



36-38 Gordon Square
Planning Statement

1 Introduction

Introduction

1.1 On behalf of our Client, University College London (“UCL”), this planning statement has been prepared in support of a planning and listed building consent application for refurbishment works at 36-38 Gordon Square, WC1H 0AL (“the site”). The application is seeking planning and listed building consent for:

“The refurbishment of 36-38 Gordon Square to provide a collaboration hub for the UCL’s School of Economics and Public Policy. Internal alterations include the internal demolition of a party wall between the front lower ground rooms of nos. 36-37, the removal of modern partitions located across all floors, the relocation of the top step and addition of a balustrade at the staircase in no.36, the alteration of existing openings across nos. 36-38 and general refurbishment works throughout. External alterations include the reinstatement of no.37’s front door, alterations to two windows to the rear elevation, removal of a non-original lean to extension, and landscaping and renovation works to the rear gardens.”

1.2 These proposals seek to upgrade the properties to a modern standard commensurate with UCL’s need for flexible and adaptable academic workspace whilst respecting the historical significance of the Grade II listed fabric.

1.3 It is proposed that the properties will be used by a new academic school, the School of Economics and Public Policy (SEPP) as a working space and collaborative hub.

1.4 This Statement sets out the planning justification for the proposed development and provides an assessment against the relevant planning policies and other material considerations.

The Applicant – University College London

1.5 UCL is London’s leading multidisciplinary university, with over 11,000 staff and nearly 40,000 students. UCL provides excellence and leadership in teaching and research, was ranked tenth in the QS World University Rankings 2019, and is among the top 20 universities ranked by The Times (10) and The Guardian (10).

1.6 The proposed development provides further global visibility for UCL, allowing it to compete internationally in research and provision of higher public profile debates, seminars and workshops.

Application Documents

1.7 This application comprises of:

- Application forms, certificates and notices (prepared by Deloitte Real Estate);
- Planning Statement (prepared by Deloitte Real Estate);
- CIL Questions Form (prepared by Deloitte Real Estate);
- Design and Access Statement (prepared by Nicholas Hare Architects);
- Site location plan (prepared by Nicholas Hare Architects);
- Site Plan (prepared by Nicholas Hare Architects);

- Architectural Drawings (including existing, demolition and proposed plans, sections, roof plans and external and internal elevations) (prepared by Nicholas Hare Architects);
- Detailed Drawings (showing new or replacement architectural details such as new joinery and cornices); (prepared by Nicholas Hare Architects);
- Reflected Ceiling Plans (prepared by Nicholas Hare Architects);
- Heritage Statement and accompanying Age of Fabric and Impact of Proposals drawings (prepared by Alan Baxter Associates);
- Photographic Schedule (prepared by Alan Baxter Associates);
- Statement of Justification (prepared by Nicholas Hare Architects, Alan Baxter Associates, Conisbee and Deloitte Real Estate);
- Structural Survey and Accompanying Drawings (prepared by Conisbee); and,
- Schedule of Works (prepared by Nicholas Hare Architects).

Structure of Planning Statement

1.8 The remainder of this planning statement sets out the site context, the background to the application, the planning policy framework, key policies and how the scheme addresses these.

1.9 This statement comprises the following chapters:

- Chapter 2: Site Context;
- Chapter 3: Background to Application;
- Chapter 4: The Proposals;
- Chapter 5: Pre-application consultation;
- Chapter 6: The Development Plan and Policy Designations;
- Chapter 7: Planning Policy Considerations;
- Chapter 8: Benefits of the Proposals; and,
- Chapter 9: Conclusions.

2 Site Context

Site Location

- 2.1 The site is located in the London Borough of Camden ('LBC'). It is located within Bloomsbury and on the northeastern edge of the UCL Bloomsbury campus.
- 2.2 It is bounded by Gordon Square to the west, Endsleigh Place to the north, the rear of Tavistock Square terraces to the east, and 39 Gordon Square to the south. The site is located in the northeast corner of Gordon Square where it abuts Endsleigh Street. The Square forms a series of planned Georgian Squares across the Bloomsbury character area.
- 2.3 The site is located close to three public transport stations: Euston Station (350 meters) and Euston Square Station (270 meters) to the North; and Russell Square Station (500 meters) to the South.
- 2.4 The site comprises three adjoining Georgian townhouses, of 4 storey, plus basement and attic. It forms part of a Georgian terrace that stretches the east side of Gordon Square.

Surrounding Area

- 2.5 The surrounding area is characterised by a mixture of uses typical of its location within Central London. However, on Gordon Square itself, the area is characterised by B1, D1 and sui generis student accommodation, a reflection of its proximity to the heart of the UCL Bloomsbury Campus.
- 2.6 The character of the built form in the surrounding area is that of Georgian terraces and garden squares typical of the Bloomsbury Conservation Area.

Site Description

- 2.7 The building is Grade II listed (reference 1113031) and was listed on 28 March 1969. The listing title is:

"Gordon Square nos. 36-48 and attached railings and wall on Endsleigh Place return screen wall linking number 36 Tavistock Square."

- 2.8 The listing description is extracted below:

"Includes: Screen wall linking No.36 Gordon Square & No.29 Tavistock Square ENDSLEIGH PLACE. Terrace of 11 houses. c1825. Built by Thomas Cubitt. Yellow stock brick with rusticated stucco ground floors (No.46 plain). Balanced composition of 4 storeys and basements. 3 windows each. Entrance to No.36 on return to Endsleigh Place. Square-headed, recessed doorways with fanlights and panelled doors. Nos 36, 38, 43 and 45 slightly projecting with 4 Corinthian pilasters through 1st and 2nd floor carrying entablature, continuing across the rest of the terrace, at 3rd floor level. Continuous cast-iron balconies to 1st floor casements, No.46 with cornices. 2nd and 3rd floor, architraved sashes. 3rd floor with pilaster strips above the pilasters. Cornice and blocking course. Return of No.36, with balustraded entrance porch, continues the entablature and pilaster treatment and forms a balanced composition, linked by a low screen wall (along Endsleigh Place), with No.29 Tavistock Square (qv).

INTERIORS: not inspected.

HISTORICAL NOTE: No.46 was the residence of John Maynard Keynes, economist (GLC plaque). (Survey of London: Vol. XXI, Tottenham Court Road and Neighbourhood, St Pancras III: London: 1949: 92.)"

- 2.9 36-38 Gordon Square form part of a series of late Georgian terraced houses designed by one of the leading architect of the period, Thomas Cubitt. The buildings are constructed from London stock brick with stucco architectural dressings to the front and side elevations and a brick rear elevation.
- 2.10 The houses have largely retained their external appearance and the original internal plan form is largely intact, or recoverable. Some high quality original features survive internally, including the principal staircases, cornices and other plasterwork, although there are a number of more recent internal alterations which detract from the significance of the buildings including modern partitions.
- 2.11 The main elevation fronts Gordon Square. However, the main entrance of no.36 Gordon Square is accessed via Endsleigh Place. No.37 does not have a main entrance independently following the replacement of its front door onto Gordon Square with a window. The main entrance of no.38 Gordon Square is accessed via Gordon Square.
- 2.12 The properties are set over 6 storeys, including a basement level, and the top (fourth) floor within a mansard roof set behind a brick parapet. To the rear of the properties are historic extensions over 2 storeys.
- 2.13 The buildings have been in D1 use by the University of London and have previously been used by the London School of Hygiene and Tropical Medicine. UCL has recently acquired the long-term leasehold for these properties and will be refurbishing them to a suitable standard to accommodate the new School.

Planning History

- 2.14 There have been no applications for significant alterations at the site in its recent history.
- 2.15 The building has been subject to a listed building consent application in 1986 for the addition of an attic storey dormer window, demonstrating that this is a modern addition. Application reference 8670229 gained listed building consent in 1986 for: "*36 Gordon Square: Construction of a dormer window in the roof space as shown in drawing 3002/1.*"
- 2.16 The only recent Listed Building Consent application, which granted has been for minor works only, for the erection of 3 no. stainless steel gas boilers at basement level (reference 2010/4380/L).

3 Background to Application

Project Background

School of Economics and Public Policy (SEPP)

- 3.1 The properties will be used by the proposed new School of Economics and Public Policy (SEPP) ('the School') as a working space and collaborative hub.
- 3.2 The new school is a collaboration between the Department of Economics and Department of Political Science which are current departments on UCL's Bloomsbury campus. SEPP will also form a strong and integrated relationship with the Institute of Fiscal Studies (IFS), to form part of the current Strategic Operation Plan (SOP) for the Faculty of Social and Historical Sciences at UCL.
- 3.3 The IFS is a politically independent economic research institute based close to UCL's Bloomsbury campus which produces academic and policy related findings. Its research teams include UCL students and academic staff.
- 3.4 A number of notable synergies already exist between the Departments of Economics and Political Science and further collaboration with the IFS is seen as increasing the visibility and policy impact of the new School. However, unlike other comparable institutions, the focus for the new School at UCL will be collaboration and integration of the core disciplines of economics, politics, international relations and public policy rather than these remaining departmental silos.
- 3.5 With this strong emphasis on collaboration, the new School will act as the hub, both in London and nationally, for visiting international speakers and those engaged in policy, politics and economics research.
- 3.6 The new school will be seen as a European competitor to the Kennedy School (Harvard) and the Woodrow Wilson School of Public and International Affairs (Princeton). Within the UK, the Blavatnik School of Government (University of Oxford), the Governance School of Public Policy (Kings College London) and institutes at the London School of Economics are immediate comparators. The formation of SEPP will ensure UCL's international competitiveness in terms of attracting the best students and staff in this field.

SEPP: Locational Requirements

- 3.7 In order to maximise the benefits of both the collaborative activity within the School and the contribution of significant speakers and research visitors, it is critical that the School can act as a public forum and facilitate public engagement and debate.
- 3.8 To support this, a satellite collaboration facility was proposed, and UCL undertook a review of possible locations for this facility within Bloomsbury. From this review, 36-38 Gordon Square was chosen because, from the limited alternative options, these did not provide the appropriate setting or mix of accommodation required by the new School.
- 3.9 Reasons for selecting 36-38 Gordon Square to accommodate the new school, include, but are not limited to, the following:

- The site, being located in a prominent position on Gordon Square, offers accommodation befitting to a public facing School.
- Due to its excellent transport links, it is also easy to access by members of the public, and visiting speakers and academics.
- The architecture of the building is also suitable to the proposed use of the building. The Georgian building was designed with a hierarchy of spaces at each level. The hierarchy is well suited to the different types of spaces that the School will need, including both public facing and private areas.
- The site's location is within the Bloomsbury Campus. There is very limited opportunity for UCL to provide spaces for new schools within its established Bloomsbury Campus. This proximity to other UCL institutions, schools and university amenities is beneficial to the future users and will further enable collaboration.
- The site is located in close proximity to the existing Departments of Economics and Political Science. This means that academic staff can be retained within the borough. The School's future partner, the IFS, is also located in Bloomsbury.

3.10 36-38 Gordon Square can deliver the School's vision, particularly in relation to public engagement. Please refer to the Statement of Justification for further detail on the review of alternative locations for the new School.

SEPP: Space Requirements

- 3.11 The new School requires a large seminar and event space, a range of smaller meeting and break-out spaces and informal meeting and social spaces. This mix of spaces will provide the opportunity for the School to offer public facing activities including programmes of evening talks through to longer curated conferences.
- 3.12 The new School also requires high quality spaces that provide the facilities it needs to operate effectively and collaboratively. The properties are currently in a poor state of repair and in need of modernising, upgrading and refurbishment. The refurbishment works will bring the buildings up to the standard required for the new School. The School's engagement with the design process early on, also ensures that the spaces are provided in line with their requirements from the outset, reducing the need for interventions into the building in the short-term.
- 3.13 Perhaps the most important requirement for the new School, is the provision of a large event / seminar space. This would be public facing and would host evening talks, seminars, teaching and events.
- 3.14 Due to operational requirements, such as fire safety, this space cannot be provided in one of the townhouses. This is because escape routes of occupants in case of a fire would be limited to one staircase and exit. In order to meet fire safety requirements in this design scenario, occupancy of the seminar / event space would be very limited. Please refer to the Statement of Justification for further detail on the limitations to occupancy of the space. The Statement sets out the alternative design options for providing this size of space within the building and why they were discounted. An event space this size would not be feasible for the new School.
- 3.15 Therefore, it is proposed to form a new seminar / event space by creating an opening between two of the properties (no.36 and no.37) at basement level. This will result in the creation of a larger capacity seminar / event space for up to 60 people.
- 3.16 A statement of justification has been prepared in support of this proposal specifically. The Heritage Statement also sets out the harm of this proposal weighed up against the public benefits which are considered to outweigh the harm. Later in this planning statement, the public benefits of the proposals are also set out in order to demonstrate that the harm is sufficiently justified.

3.17 The provision of this seminar / event space is fundamental to the creation of the new School and its location in Bloomsbury. The approval of the proposals to create this space will enable the refurbishment of the Grade II listed buildings.

SEPP: The Relationship between Academia and the Public

3.18 The new space at 36-38 Gordon Square will provide a new home for collaborative research between the departments of economics and political science. The renovated building, and the large seminar room in particular, will enable researchers to host collaborative research projects as well as those that involve external partners.

3.19 The scheme enables academic users to have a space to bring external organisations to UCL and co-produce research with a clear public benefit. For the public there are both direct and indirect benefits. First, the space offers opportunities for providing public facing events, enabling the public to have a direct contribution and learn from the School. For example, the Policy & Practice Seminar Series is open to the public and offers publicly accessible talks on a range of policy issues. Second, the public also indirectly benefit from the research and educational programmes produced by the School.

3.20 The new space will enable greater public engagement with policy-relevant research. This research serves the public interest by providing a greater evidence base for political debate and decisions, as well as putting the public at the heart of rigorous academic research.

Summary

3.21 The proposed refurbishment and alterations to the Grade II listed buildings, 36-38 Gordon Square, are being driven by the creation of a new School at UCL, SEPP, which has a number of locational and spatial requirements in order to succeed. With the implementation of the proposals, the following outcomes will be achieved:

- Increased global visibility for UCL;
- Public policy benefits including indirect and direct benefits to the public;
- Intellectual benefits;
- Teaching benefits; and,
- Collaborative benefits.

3.22 The need for the proposals will result in the sensitive refurbishment of a Grade II listed heritage asset resulting in a number of heritage benefits.

4 The Proposals

Description of Development

4.1 This application is seeking planning and listed building consent for:

“The refurbishment of 36-38 Gordon Square to provide a collaboration hub for the UCL’s School of Economics and Public Policy. Internal alterations include the internal demolition of a party wall between the front lower ground rooms of nos. 36-37, the removal of modern partitions located across all floors, the relocation of the top step and addition of a balustrade at the staircase in no.36, the alteration of existing openings across nos. 36-38 and general refurbishment works throughout. External alterations include the reinstatement of no.37’s front door, alterations to two windows to the rear elevation, removal of a non-original lean to extension, and landscaping and renovation works to the rear gardens.”

Summary of Proposals

External Works

4.2 Please refer to the DAS and Schedule of Works for full details of the proposals, in summary the external works include (but are not limited to) the following:

- Landscaping and renovating of the rear gardens;
- Re-instatement of the front door at no.37 which was historically removed and replaced with a window;
- Removal of a small historic lean to addition to the rear of no.38;
- Installation of a new window where the lean to is removed;
- Repair and repaint of existing window frames and repair to glazing panels;
- Repair of roof slates where required;
- Removal of two small windows to rear of no.37 at the upper landing level and replace with one window as per the original design.
- General repair and refurbishment works to external areas.

Internal Works

4.3 Please refer to the DAS and Schedule of Works for full details of the proposals, in summary the internal works include (but are not limited to) the following:

- At all levels:
 - General refurbishment and repairs;
 - New lighting strategy;
 - Alterations to existing layout to reinstate the original layout insofar as possible;
 - Removal of modern partitions where possible;
 - Alterations to existing doorways joining the three terraces, including the widening of some openings and blocking up of others;
 - Alterations to and refurbishment or WC’s and kitchen spaces;
- At basement level specifically:
 - Removal of the party wall and associated structural interventions between no.36 and no.37 to accommodate the new seminar / events space.

4.4 For a full description of the works, please refer to the Design and Access Statement, Architectural Drawings and Schedule of Works prepared by Nicholas Hare Architects.

5 Pre-application Consultation

- 5.1 This application has been subject to detailed pre-application discussions with the London Borough of Camden. This section summarises these discussions.
- 5.2 Initial pre-application consultation with LB Camden took the form of a site visit with the conservation officer. During the walk around of the site, the vision of the new School and the proposals for the buildings were discussed in considerable detail. From the outset and throughout subsequent pre-application discussions, the officer was supportive of the removal of modern fabric, and the reinstatement of original features and plan form. The conservation officer strongly supported the reinstatement of the front door at no.37.
- 5.3 Additional meetings were held to further discuss detailed design, particularly in relation to the creation of a large seminar / event space within the building. Should a party wall be removed to create the space, the conservation officer advised that a downstand would need to be retained. The officer also set out that a robust justification setting out the public and heritage benefits of the wider proposals would be required to support an application.
- 5.4 In response to this feedback, the architectural drawings were amended to include a downstand to demonstrate the original plan form.
- 5.5 The design team also worked with LB Camden Conservation and Planning officers to provide further information about the new School, its work and research, and the alternative locations that were considered to accommodate it in and around the Bloomsbury Campus. This culminated in the preparation of a Statement of Justification. The statement was prepared with input from the applicant, the end-users, architects, heritage consultants, structural engineers and the planning consultant and in consultation with LB Camden.
- 5.6 The additional information set out in the statement provided a full justification for the works. It demonstrates why this location is the only possible option for the new School, and the considerable public and heritage benefits of the overall works. Consequently, the proposals meet the tests of national and local planning policy and should garner LB Camden officer support.
- 5.7 UCL has carried out significant pre-application consultation discussions with LB Camden to ensure that the proposals can be supported by planning and conservation officers. This has demonstrated UCL's willingness as custodians of the listed buildings, to engage with the local authority. UCL's intent is always to secure the best possible outcome for its heritage assets whilst ensuring that they remain viable in their long term use.

6 The Development Plan

6.1 This section sets out the development plan and site designations, which apply to the application site.

The Local Development Plan

6.2 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.

6.3 The application will be assessed against LB Camden’s Development Plan. The Development Plan comprises:

- The London Plan (2016, amended 2017);
- Camden Local Plan (2017);
- Camden Site Allocations Plan (2013);
- Camden Policy Map (2019);
- Euston Area Plan (2015); and,
- Fitzrovia Area Action Plan (2014).

6.4 Material considerations for the site will also be considered when determining the application. These include the following documents:

- National Planning Policy Framework (2019);
- The Draft New London Plan (2018);
- Bloomsbury Conservation Area Appraisal and Management Strategy ('BCAA') (2011); and,
- Camden Planning Guidance documents: Design (2019).

Site Allocations

6.5 The following policy designations apply to the application site:

- Central Activities Zone;
- Left wing of the Primrose Hill Background Assessment Area; and,
- Bloomsbury Conservation Area (Sub-area 2: Gordon Square/Woburn Square/Byng Place).

6.6 The next section will set out the key planning considerations for the proposals taking into account the above policy designations and the nature of the proposals.

7 Policy Assessment

Introduction

7.1 This section assesses the proposals against the relevant policy. Key planning considerations are:

- Principle of Development and Land Use; and,
- Heritage and Design.

7.2 The section concludes with a summary of the benefits of the proposals.

Principle of Development and Land Use

7.3 London Plan Policy 2.1 'London in its Global, European and United Kingdom Context' will support proposals and policies that retain and extend London's global role as a sustainable centre for a range of sectors, including education, whilst policy 2.10 'Central Activities Zone – Strategic Priorities' outlines the need to "enhance and promote the unique international, national and London-wide roles of the Central Activities Zone (CAZ)". Map 2.3 identifies the area as mixed use with a strong academic character.

7.4 London Plan Policy 3.18 'Educational Facilities' outlines the Mayor's support of higher education facilities and their ability to adequately meet the demands of a growing and changing population. The policy also requires that in the case of planning decisions, development proposals, including change of use to educational purposes which enhance education and skills provision will be supported.

7.5 The Draft London Plan sets out in Policy E8 'Sector growth opportunities and clusters' that "London's higher and further education institutions and their development across all parts of London should be promoted".

The Camden Local Plan (2017) Policy G1 'Delivery and Location of Growth' sets out the Council's aims to deliver growth in appropriate locations. The supporting text references Central London, and the knowledge quarter which is partly located within the Central London area. Supporting text (paragraph 2.52) states that Camden will "support the concentration of medical, educational, cultural and research institutions within Central London that form an integral part of the Knowledge Quarter".

7.6 Local Plan Policy C2 'Community Facilities' states in part E that the Council 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. In assessing proposals, the Council will also balance the impact proposals may have on residential amenity and transport infrastructure."

7.7 Supporting text (paragraph 4.32) builds on this:

"A cluster of research-based organisations is based around an area of King's Cross, Euston Road and Bloomsbury, known as the Knowledge Quarter. Their geographical proximity and concentration is a catalyst for collaborative-based working. In order for these institutions and enterprises to meet changing standards and requirements and sustain their leading edge, there is often an ongoing need to update and modernise facilities. It is important this is realised in a way which balances the impact on residential amenity, local transport infrastructure and the character of the local area".

- 7.8 Local Plan Policy E1 'Economic Development' states in Part E that the Council will secure a successful and inclusive economy in Camden by "*support[ing] the development of Camden's health and education sectors and promote the development of the Knowledge Quarter around Euston and King's Cross while ensuring that any new facilities meet the other strategic objectives of this Local Plan*".
- 7.9 Supporting text (paragraph 5.23) sets out the Council's support for the development of knowledge industries. It reiterates the Knowledge Quarter Partnership's vision for a world-class knowledge hub for the 21st century, raising awareness and leveraged support for innovation, collaboration and knowledge exchange. UCL is a member of the partnership.
- 7.10 Overall, the Camden Local Plan, and the current and emerging London Plans are supportive of the development and strengthening of land uses and institutions that support the knowledge quarter in the Bloomsbury area.

Applicant's Response

- 7.11 The proposals are for internal and minor external refurbishment works to a Grade II listed building already in educational use in an area surrounded by similar institutional and higher educational uses. The building is already in D1 use, and this will not change as a result of the proposals.
- 7.12 The existing building is in need of refurbishment. It is outdated, poorly configured as a result of historic interventions and provides poor quality teaching, learning and working spaces. Consequently it is underutilised despite its prime location in the knowledge quarter. The proposals will bring the existing D1 space up to a modern standard befitting of a building of this importance in this area of Central London. The newly upgraded floorspace will help contribute to the increased presence of the institutions that constitute the knowledge quarter in this part of the CAZ.
- 7.13 The proposals will accommodate the creation of a new School of Economics and Public Policy at UCL. The newly refurbished premises and new facilities will allow it to compete on a global level as a European competitor to the Kennedy School (Harvard) and Woodrow Wilson School of Public and International Affairs (Princeton). This notable and esteemed higher education use will strengthen UCL's presence in the Borough and contribution to CAZ and knowledge quarter activities.
- 7.14 The proposals have been developed in conjunction with the future users who require collaborative spaces, including meeting, working, teaching and an events space. Although being designed for the School specifically, the spaces if required, would be adaptable and suitable for use by D1 users at the University.
- 7.15 The proposals will support the provision of quality D1 spaces in the borough by delivering a large seminar space, academic offices and study areas. Approval of the proposals will support UCL in this Central London location in the LB of Camden, where it contributes positively to the cultural character of the area and its social and economic role in wider London, and the UK.
- 7.16 A key character of this proposal and the future occupier of the refurbished building, is its focus on collaboration. This collaboration is not limited to knowledge sharing within and between institutions, but is also public facing. The type of spaces that the refurbishment will create will enable the School's vision to be highly collaborative. In particular, a pivotal element of the proposal is the creation of a seminar / events space with a larger occupancy level. This spaces serves to provide public seminars and to welcome visitors at lectures, conferences and other events. This enables policy speakers in policy, economics and politics to collaborate not only with academics, but also visiting members of the public.

- 7.17 This public facing element of the School is unique and considered to provide considerable benefit to the public. It explicitly provides benefit to the public through the provision of a space in which members of the public can learn. Its collaborative nature allow research and public policy to be shaped by both academics and visitors, as well as providing a space for learning. It implicitly benefits the public through the School’s research into and subsequent influence on public policy. The School will provide a space allowing the influence of public policy through research and collaboration, therefore, providing benefit to the wider national general public. The provision of a suitable home for the new School, including the proposed collaborative hub in the basement, will be paramount in delivering its vision and in delivering wider public benefit.
- 7.18 The provision of the public facing seminar / events space within this building is of the utmost importance to the School and is necessary in order for it to function appropriately. This is a key driver for the project and will enable the wider refurbishment of the building.
- 7.19 Overall, the proposals will allow for the buildings to be retained in a use compatible with the local area, a use that will make a positive contribution to the knowledge quarter, the Borough and wider London, and a use that provides explicit and implicit public benefit to visitors.

Summary of Public Benefits

- The proposals will create a public facing seminar / event space where members of the public can attend lectures, talks and conferences and learn more about the fields of economic, politics and public policy. All three fields have direct influence on the public.
 - The seminar / events space can be used both by the new School and the wider university to provide learning space for students, staff and visitors of UCL. The space is vital for UCL in terms of fulfilling the role of a higher education provider.
 - The proposals will create space in which users will positively seek to influence public policy through research and collaboration, which by definition will benefit the general public.
 - The proposals will result in the upgrade and maintenance of the listed building which will in turn help to safeguard its longevity and enjoyment by the public. The proposals will ensure it continues to positively contribute to the character of the Bloomsbury Conservation Area and its setting on Gordon Square. Its contribution to the Bloomsbury garden square setting is important and characteristic of this part of London. Therefore it contributes to a key feature of the area that visitors come to enjoy and experience.
- 7.20 For more detail on the public benefits of the proposals, please refer to the statement of justification which also gives real world examples of the influence of the School and its direct impact on the public.

Heritage and Design

- 7.21 Section 16 of the NPPF (2019) ‘Conserving and Enhancing the Historic Environment’ sets out the key tests which proposals will need to meet in relation to their impact on heritage assets.
- 7.22 Paragraphs 189-202 are of relevance. Paragraph 192 states that in determining applications, local authorities should take account of:
- a) “the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
 - c) the desirability of new development making a positive contribution to local character and distinctiveness.”*

- 7.23 Paragraphs 193 – 202 specifically set out how impacts to heritage assets as a result of proposals should be considered. The NPPF sets out that great weight should be given to the assets’ conservation with the level of weight correlating to the level of significance of the asset. Any harm should require clear and convincing justification. Substantial harm to Grade II listed buildings should be exceptional (paragraph 194).
- 7.24 Paragraph 196 states where a proposal is considered to lead to ‘less than substantial harm’ to the significance of a heritage asset, the harm should be weighed against the public benefits of the proposals, including where appropriate securing its optimum viable use.
- 7.25 Policy 7.8 ‘Heritage Assets and Archaeology’ of the current London Plan notes that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. This Policy also ensures development identifies values, conserves, restores, re-uses and incorporates heritage assets, where appropriate.
- 7.26 Draft London Plan Policy HC1 ‘Heritage conservation and growth’ states in part C:
- “Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process”.*
- 7.27 The Camden Local Plan (2017) Policy D2 ‘Heritage’ seeks to preserve, where appropriate, and enhance Camden’s heritage assets and their settings. It states the Council should resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building, and resist development that would cause harm to the significance of a listed building through an effect on its setting.
- 7.28 Camden’s Design CPG sets out that the Council will make a balanced judgment having regard to the scale of any harm or loss and the significance of the asset affected, taking account of:
- The desirability of sustaining and enhancing the significance of any heritage asset/s and putting them to viable uses consistent with their conservation;
 - The positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality and health and wellbeing;
 - The desirability of new development that affects heritage assets to preserve and enhance local character and distinctiveness.
- 7.29 Paragraph 3.27 focuses on the impact of proposals on the historic significance of a listed building, including its features, such as:
- Original and historic materials and architectural features;
 - Original layout of the rooms;
 - Structural integrity; and,
 - Character and appearance.

- 7.30 Camden will expect original or historic features to be retained and repairs to be in matching material and for proposals *"to seek to respond to the special historic and architectural constraints of the listed building, rather than significantly change them"* (paragraph 3.28). It states that listed building applications should be fully justified and demonstrate how the proposals would affect the significance of a listed building and why the works or changes are desirable or necessary.
- 7.31 Material weight will be given to the Bloomsbury Conservation Area Appraisal and Management Strategy as the Site is located within Sub-area 3 of the Bloomsbury Conservation Area.
- 7.32 The Bloomsbury Conservation Area Appraisal and Management Strategy (2011), Paragraph 5.32 states that the appearance of all buildings of historic interest (listed and unlisted) within the Conservation Area is harmed by the removal or loss of original architectural features and the use of inappropriate materials. The loss of original joinery, sash windows, porches and front doors, can have considerable negative impact on the appearance of a historic building and the area.

Applicant's Response

- 7.33 The proposals are for the full refurbishment of the Grade II listed properties which are located in the Bloomsbury Conservation Area. Externally, the proposals include for repair and replacement where required on a like for like basis. The proposals also include a couple of more significant external interventions to the external elevations, namely the reinstatement of the front door at no.37, and the replacement of two windows with one window to the rear. In both instances, the proposals would reinstate the original features of the building and are therefore considered to have a beneficial impact on the significance of historic building and the conservation area.
- 7.34 Internally, the proposals have been prepared with careful consideration to the significance of the heritage asset. The proposals have been developed to be sympathetic to historic features and seek to reinstate plan form wherever possible. Only appropriate repair and refurbishment methods will be used to ensure due care is taken when interacting with significant historic fabric. The overall refurbished building will deliver high quality design in terms of finish and quality of space.
- 7.35 The proposals will deliver heritage benefits through: retaining original features; reinstating the layout to reflect the original plan form wherever possible; and, removing and making good modern additions wherever possible.
- 7.36 Where repairs to historic fabric are required these will be made to ensure the longevity of the listed building. The ongoing maintenance of the listed building will ensure that it continues to make a positive contribution to the historic environment of Bloomsbury and its setting on Gordon Square. The maintenance of the building for the enjoyment of future generations is considered to be of public benefit.
- 7.37 The proposals seek listed building consent for the removal of the party wall between no.36 and no.37 at lower ground floor level. The proposals would result in minor harm to the original plan form at basement level and will result in the removal of some historic fabric. However, it is considered that the lower ground floor level is less significant than the other principle floors and the wall to be removed contains limited original features. To mitigate this impact, a record would be made before and during removal of the original fabric to capture evidence of Georgian building practice and materials. The resulting record would be deposited in the Camden Archive and would enable further public learning.
- 7.38 The removal of the party wall at this level will not impact how the buildings are read as 3 individual Georgian townhouses and therefore will have no impact on the Bloomsbury Conservation Area.
- 7.39 The Heritage Statement sets out that the removal of the party wall at basement level and subsequent loss of historic fabric is justified by the numerous heritage benefits of the wider proposals. Additionally, it is justified through the creation of a new academic school, which will deliver wider public benefits through public learning spaces allowing enhanced research and collaboration within the public policy field.

- 7.40 The provision of the seminar space within the building is a key driver for the scheme and will enable the wider refurbishment and improvements to the listed asset. Overall, the level of harm caused to the listed building by the removal of this original fabric and erosion of original layout can be overcome by the delivery of considerable public and heritage benefits.
- 7.41 The proposals have sought to enhance and preserve the Heritage asset insofar as possible, in line with the requirements of the Development Plan.

Summary of Heritage Benefits

- The proposals provide opportunity to reveal the special interest of the building, principally through restoring the original proportions of many of the rooms.
 - Modern additions will be stripped out wherever possible to reinstate the architectural interest of the building.
 - External alterations will contribute to the reinstatement of the architectural vision for the building.
 - Historic and original features will be retained and restored wherever possible.
 - The creation of the large seminar / events space will significantly contribute to securing a long term viable use of the building.
 - The proposals will contribute to the maintenance of the heritage asset, ensuring its longevity and maintaining its contribution to the Conservation Area.
- 7.42 Please refer to the Heritage Statement and Statement of justification for a full assessment of the heritage impact and explanation of the heritage benefits. Overall, the heritage benefits are considered to outweigh the minor harm.

Summary

- 7.43 The proposals present an opportunity to create a new School which has significant public benefits. It also presents a substantial opportunity to enhance the heritage significance of the buildings.
- 7.44 The proposals, by providing high quality D1 space, will positively contribute to the policy vision for the knowledge quarter and will further make significant contributions to the CAZ, the borough and more widely London.
- 7.45 When considering this proposal, and the minor harm to a limited part of the listed building, the applicant requests that LB Camden considers the wider public benefits and the heritage benefits to the building which will be enabled only through the implementation of the proposals, pivotal to which is the delivery of the large seminar / events space.

8 Benefits of the Proposals

- 8.1 Overall, it is considered that the proposals strike a balance between delivering the requirements of SEPP with minimal harm to the heritage asset, with delivery of public and heritage benefits.
- 8.2 The benefits of the proposals are explored in detail within the Statement of Justification and the Heritage Statement.
- 8.3 In summary, the considerable benefits of the proposals include:
- **The proposals will create a public facing seminar / event space** where members of **the public can attend lectures, talks and conferences and learn more about the fields of economic, politics and public policy**. All three fields have direct influence on the public.
 - The seminar / events space can be used both by the new School and the wider university to provide learning space for students, staff and visitors of UCL. **The space is vital for UCL in terms of fulfilling the role of a higher education provider.**
 - The proposals will create **space in which users will positively seek to influence public policy** through research and collaboration, which **by definition will benefit the general public.**
 - The proposals will result **in the upgrade and maintenance of the listed building** which will in turn **help to safeguard its longevity and enjoyment by the public**. The proposals will ensure **it continues to positively contribute to the character of the Bloomsbury Conservation Area** and its setting on Gordon Square. Its contribution to the Bloomsbury garden square setting is important and characteristic of this part of London. Therefore **it contributes to a key feature of the area that visitors come to enjoy and experience.**
 - The proposals **provide opportunity to reveal the special interest of the building**, principally through **restoring the original proportions of many of the rooms.**
 - **Modern additions will be stripped out** wherever possible to **reinstate the architectural interest** of the building.
 - **External alterations** will contribute to **the reinstatement of the architectural form of the building.**
 - **Historic features will be retained and restored** wherever possible.
 - The creation of the large seminar / events space will significantly contribute to **securing a long term viable use of the building.**
 - The proposals will **contribute to the maintenance of the heritage asset, ensuring its longevity** and **maintaining its contribution to the Conservation Area.**

9 Conclusions

- 9.1 To conclude, the existing buildings are tired and in need of refurbishment and modernisation in order to meet the expectation of the new SEPP and associated academics, researchers and visitors, and ensure UCL's (and more widely London's competitiveness and a city that attracts students from across the world) national and global competitiveness.
- 9.2 This application relates to full internal and external refurbishment works. Specific interventions include the reinstatement of the front door at no.37 and the removal of the party wall at the basement level between no.36 and no.37. More broadly, the proposals will seek to reinstate the original plan form and preserve original historic architectural details wherever possible within the buildings. To enable these works, the design must deliver the collaborative spaces that SEPP requires.
- 9.3 The provision of a seminar / event space is fundamental to the creation of the new School and its location in Bloomsbury. The approval of the proposals to create this space will enable the refurbishment of the Grade II listed buildings.
- 9.4 The application has been developed in consultation with LB Camden planning and conservation officers, and the design has been amended in accordance with feedback and advice. The proposals as they stand deliver significant public and heritage benefits. In order to gain a full understanding of these benefits, this statement should be read in conjunction with the submitted Statement of Justification, Design and Access Statement and Heritage Statement.
- 9.5 The proposals have been fully considered against relevant planning policy at National, Regional and Local level, and are considered, on balance, to accord with policy.
- 9.6 For these reasons, it is considered that planning and listed building consent should be granted for these proposals.

Deloitte.

Real Estate

This report has been prepared for University College London on the understanding that it will be made publically available. All copyright and other proprietary rights in the report remain the property of Deloitte LLP and any rights not expressly granted in these terms or in the Contract are reserved. No party other than University College London is entitled to rely on the report for any purpose whatsoever and thus we accept no liability to any other party who is shown or gains access to this document. The information contained within this report is provided to University College London with the planning and listed building consent application for the refurbishment of 36-38 Gordon Square. The report makes use of a range of third party data sources. Whilst every reasonable care has been taken in compiling this report, Deloitte cannot guarantee its accuracy.

Neither the whole nor any part of this Report nor any reference thereto may be included in any published document, circular or statement nor published in any way without our written approval as to the form and context in which it may appear.

Deloitte LLP is a limited liability partnership registered in England and Wales with registered number OC303675 and its registered office at 1 New Street Square, London, EC4A 3HQ, United Kingdom.

Deloitte LLP is the United Kingdom affiliate of Deloitte NWE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NWE LLP do not provide services to clients. Please see www.deloitte.com/about to learn more about our global network of member firms.

© 2019 Deloitte LLP. All rights reserved.