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London Borough of Camden
Planning and Borough Development
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FAO: Edward Hodgson

Our ref: LEOL/SNE/ASI/U0025656

Your ref: PP-13760815 / PP-13760859

28 February 2025

Dear Sir/Madam

**Main Quadrangle and Wilkins Building, Gower Street, WC1E 6BT
Town and Country Planning Act 1990 (as amended)
Planning (Listed Buildings and Conservation Areas) Act 1990
Application for a Minor Material Amendment (S73) and variation of a Listed Building Consent (S19)**

We write on behalf of our client, University College London ('UCL' and 'the Applicant') to submit a minor material amendment application to vary Planning Permission Ref. 2024/3177/P under Section 73 of the Town and Country Planning Act 1990 (as amended). In parallel, an application to amend Listed Building Consent Ref. 2024/3192/L has been submitted under Section 19 of the Planning (Listed Buildings and Conservation Areas) Act 1990 for works at the Main Quadrangle and Wilkins Building, Gower Street, WC1E 6BT ('the Site').

A minor material amendment application (S73) is sought for the following:

“Variation of conditions 2, 6 and 13 pursuant to Planning Permission Ref No. 2024/3177/P for refurbishment and improvement works, including creation of sloped access to the Slade and Wilkins Building, replacement of roof lights on 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. Namely, to retain the existing trees within the central landscaped area, retain a tree in its current position, reduce the number of new trees in the raised planters, amend the design of the raised planters to maintain symmetry across the site and relocate the two disabled parking bays closer to the main entrance.”

A section 19 application is sought for the following:

“Variation of condition 2 pursuant to Listed Building Consent Ref No. 2024/3192/L for refurbishment and improvement works to 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 Chadwick Building, and associated works. Namely, to retain the existing trees within the central landscaped area, retain a tree in its current position, reduce the number of new trees in the raised planters, amend the design of the raised planters to maintain symmetry across the site and relocate the two disabled parking bays closer to the main entrance.”

Site and Surroundings

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.

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.

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.

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

Relevant Planning History

A planning history search has been undertaken using the London Borough of Camden's planning register to establish the planning record at the Site. The Council's planning record indicates that the Site has an extensive planning history which includes previous applications for alteration, refurbishment and improvement works.

The relevant applications have been included below:

On 29 November 2024, an application for full planning permission was granted under application ref. 2024/3177/P for the following:

“Refurbishment and improvement works, including creation of sloped access to the Slade and Wilkins Building, replacement of roof lights on 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.”

On 29 November 2024, an application for listed building consent was granted under application ref. 2024/3192/L for the following:

“Refurbishment and improvement works to 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 Chadwick Building, and associated works.”

On 28 January 2025, a non-material amendment application was granted under application ref. 2025/0139/P for the following:

“Non-material amendment to alter the wording of condition 13 (Biodiversity Net Gain) of planning permission 2024/3177/P dated 29/11/2024 (for: Refurbishment and improvement works, including creation of sloped access to the Slade and Wilkins Building, replacement of roof lights on 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). Namely, changes to the requirements of part C relating to habitat creation and enhancement works.”

An application to discharge condition 13(a) and informatives 4 and 5 was pursuant to application ref. 2024/3177/P was approved on 21 February 2025 under application ref. 2024/5795/06BGP.

Pre-application Advice

A pre-application meeting was held with Edward Hodgson and Rose Todd on 30 January 2025. Officer's understood the reasoning for the proposals and raised no objections to the principle of the proposed amendments, subject to the appropriate evidence being provided at application stage.

Officer's requested that the proposed amendments are formalised under a S73 and S19 application to amend the main permissions set out above.

Proposal

Following a design review, the applicant has continued to explore opportunities to retain the three existing trees on site which were previously approved for removal as part of the wider landscaping works in the Main Quadrangle.

The design team have come up with a solution to allow for the three existing trees to be retained (previously proposed to be removed), to retain another tree in its current location (previously proposed to be relocated), as well as retain some of the replacements trees that were previously proposed to mitigate the loss of the three existing trees.

In summary, the following is proposed:

1. Retention of three trees within the central landscaped area that were approved for removal and retention of one tree in its current position instead of relocation. The total number of new trees in the

raised planters will be reduced to 4 (instead of 9) but will still leave an increase in the number of trees on Site compared to the existing situation. The reduction in the number of new trees takes account of the additional trees being retained and allows for increased spacing between trees and the surrounding buildings.

2. The design of the central raised planters has been amended slightly to maintain symmetry across the Site, whilst also accommodating the retention of two of the trees previously approved for removal and relocation. This design change has also led to the relocation of consented lighting installations.
3. The design of the raised planters towards the main entrance to the Site have also been amended to maintain symmetry across the Site, whilst also accommodating the retention of two of the trees previously approved for removal.
4. Reconfiguration of Dry Riser inlets due to design amendments.
5. The disabled parking bays approved under the Planning Permission, are proposed to be relocated closer to the main entrance to allow for the other amendments mentioned above.

The proposed amendments would help to deliver benefits beyond the permitted scheme including an enhancement in BNG on-site, as well as the retention of existing mature trees.

Please refer to the Design and Access Statement Addendum, prepared by Burwell Architects, for further information on the proposals.

Planning Policy Context

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Accordingly, the proposals are assessed against the policies of the London Plan (2021) and the London Borough of Camden's Local Plan (2017).

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

- National Planning Policy Framework ('NPPF') (2024);
- National Planning Practice Guidance ('NPPG') (as amended); and
- London Borough of Camden's Supplementary Planning Documents.

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

Planning Policy Assessment

Design and Heritage

Policy D1 of Camden's Local Plan sets out that the Council will seek to secure high quality design in development and requires that development respects local context and character.

Policy D2 of Camden's Local Plan sets out that the Council will seek to preserve and where appropriate, enhance heritage assets and their settings, including conservation areas. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits.

The proposal seeks to retain the trees within the central landscaped area and allow sufficient spacing between the new trees and surrounding buildings to ensure that surrounding buildings are not impacted by the amendments. The central raised planters and raised planters near the main entrance will also be amended to ensure that symmetry is maintained across the site. The amendments will seek to secure high quality design and minimise any impact on surrounding buildings and the wider conservation area.

The proposed amendments are not considered to change the identified 'less than substantial harm' that was attributed to the scheme as a whole, and the same public benefits would still be delivered which would outweigh the harm. Furthermore, the proposal is still considered to enhance the character and appearance of the Bloomsbury Conservation Area.

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 D1 and D2 of Camden's Local Plan..

Enhancing Community Facilities

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

The proposed amendments will continue to 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 campus and wider area, as well as accommodate events which will improve local footfall.

Overall, it is considered that the proposed amendments will continue to enhance the existing educational use and would therefore accord with Policy C2 of Camden's Local Plan.

Noise and vibration

Policy A1 of Camden's Local Plan sets out that the Council will seek to ensure that the quality of life occupiers and neighbours are protected from the impact of development. The relevant factors considered include noise and vibration levels, and odour, fumes, and dust.

Policy A4 of Camden's Local Plan sets out that the Council will seek to ensure that noise and vibration is controlled and managed. The Council state that permission will only be granted for noise generating development, including any plant and machinery, where it can be operated without causing harm to amenity.

The proposed amendments to the trees, raised planter beds and disabled parking bays will not impact the noise and vibration levels on site as assessed under the approved scheme. It is therefore considered that there are no changes to the initial Noise Impact Assessment, prepared by BDP, as part of the original application.

Overall, it is considered that the proposed amendments would not impact noise levels and would therefore continue to accord with Policies A1 and A4 of Camden's Local Plan.

Landscaping, biodiversity and trees

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 (BNG) 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%.

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.

In addition, the policy 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.

The proposed amendments will seek to retain three trees within the central landscaped area (previously approved for removal) and retain one tree in its current position instead of relocating it. The total number of new trees in the raised planters will therefore be reduced to four (instead of nine), but will leave an increase in the number of trees on Site compared to the existing situation. The reduction in the number of new trees takes account of the additional trees being retained and allow for increased spacing between trees and surrounding buildings. Please refer to the supporting Arboricultural Impact Assessment and Method Statement Addendum for further information.

A Biodiversity Net Gain Addendum and associated metric has been prepared by Tyler Grange and is submitted as part of this application for the Council's consideration. The addendum note confirms that there is no change to the impacts for designated sites and therefore the original Ecological Impact Assessment remains valid. Moreover, the addendum note confirms that the amendments would result in a gain of 0.13 habitat units (4.87%) and would maintain a gain of 0.04 hedgerow units with all trading rules satisfied, therefore leading to an improvement on biodiversity net gain on the Site compared to the approved scheme. Furthermore, the addendum note confirms that the deficit of 0.14 units has been secured through the purchase of units from a habitat bank to achieve a net gain of over 10%.

In addition, an updated Habitat Management and Monitoring Plan (HMMP) has been submitted to reflect the amended scheme. Subject to the agreement of the HMMP and BNG Addendum as part of this submission, it is considered that the requirements of informatives 4 and 5 of the approved planning permission are still dealt with appropriately. In addition, we suggest that Condition 13 (part a) is amended to be a compliance condition to reflect the approved HMMP under this application.

In considering amendments to existing planning conditions, due to the retention of all existing trees as part of the amended scheme, we suggest that Condition 6 is also amended to remove reference to removal of trees as part of the landscaping proposal.

Overall, the proposed amendments will allow for the appropriate retention of existing mature trees, and overall improvement of biodiversity on-site. Therefore, these amendments are considered an improvement to the approved scheme and will accord with Schedule 7(A) of the Town and Country Planning Act 1990 and Policy A3 of Camden's Local Plan.

Fire safety

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.

The Fire Consultant, Bureau Veritas, has confirmed that the proposed amendments would not impact the original Fire Strategy approved as part of the original application.

Overall, as the proposed amendments would not impact the original fire strategy, it is considered that the proposal accords with Policy C6 of Camden's Local Plan.

Lighting

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.

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.

The Lighting Consultant, BDP, has prepared a Lighting Assessment Addendum note which has been submitted as part of this application for the Council's consideration. As set out in the addendum note, the proposed retention of the four trees has meant that two of the consented lighting columns will need to be relocated away from the trees, two of the spotlights will need to move to the new column positions, the gobo projectors mounted on the columns will need to be moved to the trees and one additional spotlight will need to be added to those positions to ensure that the uniformity of the curved path lighting is maintained.

With the above in mind, the Lighting Consultant has confirmed that the proposed amendments would not adversely impact the approved lighting strategy.

Overall, as the proposed amendments would not adversely impact the original lighting strategy, it is considered that the proposal accords with Policy A1 of Camden's Local Plan.

Transport

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).

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.

The proposed amendments seek to relocate the two accessible parking bays (previously approved) closer to the main entrance of the campus to accommodate the tree and raised planter amendments set out above.

For the avoidance of doubt, please note that the number of accessible parking bays will not change. Please refer to the Design and Access Statement Addendum, prepared by Burwell Architects, for further information.

Overall, as the proposed amendments would not change the number of accessible parking bays, it is considered that the proposal accords with Policies T1 and T2 of Camden's Local Plan.

Structural and Civils

The Structural and Civils Consultant, BDP, have confirmed that there will be no structural impact associated with the proposed amendments. The conclusions set out in the original Civils and Structural Design Report therefore remain valid.

Conclusion

In conclusion, it is considered that the proposed development complies with Policies D1, D2, C2, C6, A1, A3, A4, T1 and T2 of Camden's Local Plan, and Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

We therefore consider that the proposal accords with the Development Plan and should therefore be determined positively without delay.

Application documentation

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

- Application form, prepared by Newmark;
- Covering Letter, prepared by Newmark;
- CIL Additional Information form, prepared by Newmark;
- Site Location Plan, prepared by Burwell Architects;
- Consented and Proposed Plans, prepared by Burwell Architects;
- Design and Access Statement Addendum, prepared by Burwell Architects;
- Arboricultural Report Addendum, prepared by AoL;
- BNG Report Addendum and associated metric, and HMMP, prepared by Tyler Grange;
- Lighting Assessment Addendum, prepared by BDP.

The requisite application fee of £293.00 (Plus a Planning Portal admin fee of £70.00) has been paid online via the Planning Portal (PP-13760815) at the time of submission. There is no fee incurred for the S19 application (PP-13760859).

We look forward to receiving confirmation of registration and validation of the applications shortly. If you have any queries in the meantime, please do not hesitate to contact Sam Neal (██████████) or Aadam Siddiqui (██████████) of this office.

Yours faithfully



Newmark