street and Endsleigh Gardens, with Tavistock Square to the South and Woburn Place to the East.

The building is Grade II listed and is located in close proximity to the Grade II listed Hilton Hotel and Grade II listed 3-6 Endsleigh Street and attached railings. The building is also located in the Bloomsbury Conservation Area.

The surrounding buildings are predominantly educational and form part of the wider UCL campus, including the UCL Computer Science building (169 Euston Road) and UCL Bartlett School of Planning (14 Upper Woburn Place). There are also some clusters of residential and hotel uses nearby.

The Site has a PTAL rating of 6b owing to its close proximity to Euston Square underground station and Euston underground, overground and railway station. Warren Street, Russel Square and Goodge Street underground stations are also within a short walking distance from the Site. There are also a number of bus routes serving the area from Tavistock Square and Endsleigh Gardens.

#### **Relevant Planning History**

A planning history search has been undertaken using Camden's planning register to establish the planning record for the Site. A summary of the recent and relevant planning history has been set out below.

On 26 September 2018, an application for listed building consent (2018/3162/L) was granted for the following:

**“Internal alterations to Moot Court teaching facility to enable installation of audio visual equipment.”**

On 20 November 2017, an application for full planning permission (2017/5671/P) was granted for the following:

**“Replacement of the existing black monolith on Endsleigh Gardens (near the corner with Endsleigh Street) with a stone clad monolith.”**

On 20 November 2017, an application for listed building consent (2017/4832/L) was granted for the following:

**“Replacement of the existing black monolith and signage on Endsleigh Gardens (near the corner with Endsleigh Street) by a stone clad monolith and new signage on the existing plinth and the addition of a new sign on the return boundary wall on Endsleigh Street.”**

On 20 November 2017, an application for advertisement consent (2017/4537/A) was granted for the following:

**“Display of an internally illuminated sign on a monolith on Endsleigh Gardens (near the corner with Endsleigh Street) and a non-illuminated fascia sign on the Endsleigh Street elevation.”**

As demonstrated by the relevant planning history set out above, a wide range of applications for full planning permission and listed building consent have been granted at the Site.

### **The Proposal**

Planning permission and listed building consent is sought for the installation of an external intercom system to the front entrance of Bentham House.

The new intercom system would measure 174mm high x 326mm wide x 47mm deep, sitting approximately 1 metre above ground floor, creating new hands free ‘virtual reception’ which aims to improve the overall security and access arrangements at Bentham House for staff and students.

The proposed works are set out in further detail in the supporting Planning Report and Drawings, prepared by Alpine Works.

### **Planning Policy Context**

Section 38(6) of the Planning & Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the Development Plan unless material considerations indicated otherwise. Accordingly, the proposals are assessed against the policies of the London Plan (adopted 2021) and Camden’s Local Plan (adopted 2017).

Whilst not forming part of the Statutory Development Plan, the following documents remain important material considerations:

- National Planning Policy Framework (NPPF) (2023);
- National Planning Practice Guidance (NPPG) (as amended); and
- London Borough of Camden’s Supplementary Planning Documents.

As the proposals affect a listed building within a Conservation Area, consideration has been given to Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

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 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**

Paragraph 194 of the NPPF states that 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 of the NPPF 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.

Paragraph 202 of the NPPF states 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 Policy Assessment**

##### Design and Heritage

Policy D1 of Camden's Local Plan sets out that the Council will seek to secure high quality design in development and requires that development respects local context and character, preserves or enhances the historic environment and heritage assets, is of sustainable and durable construction and is adaptable to different activities and land uses and comprises details and materials that are of high quality and complement the local character.

Policy D2 of Camden's Local Plan sets out that the Council will seek to preserve and where appropriate, enhance heritage assets and their settings, including conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits. In order to maintain the character of conservation areas, the Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.

The proposals seek to install an external intercom system to the front entrance of the building to improve the existing security and access arrangements at Bentham House for staff and students of the University. The design of the system will be in keeping with other systems which have been installed around the campus. The proposals will be minor in scale and of high quality design, and will complement the local context and character of the area.

To assess the full impact of the proposals on the significance of the Grade II listed building and surrounding Bloomsbury Conservation Area, a Heritage Assessment has been prepared by Gerald Eve LLP and has been submitted (and appended to this covering letter) as part of this application for the Council's consideration.

In summary, the proposed works are very minor in nature and would preserve the significance of the Grade II listed building. Should the Council consider the proposed works to cause any degree of 'less than substantial harm' to the building, we would highlight the importance of improving the security and access system at Bentham House to sustain the Grade II listed building in its current viable use and the wider benefits to education arising from the proposals.

Overall, the proposals are considered to preserve the significance of the Grade II listed building and the character and appearance of the Bloomsbury Conservation Area. Therefore, the proposals are considered to be in accordance with Policies D1 and D2 of the Camden's Local Plan, as well as the relevant NPPF paragraphs relating to the historic environment.

#### Enhancing Community Facilities

Policy C2 of Camden's Local Plan 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 an external intercom video system to the front entrance will improve the overall security and access arrangements at Bentham House, resulting in a safer and more secure environment that meets the needs of both students and staff members. The proposal therefore complies with Policy C2 of Camden's Local Plan.

#### **Summary**

In conclusion, the proposed development complies with the relevant policies of Camden's Local Plan, namely Policies D1, D2 and C2. Furthermore, the works would accord with the Planning (Listed Buildings and Conservation Areas) Act 1990.

The proposed works would preserve the significance of the Grade II listed building, as well as the character and appearance of the wider Bloomsbury Conservation Area. Therefore, we consider that the proposal accords with the Development Plan.

#### **Application documentation**

In accordance with the London Borough of Camden's validation requirements, the following documents have been submitted in support of this application:

- Completed Application Form, prepared by Gerald Eve LLP;
- Covering Letter, prepared by Gerald Eve LLP;
- CIL Additional Information Form, prepared by Gerald Eve LLP;
- Site Location Plan, prepared by Alpine Works;
- Existing and Proposed Elevations prepared by Alpine Works;
- Design and Access Statement, prepared by Gerald Eve LLP;
- Heritage Assessment (Appendix of Covering Letter), prepared by Gerald Eve LLP; and
- Planning Report, prepared by Alpine Works.

The requisite application fee of £234.00 (Plus a Planning Portal admin fee of £64.00) has been paid online via the Planning Portal at the time of submission.

Please do not hesitate to contact Lucy Hale [REDACTED] or Aadam Siddiqui ([REDACTED]) of this office should you have any questions or concerns. We look forward to receiving notice of your receipt and validation.

Yours faithfully,



**Gerald Eve LLP**  
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**Appendix**



## Heritage Assessment

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### UCL Bentham House, 4-8 Endsleigh Gardens, London, WC1H 0EH Heritage Assessment

#### Introduction

1. On behalf of UCL, Gerald Eve has prepared a Heritage Assessment to accompany the planning and listed building consent application relating to the installation of an intercom system to the front entrance of Bentham House, 4-8 Endsleigh Gardens, London, WC1H 0EH.
2. The Heritage Assessment identifies the significance of the external part of the building where the proposed works are taking place, sets out a summary of the proposals, and an assessment of how the proposals impact the heritage significance of the asset as a whole. The assessment also considers the effect of the proposals on the Bloomsbury Conservation Area.

#### Statutory Framework

3. The statutory provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 are relevant to this application. Both the building's fabric and setting have been considered in the development of the proposals having regard to the legislation set out below.
4. Section 16 of the 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.
5. 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.
6. 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.

#### Planning Policy Context

7. Under Paragraph 194 of the NPPF (2023), 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.
8. Paragraph 197 of the NPPF (2023) states that in determining planning applications, local planning authorities should take account of:





## Heritage Assessment

- a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
  - c) The desirability of new development making a positive contribution to local character and distinctiveness.
9. Where a development proposal will lead to a less than substantial harm to the significance of a designated heritage asset, Paragraph 202 of the NPPF (2023) state that this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
10. Policy D1 of Camden's Local Plan (2017) 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.
11. Policy D2 of Camden's Local Plan (2017) 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. The Council will not permit the loss or substantial harm of a designated heritage asset, including conservation areas, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits. 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.

### Assessment of Significance

12. Bentham House is currently occupied for educational purposes (UCL faculty of law). The site is located on the corner of Endsleigh Street and Endsleigh Gardens, with Tavistock Square to the South and Woburn Place to the East.
13. Bentham House is a Grade II listed building located in the London Borough of Camden.
14. The building was listed in May 2014 (List Entry: 1417858) with the following list description:

**"Built in 1953-7 as the headquarters for the National Union of General and Municipal Workers (NUGMW), Bentham House is executed in a stylised Classical idiom to the designs of H and H Martin Lindsay. Outside principal spaces, such as the entrance lobbies, stair towers and the former council chamber, the building's interior is of lesser special interest, particularly in the more heavily altered basement, sub-basement, and attic levels.**

Bentham House, built 1953-7 as the headquarters of the National Union of General and Municipal Workers, and designed H and H Martin Lidbetter, is listed at Grade II for the following principal reasons: \* Architectural interest: with its skilful and creative handling of form and detail, the building is a stylish example of post-war classicism; \* Historic interest: it is a rare example of a purpose-built union headquarters of architectural note, constructed at a time when union size and strength was building to its peak, in a location favoured by such organisations; \* Artistic interest: Burton's bold, expressive, carvings have high artistic interest and enliven the building's elevations, as well as celebrating its original function; \* Quality of materials: the building employs a high quality of materials both externally and in the main internal spaces; \* Interior survival: little-altered throughout, the principal interior interest lies in the handsomely fitted main entrance lobbies, stair towers, and the moot court (formerly the council chamber)."

15. The works proposed are located to the external front entrance of the building. The principal exterior elevations of Bentham House are of high significance.
16. The site is also located within the Bloomsbury Conservation Area within Sub-Area 1 (Euston Road) of the Conservation Area designation.
17. The building is described in the Bloomsbury Conservation Area Appraisal and Management Strategy as follows:

"Bentham House, a notable university building housing UCL Faculty of Arts built to the designs of H & H Martin Lidbetter in 1954-1958. Constructed from Portland Stone, it has four principal storeys and is finely detailed with neo-Georgian and Art Deco influences, the proportion of which reflect those of its 19<sup>th</sup> century neighbours. The corner of Bentham House is expressed by an angled entrance forming a focal point in the street scene, and the building is terminated by Endsleigh Gardens and Endsleigh Street by projecting towers."

#### The Proposals and their Impact on Significance

18. The proposals seek to improve the existing access and security arrangements for staff and students at Bentham House. The applicant is seeking planning and listed building consent for the installation of an external intercom system to the front entrance of Bentham House.
19. Further details can be found in the supporting drawings and planning report document, prepared by Alpine Works, and covering letter and design and access statement, prepared by Gerald Eve LLP.
20. **Works to the exterior of the building** - The intercom system will be screwed and fixed to the external wall of Bentham House, with minimal intervention, using plugs and screws. A small hole will be drilled





## Heritage Assessment

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from the back of the existing card reader to the back of the new intercom system, utilising an existing cabling route which would not be visible, negating the need for any surface mounted containment. While the front elevation is considered to be of high significance, the proposed works are minimal and are not considered to cause harm to the significance of the asset as a whole.

21. **Works within the Conservation Area** - The intercom system has been sympathetically designed and is discreet to not impact the character and appearance of the Bloomsbury Conservation Area. The proposals will therefore preserve the character and appearance of the Conservation Area and its surroundings.
22. Overall, the proposed works are very minor in nature and would preserve the significance of the Grade II listed building. Should the Council consider the proposed works to cause any degree of 'less than substantial harm' to the building, we would highlight the importance of improving the security and access system at Bentham House to sustain the Grade II listed building in its current viable use and the wider benefits to education arising from the proposals.
23. To conclude, the proposed works would preserve the significance of the Grade II listed building and the character and appearance of the Bloomsbury Conservation Area. Therefore, the proposals are considered to be in accordance with the relevant policies of Camden's Local Plan, namely Policies D1, D2 and C2, as well as relevant national policy relating to the historic environment. Furthermore, the applications would satisfy the statutory provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990.