



Historic England

LONDON OFFICE

Ms Seonaid Carr  
London Borough of Camden  
Town Hall  
Argyle Street  
London  
WC1 8ND

Direct Dial: 020 7973 3763

Our ref: P00462962

9 July 2015

Dear Ms Carr

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015  
LAND BETWEEN 26 GORDON SQUARE AND 15 GORDON STREET  
(INCLUDING BLOOMSBURY THEATRE), LONDON, WC1H  
Application No 2015/3302/P**

Thank you for your letter of 12 June 2015 notifying us of a planning application for the New Student Centre at the UCL campus in Bloomsbury. Historic England was pleased to be involved in pre-application discussions regarding these proposals and is encouraged by the many positive revisions that have been made to the scheme as a result of these negotiations. We can now offer the following advice:

**Significance of the Historic Environment**

The New Student Centre is proposed on a gap site at the junction between Gordon Street and Gordon Square. The site is located within the Bloomsbury Conservation Area, and there are a number of listed buildings within the vicinity including the Grade I Wilkins Building to the west, and a Grade II listed terrace to the south on Gordon Square.

As identified in the Bloomsbury Conservation Area Appraisal (London Borough of Camden, April 2011), "the buildings around Gordon Square exhibit a variety of architectural styles [but] have a similar scale which acts as a strong unifying element" (p25). However, it is recognised that this character and scale changes dramatically along Gordon Street where original terraces have been replaced by large-scale post-war buildings, such as the neighbouring Bloomsbury Theatre. Although the distinctive grain of the terraces form the backbone of the Conservation Area, these large-scale buildings with institutional uses also contribute to its character, as expressed in the Conservation Area Appraisal. The existing gap site and unsightly rendered gable of 26 Gordon Square, both a consequence of WWII bomb damage, somewhat detract from the character of the Conservation Area, and consequently the site is identified as an opportunity area in the Conservation Area Appraisal.



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

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### Impact of the Proposals

The proposed Gordon Street elevation of the New Student Centre would be four bays wide and would feature a double-height ground floor with three additional floors above and a saw tooth-style attic storey. The building would appear lower than the Bloomsbury Theatre but taller than the listed terrace house at 26 Gordon Square when viewed from street level. The building would project forward from the line of the listed terrace and would obscure some of its features of interest such as the chimney stack of Number 26.

The construction of the rear elements would involve the demolition of the Node building which is a non-original service tower for the Bloomsbury Theatre and currently presents an undesirable impact on the setting of the Wilkins building. The rear of the development site, which borders on to the Wilkins Building and the unlisted Bernard Katz building, would become a Japanese Garden; essentially a quad space for both the University and general public. This would be accessible via the Gordon Street entrance. Mottled buff brickwork is proposed for all external elevations.

### Policy

In considering these proposals section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on local authorities to consider the impact of development proposals upon listed buildings. It states that the determining authority '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'. Section 72 requires local authorities to have special regard to the desirability of preserving or enhancing the character of appearance of conservation areas.

The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the 12 core principles that define sustainable development.

Paragraph 131 advises 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.

Paragraph 134 indicates that when 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.



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**Historic England's Position**

It is clear that the existing gap site detracts from the character of the Bloomsbury Conservation Area, and the development presents an opportunity for enhancement by reinstating the grid pattern of the streetscape. The concealing of the unattractive rendered gable of 26 Gordon Square (which before WWII formed a party wall with Number 27) would also be of benefit to the listed terrace. The large-scale institutional buildings, many of which can be found in this part of the Bloomsbury, make a significant contribution to the character of the Conservation Area, and the New Student Centre would sustain this collegiate character, particularly in the formation of the quadrangle to the rear. The removal of the Node building to the rear of the Bloomsbury Theatre will improve the setting of the Grade I listed Wilkins Building and new and exciting views of its rear wings will be created in the formation of the publically accessible Japanese Garden.

In terms of design, the new building would also respond to the terraces around Gordon Square in its repeated rhythm of vertical bays with brickwork elevations and reconstituted stone dressings. We therefore consider that the New Student Centre offers much to sustain, and in some cases enhance the character of Bloomsbury Conservation Area and the significance of the neighbouring listed buildings, which support Sections 66 and 72 of the Planning Act and Paragraph 131 of the NPPF.

However, as outlined in our various pre-application comments, we continue to conclude that some harm would be caused to the setting of 26 Gordon Square and the Conservation Area by the uncomfortable junction that would be created between the listed building and New Student Centre. This impact is clearly illustrated in Views 3 and 4 from Gordon Square in the Townscape, Conservation and Visual Impact Assessment (Millerhare/Tavernor, June 2015). These visualisations demonstrate that the blind flank elevation of the Student Centre continues to obscure the silhouette of the listed building and its features of interest such as its chimney stack.

We recognise that significant improvements to the building's scale and design have been made since we provided our initial pre-application comments in 2013, and in particular we welcome the stepping back of the southernmost bay of the Student Centre which has reduced the level of harm in our view. We continue to suggest that proposed enhancements to 26 Gordon Square (which we understand is also owned by UCL), such as the reinstatement of chimney pots and the removal of the modern safety rail behind the parapet, could help reduce the level of harm. We would also recommend that further details regarding the junction between the two buildings are provided to ensure that appropriate flashing and drainage is included. These details could be covered by condition if your Council is minded to approve the scheme.



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**Recommendation**

Historic England recognises the opportunity this development presents in creating an exciting and publically accessible new part of the UCL campus in Bloomsbury, and as identified there are many heritage benefits that could be delivered as part of this scheme. We have, however, identified a degree of harm that we consider would be caused, and we would urge your Council to consider our suggestions to mitigate this. Moreover your Council should be satisfied that the harm is necessary and clearly outweighed by any public benefits that are proposed as part of this development.

If you would like further advice or clarification on any of the points raised, please contact us.

Please note that this response relates to historic building and historic area matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3712).

Yours sincerely

**Alasdair Young**

Assistant Inspector of Historic Buildings and Areas

E-mail: [alasdair.young@HistoricEngland.org.uk](mailto:alasdair.young@HistoricEngland.org.uk)

cc Antonia Powell, London Borough of Camden



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