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Our ref: **LEOL/PIR/BGI/U0028646**
Your ref: **PP-13548818**

12 November 2024

36-38 Gordon Square, London, WC1H 0PD
Planning (Listed Building and Conservation Areas) Act 1990 (as amended)
Town and Country Planning Act 1990 (as amended)
Application for Planning Permission and Listed Building Consent

On behalf of our client, University College London, we write to submit an application for planning and listed building consent for accessibility improvements to 36-38 Gordon Square, London, WC1H 0PD.

Planning permission is sought for:

“Installation of external platform lift, alterations to front railings, widening and replacement of external front door, levelling of rear courtyard area and associated works.”

Listed Building consent is sought for:

“Installation of external platform lift, alterations to front railings, widening and replacement of external front door and levelling of rear courtyard area, and internal works including damp proofing at lower ground floor level, the widening and replacement of doors at ground floor level, and other associated works.”

Site and Surroundings

The Site comprises three adjoining Grade II listed townhouses, forming part of a wider Georgian terrace which extends the east side of Gordon Square. The use of the Site is educational (Class F1), and it occupied by the UCL Political Sciences Department. Surrounding buildings are predominantly educational and form part of the wider UCL Campus.

The Site is Grade II listed. It is listed under the following entry *‘Numbers 36 and 46 and attached railings and wall on Endsleigh Place return screen wall linking number 36 Tavistock Square.’* It is also located within the Bloomsbury Conservation Area, and within a Protected Vista: Greenwich Park Wolfe statue to St Paul’s Cathedral.

The Site has a Public Transport Accessibility Level (PTAL) of 6b (Excellent). Russell Square and Euston underground, overground and railway stations are also within a short walking distance. There are also a number of bus routes serving the area.

Relevant Planning History

A full review of the planning history for the Site has been undertaken using the records on Camden's online planning register. The relevant planning history for the Site is set out below.

On the 21 May 2024, planning permission (ref. 2024/1300/P) was granted for the "Installation of external platform lift, new gate in front railings, replacement front door, replacement of door and window at lower ground floor and lowering of rear courtyard area."

On the 21 May 2024, listed building consent (ref. 2024/1515/L) was granted for the "Installation of external platform lift, new gate in front railings, replacement front door, replacement of door and window at lower ground floor and lowering of rear courtyard area; internal alterations at lower ground and ground including the widening of doors, and other associated works."

On the 26 June 2019, planning permission (ref. 2019/2941/P) was granted for the "**Refurbishments and repairs to university buildings (use class D1) including the reinstatement of front door to no.37, replacement of two windows with one to rear elevation, installation of roof guard to no. 36, removal of lean-to addition to rear of no. 38 and replacement window and relandscaping of rear gardens.**"

On the 26 June 2019, listed building consent (ref.2019/3042/L) was granted for the "**Refurbishment of GII properties including external alterations such as reinstatement of the front door to no.37; replacement of windows to rear elevation and repairs to facades and roof and installation of roof guard to no.36. Additional internal alterations including demolition of party wall to LGF of nos. 36-37; layout changes; new lighting strategy and general refurbishment throughout.**"

The Proposal

As noted in the planning history section, the building was subject to recent refurbishment and as part of the refurbishment works, a number of accessibility improvements were secured throughout the building, including the provision of accessible toilets and the widening of doorways at lower ground floor level.

Despite these works being implemented, UCL found that there were still barriers for all to access particularly due to the lack of step free access to the building. As such in March this year, an application for planning and listed building consent was submitted and approved for works to secure further accessibility improvements. These works included a platform lift, the widening of internal doorways at ground floor level and the levelling of the rear courtyard area to provide an accessible link between the Political Sciences buildings. UCL are now looking to make some changes to the previously approved plans.

External

The primary entrances to the Site are raised from the Gordon Square Street level and therefore those accessing the building are required to use a stepped access. Whilst the Site also benefits from an additional entrance on Endsleigh Place, this is also accessed via steps from the pavement, and access through this door is made more difficult by the fact that there is no landing area.

Whilst the installation of a platform lift to the front of the Site was proposed under the previous planning and listed building consent application, changes are now sought to the design. As before, the platform lift would be located at street level, behind the railings, but unlike the previous design would operate so to access the raised ground floor level only. Furthermore, the proposed platform lift would now sit on galleys brackets which would sit within the basement lightwell. In order to enable access to the lift from street level and raised ground floor level, some of the front railings are proposed to be carefully removed and securely stored on Site, allowing for potential reuse at a later date. Two new glazed gates with railings are proposed to be instated where the existing railings are to be removed.

Furthermore, and in order to ensure appropriate wheelchair access to the building, the front entrance door to no. 37 is proposed to be widened. The door details are proposed to be replicated, so to ensure that the character of the building is not affected. This change was approved under the previous planning and listed building consent application.

As previously noted, the Site is occupied by the Political Sciences Department, and this department also occupies 29-30 Tavistock Square which is directly to the rear of the Site. At present there is an opening to the rear of no. 38 Gordon Square, which provides a physical link between the two buildings. Whilst this link exists, it requires the negotiation of two sets of steps externally in the courtyard and has restricted width and allowance for wheelchair manoeuvrability. It is therefore proposed to alter the terrace area to the rear of 38 Gordon Square to allow for level access between the two Political Sciences buildings. As the rear terrace has been built up, the proposal involves the removal of the raised concrete area, rather than any excavation. This change was also approved under the previous planning and listed building consent application.

Internal

In order to ensure wheelchair access throughout the ground floor, eight door openings are proposed to be widened and the doors replaced. Through pre-application discussions with the Camden Design and Conservation Officers, the number of doors being altered has been reduced just to the areas where further accessibility improvements are required based on the ongoing needs for users of the building. Whilst the majority of doors are modern, three are historic (albeit subject to some alteration) and the intention is to replace these with doors of an identical design. In terms of the door frames, a number of the openings have detailed architraves which would also need to be altered with the widening of the openings. The intention is to retain as much of the original architrave as possible and where required, install new architrave detailing to replicate the existing.

There is an accessible WC to the rear of 36 Gordon Square, which is accessed via a hallway which has detailed historic tiling. Due to widening of the doorway in order to access the WC, an element of the tiling will need to be altered and extended. The new tiling is proposed to be replicate the existing tiling and pattern.

A tea point and kitchenette is also proposed to be provided at ground floor level for the use of students and staff.

All of the above internal changes were considered acceptable under planning permission ref. 2024/1300/P and listed building consent ref. 2024/1515/L.

The property currently suffers from damp, and in order to remedy this, a new damp proof course is proposed to be installed at lower ground floor level, combined with a lateral tanking system, incorporating cementitious tanking and waterproof renderings. The process will involve temporarily removing the skirting and plaster up

to 1m, and then injecting the walls to ensure protection. The plaster and skirting will then be reinstated and the surfaces made good.

Local Development Framework

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

The London Borough of Camden's Local Development Framework comprises of the following planning policy documents:

- The London Plan (2021); and
- Camden Local Plan (2017).

The National Planning Policy Framework (December 2023) is a material consideration.

In January 2024, Camden Council commenced a consultation on the draft new Local Plan (Regulation 18 consultation). Paragraph 48 of the NPPF outlines the weight local authorities may give to relevant policies in emerging plans. Given the early stage of the plan, the emerging policies in the new Local Plan are afforded limited weight at this stage and have therefore not been referenced in this assessment.

Statutory Legislation

Statute regarding the heritage environment is relevant to this application. Both the site's historic fabric and the surrounding environment have been carefully considered in the development of the proposals having regard to the statutory legislation below.

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 presenting the building or its setting or features of 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 the conservation area.

Planning Assessment

Design and Heritage

Camden Local Plan Policy D1 seeks to ensure development respects local context and character; preserves or enhances the historic environment and heritage assets; is of sustainable and durable construction; is adaptable to different activities and land uses; comprises details and materials that are of high quality and complement the local character; and is inclusive and accessible for all.

Subparagraph 7.16 of Policy D1 states that any adaptation of existing buildings must respond to access needs whilst ensuring that alterations are sympathetic to the buildings character and appearance.

Camden Local Plan Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, especially the conservation areas and listed buildings. The policy goes on to state that in order to maintain the character of Camden's conservation areas, the Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. The Council will also resist development that would cause harm to the significance of a listed building through an effect on its setting or would cause harm to its special architectural and historical interest.

Subparagraph 7.61 of Policy D2 states that where listed buildings and their approaches are being altered, disabled access should be considered and incorporated. It then states that the Council will balance the requirement for access with the interests of conservation and preservation to achieve an accessible solution.

When developing the proposals, careful consideration has been given to the significance of the heritage asset, and how such proposals will impact on the historic fabric, as well as how it would be considered to impact on the character and appearance of the conservation area.

From a review of the Site, and consideration given in the supporting Design and Heritage Statement, it is considered that some significance can be attributed to the areas where works are proposed, principally the works relating to the external façade and railings, and internal works where historic fabric is altered, for example, historic doors and associated architraves.

As demonstrated in the proposal section, and associated supporting documentation, every effort will be made to make sure that appropriate workmanship and materiality will be used to replicate, or minimise visual impact, on the heritage asset. This is shown through the replacement or addition of new material to match the existing (e.g. new architraves), or the inclusion of new equipment (e.g. platform lift) has been installed to minimise interventions to the historic asset whilst also minimising visual impact on the conservation area.

Based on the works proposed, when harm is attributed to the heritage asset, this is considered to be 'less than substantial'. As set out within the NPPF, where less than substantial harm is attributable to proposals, public benefits should be considered which should outweigh the harm. In this instance, the significant public benefit would be the notable accessibility improvements which would be made not only to this Site, but also through to 29-30 Tavistock Square through the re-landscaping of the rear courtyard. Overall, the improvements will benefit those who require able access to the Site, whilst also promoting inclusivity for all users by maintaining a primary access for all. Such benefits are considered to outweigh the harm caused by the proposals, whilst also promoting accessibility improvements as required by the aforementioned supporting paragraphs of the Camden Local Plan.

When considering the impact on the conservation area, consideration is given primarily to the external works to the Site. As demonstrated in the supporting documentation, proposed external works have been minimised where possible, and have been brought forward to minimise visual impact to the wider area. An example of this is through the addition of railings to the platform lift gates, to try to limit their visual presence. Overall, the proposals are considered to maintain the character and appearance of the conservation area.

In summary, although the proposals are considered to incur some less than substantial harm to the heritage asset, this is outweighed by the public benefit of the accessibility improvements made to the Site. Furthermore, the proposals are considered to maintain the character and appearance of the conservation

area. Therefore, the proposals comply with the NPPF, Policies D1 and D2 of the Local Plan, and Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Accessibility

Camden Local Plan Policy C6 states that the Council will seek to promote fair access and remove the barriers that prevent anyone from accessing facilities and opportunities. They will do that this by expecting all buildings and places to meet the highest practicable standards of accessible and inclusive design so that they can be used safely, easily and with dignity by all; and expect spaces, routes and facilities between buildings to be designed to be fully accessible.

Subparagraph 4.99 of Policy C6 states that the Council will balance the requirement to provide access with the interests of conservation and preservation. They seek sensitive design solutions to achieve access for all, to and within listed buildings, in line with Camden Local Plan Policies D1 and D2.

Currently, wheelchair users are prevented from accessing the building due to the lack of step free access. Whilst internal accessibility improvements have previously been secured, these are limited and largely redundant, due to the lack of step free access. The building therefore currently does not meet the objectives of Policy C6.

The proposed works would help to ensure more inclusive use of the building, providing step free access at ground floor level, improved access internally at this level, and an accessible link between the Political Sciences department buildings.

The proposed works would therefore be consistent with objectives of Local Plan Policy C6.

Educational Use

Local Plan Policy C2 states that Camden will support the investment plans of educational, health, scientific and research bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK.

The proposed accessibility improvements would help to secure a more inclusive environment and would better meet the needs of students and staff at the University. The proposals therefore comply with Local Plan Policy C2.

Conclusion

The proposed development would secure significant accessibility improvements to the benefit of current and future students and staff. Whilst the works would involve internal and external interventions to the listed building, these interventions have been sensitively designed in order to minimise any harmful impacts. Furthermore, where historic features are required to be altered or removed in order to secure the accessibility improvements, these features are proposed to be reinstated to match the existing. Although less than substantial harm is attributed to the proposals, this is outweighed by the significant accessibility benefits that arise.

Whilst the platform lift, and associated works to the front of the building would be visible from the public realm, these have been designed to be discreet in appearance, so as to preserve the character and appearance of the Bloomsbury Conservation Area.

The proposed works therefore comply with Policies D1, D2, C2 and C6 of the Local Plan.

Application documentation

In accordance with the requirements of the London Borough of Camden and as agreed with Officers, the application comprises the following documents:

- Application Form and CIL form, prepared by Gerald Eve;
- Site Location Plan, prepared by Barker;
- Covering Letter, prepared by Gerald Eve LLP;
- Design, Access and Heritage Statement, prepared by Barker; and
- Application Drawings, prepared by Barker.

The planning application fee has been paid online through the Planning Portal.

We trust that the information submitted is sufficient to validate the application. Should you require anything further please contact Paige Ireland [REDACTED] or Ben Gibbs [REDACTED] of this office.

Yours faithfully



Gerald Eve LLP