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Planning and Development
Camden Council
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Our ref: **LEO/SNE/ALA/BGI/U0028996**
Your Ref: **PP-13632822**

19th December 2024

**UCL Institute of Archaeology, 31-34 Gordon Square, London, WC1H 0PY
Planning (Listed Building and Conservation Areas) Act 1990 (as amended)
Town and Country Planning Act 1990 (as amended)
Application for full Planning Permission**

On behalf of our client, University College London (the 'Applicant'), we write to submit an application for full planning permission for accessibility and lighting improvements to the UCL Institute of Archaeology, 31-34 Gordon Square, London, WC1H 0PY (the 'Site').

Planning permission is sought for:

"Installation of a handrail and 2 x 3m high lampposts affixed to an existing ramp, alongside the refurbishment of the entrance staircase."

Site and Surroundings

The Site comprises a 1950s building located on the north side of Gordon Square. The use of the Site is educational (Class F1) and is occupied by the UCL Institute of Archaeology, which is one of the largest centres for archaeology, cultural heritage and museum studies in the UK. The surrounding buildings are predominantly educational and form part of the wider UCL Bloomsbury Campus.

Although the Site itself is not listed, it is located within the Bloomsbury Conservation Area and has many listed buildings nearby. The Grade II listed numbers 36, 46 and 47-53 Tavistock Square are located to the eastern side of Gordon Square. The Grade II listed numbers 1-5, 14, 15, 16-25 and 26 Gordon Square are located on the western side. These buildings all form part of Georgian terraces surrounding Gordon Square Gardens. On the southwestern corner of Gordon Square lies the Grade I listed Church of Christ the King.

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

Relevant Planning History

A planning history search has been undertaken using Camden's planning register to establish a record for the Site. The most relevant planning history has been set out below.

On 2 September 2003, an application for full planning permission (2003/1843/P) was granted for the following:

“The installation of a ramp over a light well to the front to provide disabled access”.

The Proposals

The Applicant seeks to undertake accessibility related works outside the main entrance to the Site.

First, the proposals comprise the installation of a new Kee-Klump type handrail, which will be set 1m in from the existing handrail on the left-hand side. The handrail will be in a powder coated colour RAL 7004 with a matte finish.

Second, it is proposed to install two lamppost each 3m in height, on the existing accessibility ramp located to the east of the entrance. One lamp will be located closer to the entrance of the ramp, by the pavement, and the other will be closer to the building, by the entrance. The lighting features will be made from die-cast aluminium and will be powder coated in RAL 7016 with a marine grade finish. The lighting will have a slimline luminaire featuring innovative optical systems to reduce light pollution.

Third, it is proposed to refurbish the entrance stairs, whereby the marble will have localised repairs, where necessary. It is also proposed to install 50mm nosings to the steps.

These alterations are required so that access to the Site is compliant with Part M of Building Regulations.

Further details can be found in the existing and proposed drawings, prepared by UCL and specifications submitted alongside this application.

Planning Policy Context

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.

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

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

The National Planning Policy Framework ('NPPF') (December 2024) is a material consideration.

In January 2024, Camden Council commenced a consultation on the draft new Local Plan (Regulation 18 consultation). Paragraph 49 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. The Site's surrounding environment has been carefully considered in the development of the proposals having regard to the statutory legislation below.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 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.

When developing the proposals, careful consideration has been given in order to preserve the character and appearance on the conservation area.

The proposed handrail is to match the colour, finish and design of the existing handrail located to the left of the entrance.

The lighting is required to improve visibility to both the entrance and exit of the disabled access ramp, as these are narrow and not lit. The lighting will be focussed on two locations on the accessibility ramp and will not cause any unwanted light pollution to the wider area.

The proposed works and materials have been chosen to maximise the accessibility improvements to the areas in questions, whilst limiting the overall visual impact the additional installations will have on the conservation area.

Overall, the proposals are considered to maintain and preserve the character and appearance of the conservation area. Therefore, the proposals comply with the NPPF, Policies D1 and D2 of the Local Plan, and Section 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.

Currently, those less able are provided access to the Site via the ramp to the right of the entrance. Nonetheless, the ramp is currently not served by any lighting, thus limiting visibility for its users.

Additionally, the existing entrance stairs are very wide, and although they are served by two handrails, these are located on either side of the stairs, therefore there is limited handrail access.

The proposed works would help to ensure a more inclusive use of the building, providing improved step free access at ground floor level and helping to achieve the latest building regulation requirements for accessibility. The proposed works would therefore be consistent with the 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 notable accessibility improvements to the benefit of current and future students and staff. Whilst the handrail and lighting would be visible from the street scene, they have been chosen and designed to be discreet in appearance and luminescence, 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, prepared by Gerald Eve LLP;
- CIL Form, prepared by Gerald Eve LLP;
- Covering Letter, prepared by Gerald Eve LLP;

- Design and Access Statement, prepared by Gerald Eve LLP;
- Site Location Plan, prepared by UCL;
- Existing and Proposed Elevations and Floor Plans, prepared by UCL; and
- Specification Documents.

The requisite planning application fee of £293.00 (plus a £70 admin 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 Arjun Lal (██████████) or Ben Gibbs (██████████) of this office.

Yours faithfully,



Gerald Eve LLP
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