



UCL Bicentennial – Main Quadrangle and  
Wilkins Building

Planning Statement

On behalf of: University College London

July 2024



## Planning Statement

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**On behalf of:** University College London

**Date:** July 2024

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## **1 Introduction**

- 1.1 This Statement has been prepared by Gerald Eve LLP on behalf of our client, University College London ('UCL' or 'the Applicant'), in support of an application for full planning permission and listed building consent for proposed works to the Main Quadrangle and Wilkins Building, Gower Street, London, WC1E 6BT ('the Site'). The Site is within the London Borough of Camden ('LBC') who will be the Local Planning Authority determining the Applications.

### **University College London and Bicentennial Year**

- 1.2 UCL was founded in 1826 and is considered as London's leading multidisciplinary university with more than 16,000 staff and 50,000 students from over 150 different countries. UCL was recently ranked by The Sunday Times as University of the Year in 2024.
- 1.3 The student population has grown consistently over the past 10 years and projections indicate that demand for places will continue to grow on an annual basis. To accommodate this anticipated growth, and to maintain an environment befitting of a world-class university, it is necessary to undertake improvement and refurbishment works.
- 1.4 In 2026, UCL will be celebrating its bicentenary year. To mark this occasion, UCL have identified a number of improvement and refurbishment works and building legacy projects to undertake and complete by the bicentenary year. The focal point for the bicentennial year will be the significant refurbishment works in the Main Quadrangle and Wilkins Building which seek to improve the educational space on campus and better reflect the University's world class status as a leading University.

### **Proposed Development**

- 1.5 This Statement provides a review of relevant national, regional and local planning policy in relation to the Proposed Development. It sets out the planning justification for the Proposed Development and contains a detailed assessment in relation to relevant Development Plan policies, other material planning considerations and the statutory duties in respect of the historic environment.

1.6 The Application is assessed in relation to planning policy, guidance and the statutory tests with which, for the reasons set out within this Statement, it complies when considered as a whole.

1.7 The proposed development comprises works to the Wilkins Building and the Main Quadrangle within the heart of the UCL Bloomsbury Campus. Works to the Wilkins Building include the introduction of new openings between the Cloisters and adjacent rooms, creation of multi-functional spaces, installation of a new stair and lift to improve accessibility arrangements, extensive refurbishment works to the Jeremy Bentham Room and adjoining rooms at ground floor level, creation of step free internal access to the Jeremy Bentham Room and Low Refectory, replacement glazing to windows in the Cloisters and adjoining rooms, installation of plant at roof level, and other associated works.

1.8 Works to the Main Quadrangle include a comprehensive re-landscaping of the area, biodiverse planting and habitat creation, improved access to the Slade School of Art and Wilkins Building via sloped access, permanent raised beds and seating which can be used for a variety of uses/events, installation of canopies, cycle and disabled parking, replacement of Slade roof lights, waterproofing of Chadwick Building and associated works.

1.9 Planning permission is therefore sought for the following:

**“Refurbishment and improvement works, including creation of sloped access to the Slade and Wilkins Building, replacement of roof lights for the Slade Building, installation of canopies and landscaping works in the Main Quadrangle, installation of plant and enclosure on the Wilkins Building roof, waterproofing works to the Chadwick Building basement, cycle parking, disabled parking, and associated works.”**

1.10 Listed building consent is therefore sought for the following:

**“Refurbishment and improvement works to the Wilkins Building, including the creation of new openings and replacement of glazing in the Cloisters and adjacent rooms, works for the installation of a new staircase and accessible lift, installation of plant at roof level, landscaping of the Main Quadrangle, introduction of sloped access to buildings, replacement of rooflights for the Slade Building, waterproofing works to the Chadwick Building, and associated works.”**

## **Consultation**

- 1.11 The Application is being brought forward following detailed pre-application discussions with the London Borough of Camden, Historic England, and other stakeholders. Stakeholders such as the Bloomsbury Association, and Bloomsbury Conservation Area Advisory Committee ('BCAAC') have also been reached out to and will continue to be during determination of the Application.
- 1.12 The Application proposals have evolved over the pre-application consultation period and have been revised to accommodate advice and comments received. The design process has been iterative, taking consultation and analysis from technical assessments into consideration.

## **Application Documentation**

- 1.13 In addition to the Planning Statement, a number of stand-alone reports have been prepared to explain and assess all relevant aspects of the Proposed Development. The full submission documentation has been agreed with officers of LBC during pre-application discussions.
- 1.14 This Statement, should be read alongside the application forms, together with the proposed plans and drawings which are submitted and the following supporting documentation:
- Completed application forms, prepared by Gerald Eve LLP;
  - Town Planning Statement (this document), prepared by Gerald Eve LLP;
  - Covering Letter, prepared by Gerald Eve LLP;
  - Community Infrastructure Levy Additional Information Form, prepared by Gerald Eve LLP;
  - Site Location Plan / Site Plan, prepared by Burwell Architects;
  - Existing and Proposed Plans, Elevations and Sections (Including fabric removal), prepared by Burwell Architects;
  - Design and Access Statement (Including sustainability, transport and drainage information), prepared by Burwell Architects;
  - Heritage Statement, prepared by Alan Baxter;
  - Noise Assessment, prepared by BDP;
  - Structural Report, prepared by BDP;
  - Ecological Impact Assessment (including BNG report), prepared by Tyler Grange;
  - Lighting Assessment, prepared by BDP;

- Tree Survey / Arboricultural Assessment, prepared by BDP;
- Fire Safety Strategy, prepared by Bureau Veritas.

## 2 Site and Surroundings

2.1 This section of the Town Planning Statement sets out the location of the Site and character and context of the surrounding area. The full extent of the Site is shown on the supporting Site Location Plan / Site Plan, submitted in support of the application.

### The Site

2.2 The Site is located within the UCL Bloomsbury Campus on Gower Street and is bound by Gower Place to the North, Gordon Street and Gordon Square to the East, and Gower Street to the West. The Site is located in the Bloomsbury Conservation Area.

2.3 The Site is currently occupied by UCL for Education purposes (Use Class F1(a)).

2.4 The Main Quadrangle is UCL's main entrance to the Bloomsbury Campus. The Main Quadrangle area is dominated by the Grade I listed Wilkins Building, which is listed for its architectural and historic significance, and is deemed as emblematic for the University. The surrounding buildings (Slade School of Art, Chadwick Building, Student Hub Building and Physics Building) also form part of the Grade I listing. The Main Quadrangle area also contains two observatories which are Grade II listed.

2.5 The Main Quadrangle comprises a landscaped area with little design context. A temporary structure is located on the southern end of the Quadrangle and is currently used as teaching/lab space. The landscaped area also includes hard and soft landscaping, cycle parking, planting, roof lights for the Slade, and the Grade II listed observatories.

2.6 The Site benefits from a public transport accessibility level (PTAL) of 6b, which is the highest achievable rating. This rating can be attributed to the Site's close proximity to a number of underground stations, including Euston / Euston Square, Russell Square, Goodge Street, Warren Street and Kings Cross & St Pancras Internal Station. There are also several bus routes serving the site, notably from Gower Street, Euston Road and Woburn Place.

2.7 The Site has the following planning designations

- Bloomsbury Conservation Area;
- Open Space;



- Central London Area; and
- Central Activities Zone.

### **The Surrounding Area**

- 2.8 The Site is surrounded by a mixture of educational, residential, and commercial uses. The Site sits within close proximity to a number of other Higher Education Institutions which form part of the wider Bloomsbury Campus Area.
- 2.9 The building typology within the surrounding area varies greatly in terms of height, form, age, and materiality. Adjacent to the Site building heights range from 3 to 17 storeys.
- 2.10 The Site is located in close proximity to a number of other listed buildings including:
- 23 Gower Place – Grade II listed;
  - University College chemistry laboratory and attached railings and wall – Grade II listed;
  - Number 16 to 25 Gordon Square – Grade II listed;
  - Number 26 Gordon Square – Grade II listed; and
  - University College hospital general block only and attached railings – Grade II listed.

### 3 Planning History

- 3.1 A planning history search has been undertaken using LBC’s planning register to establish the planning record at the Site. The relevant applications have been set out below for reference.

#### Main Quadrangle

- 3.2 On 1 August 2022, an application for full planning permission was granted under application ref. 2022/2717/P for the following:

**“Installation of drainage systems and associated works outside the temporary teaching facility in Main Quad.”**

- 3.3 On 9 February 2022, an application for full planning permission was granted under application ref. 2021/6197/P for the following:

**“Use of the temporary teaching facility (Class D1) in the Main Quad of the Wilkin’s Building for a further three academic years (2022-2025) until 31 July 2025.”**

- 3.4 On 19 July 2017, an application for full planning permission was granted under application ref. 2017/2934/P for the following:

**“Erection of two-storey temporary structure within the Main Quad of the Wilkin’s Building for use as teaching space (Class D1) for a period of 5 years.”**

#### Wilkins Building

- 3.5 On 26 August 2022, an application for listed building consent was granted under application ref. 2022/2861/L for the following:

**“Installation of domestic water and electrical services, including hot and cold water pipework, cold water storage tank, cold water booster pump set, hot water generation plant and associated equipment.”**

3.6 On 2 July 2020, an application for listed building consent was granted under application ref. 2020/2108/L for the following:

**“Installation of fan coil units for controlled heating and cooling in Room G10 and the Whistler Room and pipework in Rooms G09, G10, G11 and G90 of the Wilkins Building and associated works.”**

3.7 On 11 September 2019, an application for listed building consent was granted under application ref. 2019/3142/L for the following:

**“Internal refurbishment works of rooms B58 and B60 in the North Wing of the Wilkins Building to enable their continued as a sound recording areas.”**

3.8 On 12 September 2019, an application for listed building consent was granted under application ref. 2019/3141/L for the following:

**“Internal refurbishment works to improve the existing condition of room G02 in the South Wing of the Wilkins Building.”**

3.9 On 10 April 2019, an application for full planning permission was granted under application ref. 2019/0456/P for the following:

**“The refurbishment of the Wilkins Building Old Refectory and adjacent spaces, including upgraded WC facilities, staff office space, and roof lighting to provide a new learning space.”**

3.10 On 10 April 2019, an application for listed building consent was granted under application ref. 2019/0165/L for the following:

**“The refurbishment of the Wilkins Building Old Refectory and adjacent spaces, including upgraded WC facilities, staff office space, and roof lighting to provide a new learning space.”**

3.11 On 18 September 2019, an application for listed building consent was granted under application ref. 2019/0067/L for the following:

**“Internal alterations to create a new internal opening, doorway and access route between Wilkins building south cloister, Bernard Katz building and Japanese garden.”**

3.12 As can be noted from the relevant planning history, various refurbishments works have been undertaken to the Wilkins Building over recent years.

## **4 The Proposed Development**

- 4.1 This section of the Town Planning Statement describes the proposed development and sets out the key objectives of the proposal. This section should be read in conjunction with the supporting Design and Access Statement, prepared by Burwell Architects, which is submitted alongside this application for the Council's consideration.

### **Proposed Development**

- 4.2 In 2026, UCL will be celebrating its bicentenary year. To mark this occasion, UCL have identified a number of improvement and refurbishment works and building legacy projects to undertake and complete by the bicentenary year. These projects include the remodelling of the Main Quadrangle, and refurbishment of the Wilkins Building Cloisters and adjacent rooms.
- 4.3 This Application is for detailed planning permission and listed building consent for refurbishment works relating to the Main Quadrangle and Wilkins Building.
- 4.4 The Proposed Development is described in detail in the supporting Design and Access Statement, prepared by Burwell Architects, and our assessment of the key aspects of the design are covered in Section 8 of this Statement.
- 4.5 The Application is being brought forward following detailed pre-application discussions with the London Borough of Camden, Historic England, and other stakeholders. Stakeholders such as the Bloomsbury Association, and Bloomsbury Conservation Area Advisory Committee ('BCAAC') have also been reached out to and will continue to be during determination of the Application.
- 4.6 The Application proposals have evolved over the pre-application consultation period and have been revised to accommodate advice and comments received. The design process has been iterative, taking consultation and analysis from technical assessments into consideration.

### **Main Quadrangle Proposals**

- 4.7 The original geometries of the Main Quadrangle area have been modified over the years, but the current landscaping arrangement has remained unchanged since the 1970's when the Quadrangle was primarily used for car parking. The existing circulation routes and arrangement of grassed areas no

longer provide legible circulation patterns that lead visitors to the main entrances of surrounding buildings.

- 4.8 The proposal comprises the comprehensive remodelling and landscaping of the Main Quadrangle to better reflect the Quadrangle's strategic position as the main entrance to the Bloomsbury Campus. To enable these works, it is proposed to remove the temporary teaching facility which was installed in July 2017 and currently has permission to stay in place until July 2025 (ref. 2021/6197/P).
- 4.9 The proposed remodelling of the Main Quadrangle presents an opportunity to reinforce the arrival experience, improve circulation and provide greater connectivity to the rest of the campus. As part of the works, it is proposed to reinforce desire lines to the primary building entrances to improve connectivity and echo the original historic layout. One of the key aims of the proposed works is to improve accessibility, as for example less-able users who require step-free access, cannot currently access the Slade building from the main entrance, but instead must enter through a 'back of house' route. The proposed works seek to provide a solution to the accessibility arrangements for the Slade and Wilkins Building by proposing sloped access from the Main Quadrangle. Other accessibility measures are also being proposed, principally relating to the introduction of improving wayfinding and signage located within the landscaped areas.
- 4.10 It is proposed for the Quadrangle to remain a landscaped space which continues to allow for a range of activities and events such as welcome week, graduation balls, student union festivals, cinema/stage screenings, food markets, small performances and gatherings. To support the use of the area during events, lightweight temporary tent structures are proposed to be integrated as part of the overall design. In addition, it is proposed that tiered seating will be built into the planters to provide informal areas of seating which can be used during events.
- 4.11 To support the primary circulation routes, it is proposed to incorporate a comprehensive lighting strategy which has been designed to support daily use and special events, as well as provide suitable lighting at night for safety and security purposes.
- 4.12 As part of the Wild Bloomsbury Campaign, UCL are seeking to improve existing green spaces and create new green spaces where possible. It is therefore proposed to incorporate biodiverse native planting and create habitats and hedgerows through the selection of native species. To accommodate the proposed remodelling works, it is proposed to remove 4 trees and replace them with 9 native trees,

some of which will be 'climate change' trees (species that respond well to climate change and are considered a research and teaching tool).

- 4.13 In terms of transport, the scheme has sought to incorporate a more permanent, high quality cycle parking solution into the main landscaped area, compared to the existing temporary stands that are located within the space. In addition, the proposals are 'car-free', except for two blue-badge bays to meet the necessary requirement for those less able visiting the Site.
- 4.14 Other works forming part of the proposal include the raising of the Slade rooflights within the Main Quadrangle, so they sit align with the raised planters they are located within. In addition, further waterproofing works are proposed to the basement of the Chadwick Building as the opportunity presents itself whilst the re-landscaping is being undertaken.

#### **Wilkins Building Proposals**

- 4.15 The main block of the Wilkins Building, including the Portico, forms a key elevation in the Main Quadrangle area. The ground floor contains two large lecture theatres at either end, Cloisters and various teaching rooms. The central rotunda was previously modified in the 18<sup>th</sup> century and stairs were added to improve access between the ground and first floors. As the building was seriously damaged by bombing in the 1940's, the north and south wings were completely rebuilt.
- 4.16 As part of the Bicentennial works, it is proposed to completely remodel and refurbish the north and south wing Cloisters for use as a flexible space to support events such as welcome week, the student union fair, societies and exhibitions. Following discussions with stakeholders, it became evident that the space could be used as an extension of the various modes proposed in the Main Quadrangle area. To facilitate this approach, the proposal includes the creation of new door openings between the cloisters and adjoining rooms, and a full refurbishment of the spaces including new lightings and fixtures and fittings. This approach will create a highly permeable and free flowing spatial configuration which will contribute to UCL's overall aim to improve connectivity around the campus. The creation of new door openings in this area will be done in a sensitive manner and will respect the building's historic and architectural interest.

- 4.17 To assist in improving the sustainability credentials of the building, it is proposed to replace the existing window glazing in the Cloisters and adjoining rooms with new glazing to improve thermal performance and contribute to the refurbishment of these spaces.
- 4.18 Moreover, it is proposed to include new heat emitters within the Cloisters and adjoining rooms as part of the overall heating strategy for the building. To supplement this, new plant and associated equipment is proposed at roof level to support the heating load requirements.
- 4.19 Alongside this, a new access strategy is proposed to connect between the upper and lower ground floor levels. This will include a new staircase and lift which will connect the levels, providing inclusive step-free connectivity between the Cloisters, the Jeremy Bentham room and the Lower Refectory.
- 4.20 In addition, it is proposed to undertake minor repair, redecoration and 'make good' works throughout the Jeremy Bentham room and Garden room which will both remain as flexible spaces. Similar works are proposed in the Male WC's which can be accessed from the Octagon (centre of the building) via the stairs on route to the Jeremy Bentham room.
- 4.21 For further information on the proposals, please refer to the supporting Design and Access Statement, prepared by Burwell Architects.



## 5 Planning Policy Context

- 5.1 This section of the Town Planning Statement outlines the relevant national, regional and local planning policy guidance documents which the Proposed Development should be assessed against, and the key planning considerations.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.
- 5.3 Planning policy operates at the national, regional and local levels. At a national level, Central Government adopted the NPPF in March 2012. The latest updates to the NPPF were published in December 2023.
- 5.4 The adopted Statutory Development Plan for the purposes of these applications consists of:
- The London Plan (adopted March 2021); and
  - Camden’s Local Plan (adopted July 2017).
- 5.5 In addition, decisions must accord with relevant legislation. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker 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.
- 5.6 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) provides that, with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

### **National policy – National Planning Policy Framework (2023)**

- 5.7 The National Planning Policy Framework (‘NPPF’), which supersedes previous versions from September 2023, July 2021, February 2019, July 2018, and March 2012, sets out the Government’s economic, environment and social planning policies for England and supersedes the vast majority of

Planning Policy Guidance Notes (PPG's) and Planning Policy Statements (PPSs). It summarises in a single document all previous national planning policy advice. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations

- 5.8 The NPPF sets out the Government's requirements for the planning system. It provides a framework within which local people and their accountable councils can produce their own local and neighbourhood plans, which reflect the needs and priorities of their communities. The NPPF is a material consideration in the determination of planning applications.

#### **National guidance – Planning Practice Guidance (as updated)**

- 5.9 In March 2014, the Department for Communities and Local Government ('DCLG') launched the web-based Planning Practice Guidance ('PPG') resource. This aims to provide guidance which is useable in an up-to-date and accessible manner.
- 5.10 The PPG outlines how government planning practice should be followed and interpreted in accordance with the principles of the NPPF. Regarding decision making, the guidelines set out in the PPG are a material consideration and accordingly should carry weight in the determining of planning applications.

#### **Regional planning policy – The London Plan (2021)**

- 5.11 The London Plan (2021) is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas, and forms part of the Statutory Development Plan.
- 5.12 The detailed objectives of the London Plan seek to ensure that London can meet the challenges of economic and population growth; be internationally competitive and successful, deliver diverse, strong, secure and accessible neighbourhoods; be world-leading in improving the environment; and be easy, safe and convenient for everyone to access, jobs, opportunities and facilities.

5.13 The London Plan is supported by guidance, which provides further information about how the London Plan should be implemented. The following Supplementary Planning Guidance ('SPG') / London Planning Guidance ('LPG') documents have been considered as part of this application:

- Accessible London SPG (2014);
- Planning for Equality and Diversity in London SPG (2007);
- Public London Charter LPG (2021);
- Social Infrastructure SPG (2015);
- All London Green Grid SPG (2012);
- Control Of Dust and Emissions in Construction SPG (2014);
- Sustainable Transport, Walking and Cycling LPG (2022); and
- Characterisation and Growth Strategy LPG (2023).

Draft

- Fire Safety LPG (2022).

**Local planning policy – Camden's Local Plan (2017)**

5.14 Camden's Local Plan was adopted on 3 July 2017 and now forms part of the Statutory Development Plan for the borough. The key objectives in the Local Plan seek to create conditions for harnessing the benefits of economic growth, reduce inequality and secure sustainable neighbourhoods.

5.15 Camden's Local Plan is supported by guidance, which provides further information about how the policies in the Local Plan should be implemented. The following Camden Planning Guidance ('CPG') documents have been considered as part of this application:

- Access for All CPG (2019);
- Amenity CPG (2021);
- Biodiversity CPG (2018);
- Design CPG (2021);
- Planning for Health and Wellbeing CPG (2021);
- Public Open Space CPG (2021);
- Transport (2021);
- Trees CPG (2019); and

- Water and Flooding CPG (2019).

### **Emerging Planning Policy**

5.16 Camden is in the process of preparing a new local plan which aims to set out the Council's vision for future development in Camden for the next 15 years. The draft local plan was subject to a Regulation 18 consultation in early 2024, with target adoption due in Summer 2026. Due to the progress of the draft local plan, at this stage limited weight is given to the draft policies when assessing the proposals.

## 6 Planning Policy Considerations

6.1 This section of the Town Planning Statement sets out the key planning considerations that are relevant to this application.

6.2 The key planning considerations that relate to the proposed development are as follows:

- Land use;
- Design and Sustainability;
- Heritage;
- Landscaping, Biodiversity and Trees;
- Lighting;
- Transport;
- Noise; and
- Fire safety.

6.3 Each of the planning considerations listed above have been assessed in the following sections in order to demonstrate how the proposals accord with the relevant national, regional and local planning policies, guidance and material considerations.

## **7 Planning Consideration – Land Use**

- 7.1 This section of the Town Planning Statement assesses the proposal against the relevant national, regional and local planning policies relating to educational provision.
- 7.2 The proposals aim to enhance an existing educational use. Further details on the importance of the proposal with regards to educational use can be found in the supporting Design and Access Statement, prepared by Burwell Architects, submitted as part of this application for the Council’s consideration.

### **Education – Policy Context**

- 7.3 Paragraph 100 of the NPPF states that to ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.
- 7.4 Policy S3 of the London Plan sets out that proposals should ensure there is a sufficient supply of good quality education facilities to meet demand and offer educational choice. The supporting text recognises that higher education is a significant employer and helps the capital to remain globally competitive.
- 7.5 Policy E8 of the London Plan states that the development of higher and further education providers across all parts of London should be promoted. The supporting text paragraph 6.8.4 states that the Mayor supports measures to secure and develop London’s leading role as a centre of higher and further education.
- 7.6 Policy C2 of Camden’s Local Plan states that the Council will work with its partners to ensure that community facilities and services are developed and modernised to meet the changing demands of the community. The policy also states that the Council will support investment plans for educational 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.

## Education – Policy Assessment

- 7.7 UCL continues to be a world-leading university and an attractive destination for both domestic and international students who wish to benefit from its world class teaching and learning facilities. The latest figures published on UCL’s website indicate that there are currently 16,000 staff members and 50,000 students from over 150 different countries. Projections indicate that these numbers will continue to grow.
- 7.8 In order for UCL to accommodate current and future demand, retain and strengthen its position as a leading higher education facility, and continue to make a significant contribution to Camden, London and the UK, it needs to be supported by a high-quality teaching environment which is multi-functional, adaptable and most importantly, fit for purpose.
- 7.9 The proposed refurbishment and improvement works in the Main Quadrangle and Wilkins Building will bring forward a high quality teaching/educational environment which is fit for purpose, adaptable, inclusive, accessible and reflective of UCL’s world class status as a leading University.
- 7.10 UCL has given careful consideration to the comprehensive design and layout of the space, including discussions with various internal stakeholders, so that the proposals assist in meeting the current and future demand requirements of the university.
- 7.11 The proposals being brought forward will also assist in providing social and economic benefits to the local area, by providing high-quality, fit-for purpose, spaces which will improve the visual amenity of the area, as well as accommodate appropriate events which will improve local footfall. Furthermore, by improving the student experience at the University, this will improve the retention and expansion of students at the university which will help socially and economically in the short and long term locally, regionally, and nationally.
- 7.12 In summary, the proposals comprise a high-quality, fit for purpose design which will meet the current and future needs of the university, whilst also assisting to promote social and economic benefits. The proposals therefore comply with the relevant policies at national, regional, and local levels.

## **8 Planning Consideration – Design and Sustainability**

- 8.1 This section of the Town Planning Statement assesses the proposal against the relevant national, regional and local planning policies relating to design and sustainability.
- 8.2 Further details on design and sustainability matters can be found in the supporting Design and Access Statement, prepared by Burwell Architects, submitted as part of this application for the Council’s consideration.

### **Design and Sustainability – Policy Context**

- 8.3 The Government has attached great importance to sustainable development. Paragraph 8 of the NPPF sets out three overarching objectives to support sustainable development. This includes an economic objective to help build a strong, responsive and competitive economy, a social objective to support strong, vibrant and healthy communities and an environmental objective to protect and enhance our natural, built and historic environment.
- 8.4 Paragraph 131 of the NPPF states that good design is a key aspect of sustainable development and helps make development acceptable to communities whilst creating better places for people to live and work.
- 8.5 Paragraph 135 of the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, which will function well over the lifetime of the development, are visually attractive, sympathetic to local character, establish a strong sense of place, optimise the potential of the site, and create places that are safe.
- 8.6 Paragraph 137 of the NPPF stipulates that design quality should be considered throughout the evolution and assessment of a scheme. Early discussions between the applicant, local planning authority and local community is encouraged to ensure that commercial and local interests align.
- 8.7 Paragraph 139 of the NPPF states that local planning authorities should give great weight to outstanding or innovative designs which help to raise the standard of design in the area and are sensitive to local character and the surrounding environment. This is reinforced in the PPG on Design



which states that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in the area.

- 8.8 Policy D4 of the London Plan states that in delivering good design, Design and Access Statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.
- 8.9 Policy D5 of the London Plan states that development proposals should seek to achieve the highest standards of accessible and inclusive design and should be designed to accommodate London's diverse population and to facilitate social interaction and inclusion.
- 8.10 Policy D1 of Camden's Local Plan states that the Council will seek to secure high quality design in development and will require that development proposals respect the local character and context and are inclusive and accessible for all.
- 8.11 Policy CC1 of Camden's Local Plan states that the Council will require all development to minimise the effects of climate change and will encourage all developments to meet the highest environmental standards where possible.

#### **Design and Sustainability – Policy Assessment**

- 8.12 A Design and Access Statement has been prepared by Burwell Architects and is submitted as part of this application for the Council's consideration. The Design and Access Statement has been prepared to supplement the supporting plans and drawings and should be read alongside the other supporting documents.
- 8.13 The design has been discussed in detail throughout the pre-application process and has been developed following extensive engagement with LB Camden, and other relevant statutory consultees including Historic England. Any feedback received during the pre-application process has been carefully considered and incorporated into the proposals where possible.

## Main Quadrangle

- 8.14 As set out within the Design and Access Statement, the proposal for the Main Quadrangle comprises the comprehensive remodelling of the area to better reflect the Quadrangle's strategic position as the main entrance to the Bloomsbury Campus.
- 8.15 As part of the remodelling works, it is proposed to improve circulation and provide greater connectivity around the campus through reinforcing desire lines to primary building entrances. It is considered that this will greatly improve the layout and permeability of the campus.
- 8.16 In accordance with policy, the proposal seeks to achieve the highest standards of accessible and inclusive design. It is proposed to create sloped access to the Slade Building and Wilkins Building to allow wheelchair / less able users to access the building from the Main Quadrangle area. This is considered a significant improvement to the current situation whereby less able users who require step-free access have to enter the Slade Building through a secondary entrance. In accordance with policy, this proposal would allow an inclusive primary access for all users of the building for the Slade and Wilkins Buildings. In addition, appropriate lighting, wayfinding and signage is proposed to improve accessibility and safety for all users of the space.
- 8.17 The proposal seeks to deliver good design that has given careful consideration to both the articulation of the space, but also how the area can suitably meet the needs of multiple uses through a permanent design solution. Raised planters have been proposed which will accommodate soft landscaping and biodiversity enhancements such as biodiverse native planting, and habitat creations. The raised planters have also been designed to provide appropriate tiered seating to foster social interaction and collaboration where possible, whilst also accommodating a range of activities and events including welcome week, graduation balls, student union festivals, cinema/stage screenings, food markets, small performances and gatherings within the landscaped area. To support the use of the area during events, and to provide an increased provision of sheltered areas during the summer months, lightweight temporary tent structures are proposed to be integrated as part of the overall design.
- 8.18 The proposal promotes the use of high-quality materials throughout the design which will help to retain the appearance of the space following high-footfall usage, whilst also providing an improved visual setting for the adjacent listed buildings and the Bloomsbury Conservation in which it is located. The supporting DAS sets out the materiality being proposed, however in certain instances the material

is not yet definitively confirmed, and precedence have been provided as to the considered approach. In such instances, we suggest a suitably worded condition allows for the final material details to be submitted for approved prior to the relevant works being undertaken.

- 8.19 During the development of the proposals, careful consideration has been given to the location of cycle parking, blue badge spaces, power points, servicing, rise inlets etc to make sure the scheme has a comprehensive strategy that meets current and future needs for the Site.

#### Wilkins Building

- 8.20 As set out in the Design and Access Statement, the proposal comprises the comprehensive refurbishment of the Wilkins Building Cloisters and adjoining rooms, Jeremy Bentham room, Garden room and Slade Building.
- 8.21 The proposed works relating to the Cloisters and adjoining rooms will improve the overall layout and functionality of the spaces whilst providing a comprehensive design which is of high quality, and fit-for-purpose to meet the current and future needs of the university and will assist in accommodating a wide range of activities and events which is currently limited. Careful consideration has been given the design of the spaces to make sure they meet the requirements of the users of the spaces, whilst also aiming to be sympathetic to the heritage significance of the listed building.
- 8.22 The approach of improving accessibility and an inclusive design feeds in from the Main Quadrangle. The introduction of a new lift and stair will improve accessibility for all users across several levels within the building. The overall approach to levels across the proposal will also allow for suitable access from the Main Quadrangle to the Wilkins Terrace and Japanese Garden, which are located to the rear of the Wilkins Building, which is a notable improvement for those less able users.
- 8.23 High quality design has been considered throughout the proposed refurbishment works as shown within the supporting DAS. Not only does this relate to the main works proposed within the Cloisters adjacent rooms, careful consideration has also been given to other rooms, including the Jeremy Bentham Room, which require an element of repair/redecoration work to be undertaken so a comprehensive high quality finish can be noted when using the various spaces.
- 8.24 Consideration has also been given to sustainability principles to ensure that the highest environmental standards have been incorporated into the design where possible. New glazing is proposed to the

existing windows within the cloisters to increase their thermal performance, whilst also maintaining their functionality of providing a natural method of ventilation.

8.25 Furthermore, new heat emitters are proposed within the cloisters and adjoining rooms to improve the overall heating strategy for the building. The proposed heating will be accommodated through the installation of new plant on the roof which will be screened in a high-quality material which matches the existing materiality on the roof. Whilst the ASHP enclosure will be read from the rear of the Site, it has been positioned to minimise visual impact and to be aligned with other similar materiality along the roofscape.

8.26 Overall, the proposed development has brought forward a comprehensive strategy which provides a high-quality, fit-for-purpose space, which provides notable improvements to accessibility, inclusive design, and visual appearance to the Site. With the above in mind, it is considered that the proposal accords with policies D3, D4 and D5 of the London Plan, and policies D1 and CC1 of Camden's Local Plan.

## 9 Planning Consideration – Heritage and Public Benefits

- 9.1 This section of the Town Planning Statement assesses the proposal against the relevant national, regional and local planning policies relating to Heritage.
- 9.2 Further details on heritage matters can be found in the supporting Heritage Statement, prepared by Alan Baxter, submitted as part of this application for the Council’s consideration.

### Legislative Context

- 9.3 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that decision makers are required to have “special regard” to the desirability of preserving listed buildings and their settings.
- 9.4 Further, Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that, in respect of development affecting conservation areas, “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”.

### Heritage – Policy Context

- 9.5 The Government has attached great importance to conserving and enhancing the historic environment in the NPPF. Paragraph 200 of the NPPF states that in determining applications, local planning authorities should require an application to describe the significance of any heritage assets affected, including any contribution made by their setting.
- 9.6 Paragraph 203 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 vitality; and
  - The desirability of new development making a positive contribution to local character and distinctiveness.

- 9.7 Paragraph 205 of the NPPF states that in assessing impact, the more important the asset, the greater the weight should be given to its conservation. It notes that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.
- 9.8 Paragraph 208 of the NPPF states that where a development proposal will lead to '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, where appropriate.
- 9.9 Policy HC1 of the London Plan states that development proposals affecting heritage assets, and their settings, should conserve their significance by being sympathetic to the asset's significance and appreciation within their surroundings.
- 9.10 Policy D2 of Camden's Local Plan states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

#### **Heritage – Policy Assessment**

- 9.11 A Heritage Statement has been prepared by Alan Baxter and is submitted as part of this application for the Council's consideration. The purpose of the report is to assess the impact of the proposed works on the significance of the Grade I listed Wilkins Building, Slade Building and Chadwick Building, and Grade II listed Main Quadrangle Observatories, and the character, appearance and significance of the Bloomsbury Conservation Area.
- 9.12 As set out within the Heritage Statement, the areas of significance are considered to be as follows:
- Exterior of the Wilkins Building – The front elevation including the dome can be seen from Gower Street and is therefore considered of social, historic and architectural significance. The copper roof and Portland stone materials are also considered to be of significance to the front elevation (highest significance). As the rear includes the addition of twentieth and twenty-first century buildings to the east, the rear of the building is considered to be less dominant (moderate significance).
  - The Great War memorial – The memorial is carved centrally into the plinth of the Portico (highest significance).

- First and second floors of the Wilkins Building – The first floor octagon and surrounding space (Flaxman Gallery) are the only surviving suite of rooms from Wilkin’s original scheme (highest significance). The impact of Donaldson’s staircase between the octagon and the library is diluted by other staircases in the same circulation core and Burwell’s staircase is representative of the University’s major intervention in the early twenty-first century (both of moderate significance).
- Ground floor and basement of the Wilkins Building – The ground floor and adjacent spaces remain legible, with most of the nineteenth century fabric removed and rebuilt in the post-war period. The north and south cloisters are considered to be of moderate significance. The basement contains the refectory and other rooms which are contemporary and do not contain any historic detailing (neutral significance).
- The Quadrangle – The Quadrangle is considered of critical importance to the setting of the Wilkins Building and other listed buildings that enclose it. It is considered as the historic and present focal point for student activity (highest significance). The flat lawns and paths in this area are considered to be of neutral significance and the York pavilions are of low significance as they have little historic interest.

9.13 The improvements proposed to the Main Quadrangle, including the removal of areas of existing hard landscaping and the temporary pop up building are considered to be a notable benefit of the scheme and will improve the quality of the quadrangle, which the Assessment concludes will enhance the character and appearance of the Bloomsbury Conservation Area. The Assessment identifies that the removal of the bollards and lamp posts will have a degree of harm, which is less than substantial, on the setting of the Chadwick Building and character of the Bloomsbury Conservation Area.

9.14 As set out in the Assessment, there are a several elements of the proposed works which are considered to have no, or neutral impact, to the significance of some listed buildings (Wilkins Building and Slade Building), although certain elements of the proposal are considered to have an element of harm to the setting of other listed buildings (Chadwick Building and Main Quadrangle Observatories). Overall this is considered to fall into the category of ‘less than substantial’.

- 9.15 As set out within the NPPF, where a proposal would lead to 'less than substantial' harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal.
- 9.16 Although there are notable interventions proposed, the comprehensive proposals will bring forward a space which is better used, better appreciated, and which will function more efficiently to support the various events and uses within the building and main quadrangle. Furthermore, the approach to introducing step-free access will improve accessibility to some of the significant areas of the Wilkins Building and will be a significant heritage and public benefit.
- 9.17 Careful consideration has also been given to propose interventions to areas of less significance where possible. This is noted for example in the installation of the lift and stairs which have been located to mitigate any harm and preserve some of the most significant aspects of the Wilkins Building.
- 9.18 The early removal of the temporary building located within the Main Quadrangle, and comprehensive re-landscaping of the main quadrangle, will also enhance the setting of the adjacent listed buildings.
- 9.19 Furthermore, the comprehensive introduction of improved lighting, and thermal management will collectively improve the quality of the spaces and provide a neutral impact on the architectural and historical significance of the Site.
- 9.20 The investment across the Site would also bring about job creation during the construction period, as well as providing a much-improved sense of place and identity.
- 9.21 The principal public benefits are set out as follows:
- Retaining, repairing and enhancing historical elements of the listed building on Site;
  - A design which provides fit-for-purpose spaces to meet the current and future needs of students and staff;
  - Enhancing UCL's status as a world-class University offering opportunities for students from around the world;
  - Significant improvements to the public realm;
  - Significant improvements to the accessibility and usability of the spaces for all users;
  - A comprehensive design strategy and removal of ad-hoc installations; and



- Removal of the temporary pop up building which has a detrimental impact on the setting of the listed building and the character and appearance of the conservation area.

9.22 When considering the scheme as a whole, it is considered that the 'less than substantial harm' that has been identified to the significance of the Grade I listed Chadwick Building, Grade II listed Main Quadrangle Observatories and Bloomsbury Conservation Area, is outweighed by the public benefits arising from the proposals which are considered to enhance the setting of the character and appearance of the listed buildings and the wider Conservation Area.

9.23 Therefore, the proposals accord with Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the relevant paragraphs of the NPPF, Policy HC1 of the London Plan and Policy D2 of Camden's Local Plan.

## **10 Planning Consideration – Landscaping, biodiversity and trees**

- 10.1 This section of the Town Planning Statement assesses the proposal against the relevant national, regional and local planning policies relating to landscaping, biodiversity and trees.
- 10.2 Further details on landscaping, biodiversity and trees matters can be found in the supporting Design and Access Statement, prepared by Burwell Architects, Ecological Impact Assessment (including BNG report), prepared by Tyler Grange, and Arboricultural Assessment, prepared by BDP. These documents are submitted as part of this application for the Council’s consideration.

### **Landscaping, biodiversity and trees – Policy Context**

- 10.3 Schedule 7(A) of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021) makes provisions for the grant of planning permission to be subject to a condition to secure the biodiversity net gain objective. The legislation states that the biodiversity net gain objective will be met only if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least 10%.
- 10.4 Paragraph 20 of the NPPF encourages strategic polices to consider the conservation of the natural, built and historic environment, including landscapes, green infrastructure and planning measures to address climate change mitigation and adaptation.
- 10.5 Paragraph 135 of the NPPF states that planning policies and decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
- 10.6 Paragraph 136 of the NPPF states that trees can make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change.
- 10.7 Paragraph 186 of the NPPF states that development should seek to conserve or enhance biodiversity, or where appropriate, integrate biodiversity as part of the design.
- 10.8 Policy G1 of London’s Plan states that green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits. Part D of the policy states that development

proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

- 10.9 Policy G5 of the London Plan states that development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- 10.10 Policy G6 of the London Plan states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. The policy states that this should be informed by the best available ecological information and addressed from the start of the development process.
- 10.11 Policy G7 of the London Plan states that development proposals should ensure that, where possible, existing trees of value are retained. The policy states that if planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed.
- 10.12 Policy A3 of Camden's Local Plan states that the Council will seek to assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed.
- 10.13 Policy A3 of Camden's Local Plan also states that the Council will seek to protect and resist the loss of trees of significant amenity, historic, cultural or ecological value, including proposals which may threaten the continued wellbeing of such trees.

#### **Landscaping and Biodiversity – Policy Assessment**

- 10.14 An Ecology section has been included in the supporting Design and Access Statement, prepared by Burwell Architects, and is submitted as part of this application for the Council's consideration.
- 10.15 As set out within the Ecology section of the Design and Access Statement, the remodelling of the Main Quadrangle presents an opportunity to celebrate new approaches for biodiverse climate-adapted

public realm spaces. This includes the opportunity for the Main Quadrangle to become a ‘living lab’ and integrated research and teaching environment for ecology and biodiversity.

10.16 The proposed design includes the following biodiversity enhancement measures:

- Horizontal edging for ground nesting bees;
- Structural habitat using circular economy principles;
- Sweet chestnut log mulch;
- Vertical log piles (buried within the hedges);
- Surface water management – rills / rainwater collecting;
- Biodiverse native planting;
- Hedgerows;
- Replacement of the 4 trees removed with ‘climate control’ trees – Species that respond well to climate change, as a research and teaching tool.

10.17 An Ecological Impact Assessment (including BNG report), prepared by Tyler Grange, is submitted as part of this application for the Council’s consideration. The purpose of the Ecological Impact Assessment is to set out the ecological features present, identify any potential ecological issues or opportunities that may arise and outline any mitigation measures where appropriate, in order to achieve the statutory 10% Biodiversity Net Gain requirement.

10.18 The report concludes that no impacts are anticipated on any designated or non-statutory sites, as long as best practice and guidance is followed to control impacts via air, run-off and other pollutants. In addition, the report concludes that the development will primarily affect habitats of negligible ecological importance. The report also outlines that the loss of four trees of local ecological importance will be compensated for by the planting of ten small trees, providing additional opportunity to enhance biodiversity, achieve a net gain and accord with policy.

10.19 The proposal will result in a gain of 0.16 habitat units and 0.04 hedgerow units. The report lists this as a percentage gain of 10.77% in habitat units and 21.44% in hedgerow units. This meets the requirements of the Biodiversity Net Gain objective set out in Schedule 7(A) of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021).

10.20 The Proposed Development will bring forward a number of biodiversity enhancements to the Site, as well as achieving the minimum 10% threshold for Biodiversity Net Gain. It is therefore considered that

the proposal accords with policies G6 and G7 of the London Plan, and policy A3 of Camden’s Local Plan.

### **Trees – Policy Assessment**

- 10.21 An Arboricultural Impact Assessment and Method Statement has been prepared by BDP and is submitted as part of this application for the Council’s consideration. The report outlines the findings of a recent survey of all significant trees and groups of trees that may be affected by the development proposals. The report also outlines the best practice methods that will need to be adopted in order to protect trees during the development process. Moreover, the report includes a Tree Constraints Plan, Tree Impacts & Protection Plan, Tree Survey Schedule and Preliminary Arboricultural Method Statement in the Appendix.
- 10.22 The report concludes that no trees within the application site are subject to Tree Preservation Orders (‘TPO’). However, consideration has been given to the fact that the Site sits within the Bloomsbury Conservation Area. Moreover, the report concludes that 3 grade B category trees (moderate quality) and 1 grade C category tree (low quality) will need to be removed in order to facilitate the proposal as they would obstruct the primary circulation route in the Main Quadrangle area. Overall, it is understood that the trees to be removed are of moderate amenity value.
- 10.23 It is proposed to replace the 4 trees being removed with 9 new native species ‘climate control’ trees (species that will respond well to climate change, as a research and teaching tool) in the locations identified in the relevant section of the supporting Design and Access Statement. There will therefore be an overall increase on the number of trees on the Site.
- 10.24 As part of the scheme, consideration has been given to the need to protect the roots of existing trees, through the provision of a Tree Impacts & Protection Plan.
- 10.25 It is therefore considered that the proposal accords with policies G5, G6 and G7 of the London Plan, and policy A3 of Camden’s Local Plan.

## **11 Planning Consideration – Lighting**

- 11.1 This section of the Town Planning Statement assesses the proposal against the relevant national, regional and local planning policies relating to lighting.
- 11.2 Further details on lighting matters can be found in the supporting Lighting Assessment, prepared by BDP, which is submitted as part of this application for the Council’s consideration.

### **Lighting – Policy Context**

- 11.3 Paragraph 191 of the NPPF requires that planning policies and decisions should ensure that new development is appropriate for its location, taking into account the likely cumulative effects. In doing so, the NPPF requires that the impact of light pollution from artificial light is limited for local amenity, intrinsically dark landscapes and nature conservation.
- 11.4 Policy D8 of the London Plan states that lighting, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution.
- 11.5 Policy A1 of Camden’s Local Plan states that the Council will seek to protect the quality of life of occupiers and neighbours and will grant permission for development unless it causes unacceptable harm to amenity. The Council will consider a number of factors, including artificial lighting levels.
- 11.6 Paragraph 6.7 of Camden’s Local Plan states that developments in sensitive areas should employ a specialist lighting engineer (accredited by the Institute of Lighting Engineers) to ensure that artificial lighting causes minimal disturbance to occupiers.

### **Lighting – Policy Assessment**

- 11.7 A Lighting Assessment has been prepared by BDP and is submitted as part of this application for the Council’s consideration. The main aim of the lighting proposal is to harmonise the illuminated effect to all external areas, enhance the arrival experience, illuminate vertical and horizontal surfaces, and upgrade the exterior environment to reflect the applicant’s aspiration to provide a high-quality education destination.

11.8 In accordance with policy, the light intensity and distribution has been carefully considered to ensure that upward light spill is minimised, and that light distribution cut off from luminaires do not result in severe light trespass into neighbouring buildings.

11.9 To protect the quality of life of occupiers and neighbours, the following steps will be undertaken to minimise light pollution and other negative effects:

- Containing uplift lighting to key features only;
- Restricting the tilt angle on any adjustable luminaires to 30 degrees (maximum) to minimise source intensity glare;
- Recessing and integrating low level lighting in-ground where necessary;
- Use of appropriate glare shielding to minimise light source visibility.

11.10 To conclude, the proposed development has carefully considered the potential impact of lighting and has sought to protect the quality of life of occupiers and neighbours where possible. It is therefore considered that the proposal accords with policy D8 of the London Plan, policy A1 of Camden's Local Plan and the relevant guidance set out in Camden's Amenity CPG.

## 12 Planning Consideration – Transport

- 12.1 This section of the Town Planning Statement assesses the proposal against the relevant national, regional and local planning policies relating to transport.
- 12.2 Further details on transport matters (cycle parking/disabled car parking) can be found in the supporting Design and Access Statement, prepared by Burwell Architects, which is submitted as part of this application for the Council’s consideration.

### Transport – Policy Context

- 12.3 Chapter 9 of the NPPF outlines aims for a transport system balanced in favour of sustainable transport modes, to give people a real choice about how they travel and encourages solutions which support reductions in greenhouse gas emissions and reduce congestion.
- 12.4 Paragraph 115 of the NPPF is clear that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.
- 12.5 Paragraph 116 of the NPPF requires development to give priority to pedestrians and cycle movements, address the needs of people with disabilities, create places that are safe, secure and attractive and allow for the efficient delivery of goods and access by service and emergency vehicles.
- 12.6 Policy T5 of the London Plan seeks to ensure that development proposals should remove barriers to cycling and create a healthy environment in which people opt to cycle. In order to ensure this is achieved, development proposals should secure the provision of appropriate level of cycle parking (as set out in Table 10.2 of the London Plan) which should be fit for purpose, secure and well located.
- 12.7 Policy T6 of the London Plan states that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well connected by public transport, with developments elsewhere designed to provide the minimum necessary parking. Part E of the policy states that the appropriate level of disabled persons parking for Blue Badge holders should be provided.



12.8 Policy T1 of Camden’s Local Plan states that the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough. The policy also states that development proposals should seek to ensure a safe and accessible environment for cyclists and provide for accessible, secure cycle parking facilities exceeding minimum standards (as set out in Table 6.3 of the London Plan).

12.9 Policy T2 of Camden’s Local Plan states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. The policy states that the Council will limit on-site parking to spaces designated for disabled people where necessary and/or essential operational/servicing.

#### **Transport – Policy Assessment**

12.10 A transport section has been included in the Design and Access Statement, prepared by Burwell Architects, and submitted as part of this application for the Council’s consideration. As requested by LB Camden at pre-application stage, this section includes cycle and car parking details.

12.11 The Site has a public transport accessibility level (PTAL) of 6b, which is the highest achievable rating. This rating can be attributed to the site’s close proximity to a number of underground train stations, including Euston / Euston Square, Russell Square, Goadge Street, Warren Street and Kings Cross & St Pancras Internal Station. There are several bus routes serving the site, notably from Gower Street, Euston Road and Woburn Place.

12.12 The Main Quadrangle has been designed to promote use by both pedestrians and cyclists, with clear circulation routes and provision of secure cycle parking. Cycle storage has been incorporated into the proposal either side of the Main Quadrangle adjacent to the Slade Building and South Wing. The cycle storage will be visually screened by hedging and in a manner that is sympathetic to the setting and special significance of adjacent listed buildings.

12.13 The existing Site provides a limited number of cycle spaces pepper potted across the Main Quadrangle with no clear strategy or wayfinding to meet the demands of students or staff. The proposals do not create new floorspace and therefore do not trigger the requirement for assessing the minimum cycle parking standards within regional and local policy. However, UCL have carefully considered the current and future needs of students and staff and have sought to address this need in the proposals.

Therefore, a total of 134 cycle parking spaces and 7 cycle accessible spaces are proposed in the Main Quadrangle with careful consideration also given to the types of stands provided.

- 12.14 Although the proposals promote a 'car-free' development, 2 accessible car parking spaces are provided adjacent to the Chadwick Building and North-West wing, near the Main Quadrangle entrance. The 2 accessible car parking spaces replace the 2 existing car parking spaces currently located either side of the Wilkins Building Portico to improve functionality of the Main Quadrangle without undermining its accessibility by those less able. The report outlines that only designated vehicles will be allowed on site, including fire tenders, refuse vehicles (entering the main entrance only) and blue badge holders.
- 12.15 Overall, the proposal seeks to promote sustainable modes of transport, whilst also providing safe, secure facilities for those users walking and cycling to the Site. It is therefore considered that the proposed development accords with policies T5 and T6 of the London Plan, and policies T1 and T2 of Camden's Local Plan.

### **13 Planning Consideration – Noise**

13.1 This section of the Town Planning Statement assesses the proposal against the relevant national, regional and local planning policies relating to noise.

13.2 Further details on acoustic matters can be found in the supporting Noise Assessment, prepared by BDP, which is submitted as part of this application for the Council’s consideration.

#### **Noise – Policy Context**

13.3 Paragraph 191 of the NPPF requires that planning policies and decisions should ensure that new development is appropriate for its location, taking into account the likely cumulative effects. In doing so, the NPPF requires that the potential adverse impacts result from noise is mitigated and reduced where possible.

13.4 Policy D13 of the London Plan states that development proposals should manage noise and other potential nuisances by exploring mitigation measures early in the design stage and separating new noise-sensitive development where possible.

13.5 Policy D14 of the London Plan states that in order to reduce, manage and mitigate noise, development proposals should seek to manage noise by avoiding significant adverse noise impacts on health and quality of life, and mitigating and minimising the existing and potential adverse impacts of noise where possible.

13.6 Policy A1 of Camden’s Local Plan states that the Council will seek to protect the quality of life of occupiers and neighbours and will seek to ensure that the amenity of communities, occupiers and neighbours is protected and will require mitigation measures where necessary. In this regard, the Council will consider noise and vibration levels, amongst other factors.

13.7 Policy A4 of Camden’s Local Plan states that the Council will seek to ensure that noise and vibration is controlled and managed, and will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity.

## Noise – Policy Assessment

- 13.8 A Noise Impact Assessment has been prepared by BDP and is submitted as part of this application for the Council’s consideration. The Noise Impact Assessment has been prepared to identify the external plant noise limits to enable compliance with LB Camden’s noise criteria for plant and equipment. The report also identifies the entertainment noise limits which are necessary to enable compliance.
- 13.9 The Assessment assesses noise sources from entertainment noise generated from the development, and noise generated from new building services plant. The report notes that any noise generated from the proposed development will need to be controlled to prevent the nearest noise sensitive receptors from being subjected to excessive noise levels.
- 13.10 The nearest noise sensitive receptors are identified as follows:
- The existing office buildings to the north of the proposed development site;
  - The hospital buildings to the west of the proposed development site;
  - UCL halls of residence to the south of the proposed development site; and
  - Residential dwellings beyond the receptors identified above.
- 13.11 The relevant sites have been identified in figure 1 of the supporting Noise Impact Assessment.
- 13.12 To minimise adverse impact from entertainment noise generated by the proposed development, the Assessment has set out maximum noise limits which must be adhered to for both day-to-day operation music, and also music for less frequent events. It is suggested the measures for managing the thresholds should form part of an Operational Management Plan which we consider can be agreed to via a suitably worded condition.
- 13.13 The assessment has also taken consideration of the proposed provision of external plant on the roof and the associated enclosure and has concluded that the resulting noise level will comply with the Council’s acoustic threshold level.
- 13.14 In summary, the Assessment demonstrates that with the inclusion of appropriate measures, the proposed development can meet the required noise criteria levels set by the Council. It is therefore

considered that the proposed development accords with policies D13 and D14 of the London Plan, and policies A1 and A4 of Camden's Local Plan.

## **14 Planning Consideration – Fire Safety**

14.1 This section of the Town Planning Statement assesses the proposal against the relevant national, regional and local planning policies relating to fire safety.

14.2 Further details on fire matters can be found in the supporting Fire Strategy, prepared by Bureau Veritas, which is submitted as part of this application for the Council’s consideration.

### **Fire Safety – Policy Context**

14.3 Policy D5 of the London Plan states that development proposals should achieve the highest standards of accessible and inclusive design. Part B of the policy states that development proposals should be designed to incorporate safe and dignified emergency evacuation for all building users.

14.4 Policy D12(A) of the London Plan states that all development proposals must achieve the highest standards of fire safety and ensure that they are designed to incorporate appropriate features which minimise the risk of fire spread and reduce the risk to life and serious injury in the event of a fire. The policy also states that proposals must provide suitable and convenient means of escape and an associated evacuation strategy for all building users.

14.5 Policy C6 of Camden’s Local Plan states that the Council will expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.

### **Fire Safety – Policy Assessment**

14.6 A Fire Strategy has been prepared by Bureau Veritas and is submitted as part of this application for the Council’s consideration. The purpose of the report is to demonstrate compliance with policies D5 and D12(A) of the London Plan, and policy C6 of Camden’s Local Plan. As the proposal is not considered as major development, policy D12(B) of the London is not applicable.

### Main Quadrangle

- 14.7 As the Main Quadrangle is an outdoor space, it is considered that this area sits outside of the scope of requirements set out in the Building Regulations (2010). However, as outlined in the accompanying Fire Strategy, fire safety and evacuation has been considered for all building users.
- 14.8 The Fire Strategy concludes that the proposed works would not negatively affect the existing fire vehicle access to surrounding buildings and is also not considered to worsen the existing condition. To achieve the highest standards of fire safety (in accordance with policy), dry risers will be installed to provide additional hose coverage inside surrounding buildings.
- 14.9 The existing hydrant located in the middle of the Main Quadrangle area will be retained and will remain accessible at all times.
- 14.10 It is therefore considered that suitable fire safety measures have been proposed for the safety of all users of the Main Quadrangle area.

### Wilkins Building

- 14.11 The Fire Strategy outlines that as the proposed works will not increase the number of people present in the premises, no updated means of escape sizing analysis has been deemed necessary. The report sets out that the evacuation strategy will be simultaneous and therefore all occupants will escape at the same time upon detection of fire.
- 14.12 In accordance with policy, a suitably sized platform lift will be provided in the new stair core allowing for safe and dignified emergency evacuation for all building users, including those less able, who will require step-free access from the building in the event of an emergency. This is considered to be an improvement to the existing accessibility arrangements in the building, therefore demonstrating that accessible and inclusive design has been considered.
- 14.13 Overall, careful consideration has been given to fire safety measures when developing the proposed design and appropriate strategies have been proposed. It is therefore considered that the proposed development accords with policies D5 and D12(A) of the London Plan, and policy C6 of Camden's Local Plan.

## 15 Conclusions

- 15.1 UCL has identified a number of improvement and refurbishment works, and building legacy projects to undertake and complete by the bicentenary year. The focal point for the bicentennial year will be the significant refurbishment works in the Main Quadrangle and Wilkins Building which seek to improve the educational space on campus and better reflect the University's world class status as a leading University.
- 15.2 The Application is being brought forward following detailed pre-application discussions with the London Borough of Camden, Historic England, and other stakeholders.
- 15.3 The proposed development comprises works to the Wilkins Building and the Main Quadrangle within the heart of the UCL Bloomsbury Campus. These proposed works will promote significant improvements to the functionality, useability, and accessibility of the space, whilst also enhancing the setting of the listed buildings, and the character and appearance of the conservation area.
- 15.4 The Proposed Development will bring forward a number of public benefits which include:
- Retaining, repairing and enhancing historical elements of the listed building on Site;
  - A design which provides fit-for-purpose spaces to meet the current and future needs of students and staff;
  - Enhancing UCL's status as a world-class University offering opportunities for students from around the world;
  - Significant improvements to the public realm;
  - Significant improvements to the accessibility and useability of the spaces for all users;
  - A comprehensive design strategy and removal of ad-hoc installations; and
  - Removal of the temporary pop up building which has a detrimental impact on the setting of the listed building and character and appearance of the conservation area.
- 15.5 This Town Planning Statement has assessed the proposals within the legislative framework, having regard to the Development Plan and relevant guidance at national, regional and local level.



15.6 Overall, it is considered that the proposed development accords with the relevant provisions set out in Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the National Planning Policy Framework, London Plan and Camden’s Local Plan. On this basis, it is considered that full planning permission and listed building consent should be granted accordingly without delay.