

55-59 Gordon Square – Gordon Square Nursery
Planning Statement

October 2019

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 and the proposed change of use of one student residential unit (use class sui generis) to a nursery (use class D1) at the basement of 55-59 Gordon Square, WC1H 0NU ('the site'). The application is seeking planning and listed building consent for:

"Change of use of the basement level of Nos.55-56 Gordon Square from sui generis (student accommodation) to D1 (nursery) and refurbishment works including internal and external alterations to the basement and external areas of Nos.55-59."

- 1.2 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

- 1.3 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).
- 1.4 UCL are the long term leaseholder of the building, and own and manage the nursery which is for children of UCL staff and students only.

Application Documents

- 1.5 This application is supported by the following suite of documents:
- 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);
 - Site Location Plan (prepared by Kendall Kingscott);
 - Site Plan (prepared by Kendall Kingscott);
 - Design And Access Statement including Transport Statement (prepared by Kendall Kingscott);
 - Architectural Drawings (including existing, demolition and proposed plans);
 - Proposed Internal Door Schedule (prepared by Kendall Kingscott);
 - Heritage Statement (prepared by Alan Baxter Associates);
 - Photographic Schedule (prepared by Kendall Kingscott);
 - Schedule of Works (prepared by Kendall Kingscott);
 - Acoustic Report (prepared by Environmental Equipment Corporation Ltd);
 - Emergency Plan (prepared by UCL);
 - Mini Ska Assessment (prepared by UCL);
 - Tree Survey/Arboriculture Report (prepared by Sylva Consultancy); and,
 - Management Plan (prepared by UCL).

Structure of Planning Statement

1.6 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.

1.7 This statement comprises the following chapters:

- Chapter 2: Site Context;
- Chapter 3: Background to Application;
- Chapter 4: The Proposals;
- Chapter 5: The Development Plan and Policy Designations;
- Chapter 6: Planning Appraisal;
- Chapter 7: Public Benefits; and
- Chapter 8: Conclusions.

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2 Site Context

Site Location and Surrounding Area

- 2.1 The site is located in the London Borough of Camden ('LBC') within the UCL Bloomsbury campus.
- 2.2 It is bounded by Woburn Square to the west, Gordon Square to the north, 26 Bedford Way (Institute of Education) to the east and 17 Woburn Square to the south. The site is located on the northeast corner of Woburn Square and the southeast corner of Gordon Square. The Squares forms a series of planned Georgian Squares across the Bloomsbury character area. This site is located within Sub-area 2 of the Bloomsbury Conservation Area 'Gordon Square/Woburn Square/Byng Place.
- 2.3 The surrounding area is characterised by a mixture of uses typical of its location within Central London. However, on Gordon Square and Woburn Square, the area is characterised by B1, D1 and sui generis student accommodation, a reflection of the site's proximity to the heart of the UCL Bloomsbury Campus.
- 2.4 The character of the built form in the surrounding area is that of Georgian terraces and garden squares typical of the Bloomsbury Conservation Area. The site itself is Grade II listed, the neighbouring IoE (20-26 Bedford Way) is Grade II* listed, and the terraces directly to the south and north are also Grade II listed.
- 2.5 The site is located close to bus routes, major train stations (Euston is 520m away and Kings Cross a little further) and two underground stations: Euston Square Station (420 meters) to the north and Russell Square Station (360 meters) to the south.
- 2.6 An extract of the site location plan is included below.

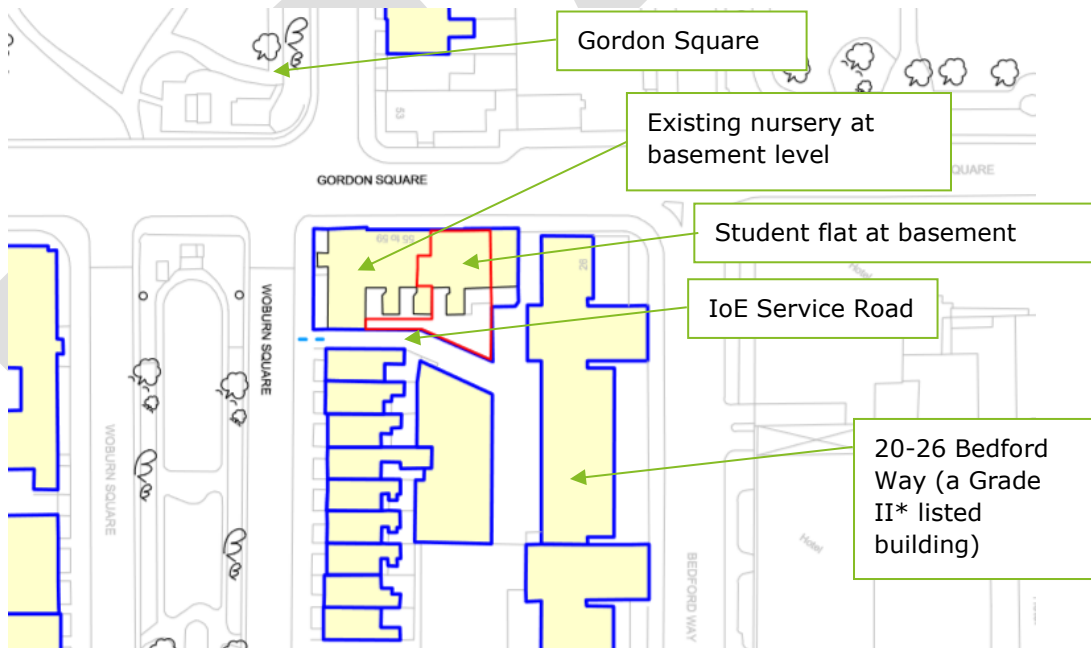


Figure 1 Site Location Plan (extract of the Site Location Plan prepared by Kendall Kingscott).

Site Description

- 2.7 55-59 Gordon Square form part of a series of early 19th century Georgian terraced houses designed by one of the leading architects of the period, Thomas Cubitt. The building occupies a prominent corner location, with the main elevation (north elevation) fronting onto Gordon Square, and the side elevation (western elevation) fronting onto Woburn Square.
- 2.8 The terraced properties comprise of 4 storeys, with basement and mansard roof. The upper floors of the buildings are in D1 use. There is one student accommodation unit in the basement of No. 55-56. The existing nursery currently occupies the basement of No.57-59 Gordon Square. No.57-59 is linked internally, as is No.55-56. There is currently no opening at basement level between No.55-56 and No.57-59.
- 2.9 Access into the Nursery is via the external staircase into the lightwell from Woburn Square. There is also a rear access via the service road to the IoE. This rear access can be used to enter both the nursery and the flat, however the main entrance for the nursery is from Woburn Square.
- 2.10 The total site area of No.55-59 Gordon Square is approximately 658 m² inclusive of external areas. External areas are mostly at basement level, however, there is an additional area to the rear which is at ground level.
- 2.11 In the upper level of the rear garden, there is a mature fig tree which is protected by a Tree Preservation Order (TPO).
- 2.12 Internally at basement level, the properties do not retain many original features and have been considerably altered over time, both in terms of layout and finishes.
- 2.13 The building is Grade II listed (reference 1113035) and was listed on 14 May 1974. The listing title is:
"Numbers 55 to 59 and attached railings, 55 to 59, Gordon Square."
- 2.14 The listing description is extracted below:
"Terrace of 5 houses. c1824. Built by Thomas Cubitt. Yellow stock brick with stucco ground floor (Nos 55 & 59 rusticated) and dressings. EXTERIOR: symmetrical front of 11 bays, 3 bays at each end projecting. Left hand return 1 window; right hand return to Woburn Square, 3 windows and single storey, 1-window extension. 4 storeys and basements. Entrances on main facade converted to C20 sash windows. Projecting bays with 4 pilasters rising through the 1st and 2nd storeys to support an entablature at 3rd floor level, continuing in a simplified form across the front of the building. Windows to projecting bays tripartite sashes except 1st floor being casements with cast-iron balconies. Architraved 1st floor casements to centre of facade with cast-iron balconies. Plain stucco 2nd floor sill band. Remaining windows, recessed sashes. Parapet with stucco capping. Returns with pilasters at angles supporting entablature at 3rd floor level. No.55 entrance in left hand single storey extension with pilasters and segmental headed window; entrance to No.59 on right hand return with Doric porch surmounted by a balustraded balcony to 1st floor window."

INTERIORS: not inspected.

SUBSIDIARY FEATURES: attached cast-iron railings with foliated finials to areas.

Planning History

- 2.15 The following relevant planning applications have been found following an online search of LBC's planning applications database. These applications demonstrate that the site has been subject to many minor alterations.

Site Address	Application Reference	Description of development	Decision and Date
55-59 Gordon Square	2005/1068/L	Replacement secondary glazing at ground and first floors to front elevation.	Granted 04-05-2005
55-59 Gordon Square	2005/1521/L	Structural repairs to partitions, walls, floors, and securing of rear wall at 3rd floor level of houses No. 56, 57 & 58 Gordon Square.	Granted 10-06-2005
55-59 Gordon Square	2005/4135/L	Removal and replacement of existing redundant soil and waste pipes, installation of new waste pipe on rear elevation and other internal alterations.	Granted 08-12-2005
55-59 Gordon Square	2004/4355/P & 2004/4356/L	The provision of disabled access to 59 Gordon Square, the main entrance to the building, relocation of the entrance to the basement nursery, increase in height of part of the main roof and installation of additional dormer windows at fourth floor level, together with the installation of an internal lift and internal works associated with the refurbishment of the building.	Granted 02-12-2004
55-56 Gordon Square	L9600263R1 & P9600262R1	Use as a self-contained residential flat for five students, as shown on drawing numbers 1041/1, /3 (as amended), and /6. Internal alterations at basement level associated with the use as residential with five student study bedroom spaces, involving partial demolition to internal lobby and formation of internal kitchen and bathroom, as shown on drawing numbers 1041/1, /3 (as amended), and /6.	Granted 12-04-1996
59 Gordon Square	23772	The change of use of the basement from University use to Day Nursery.	Granted 28-02-1977
59 Gordon Square	12783	The change of use of the ground and first floors of No 59 Gordon Square, W.C.1. from offices to use for University purposes.	Granted 27-04-1972
56 Gordon Square	C/27/10	Use of the premises for university purposes on behalf of the Institute of Education, 56 Gordon Square, Holborn, W.C.1.	Granted 28-11-1960

- 2.16 The planning history demonstrates that No. 55-56 has planning permission as a student residential flat since 1996 and No.59 has planning permission for a nursery. Both the units have been in accordance with the permissions.
- 2.17 Based on the available planning history, it is not clear at what point in time the nursery was extended from No.59 into No. 57 and No. 58. However, since the nursery has operated within these properties for more than 10 years, the nursery is in lawful use.
- 2.18 The planning history confirms that a change of use from sui generis to D1 will need to be sought to allow for the nursery use to be extended into No. 55-56 at basement level. The remainder of the properties are already in D1 use.

3 Background to Application

Project Background

- 3.1 The proposals are for the expansion and improvement of the existing nursery at UCL. This nursery is the only facility within UCL providing childcare support to UCL staff and students.
- 3.2 The existing nursery (57-59 Gordon Square) has been on site for at least 35 years as part of the Institute of Education and was registered as a UCL facility in 2011. The nursery is open for 49 weeks of the year, Monday to Friday, 08.30-17.30.
- 3.3 The nursery currently employs 10 staff. All staff hold appropriate early years qualifications of Level 3 and above and all have had relevant Safeguarding Children and First Aid training. The current Ofsted rating is "Outstanding."
- 3.4 The nursery currently provides spaces for 67 children. However, the nursery is in high demand, and there is a long waiting list of 200 applicants who are seeking childcare on Campus.
- 3.5 The proposed change of use and expansion will allow 55-56 Gordon Square to operate as an extension to the existing Nursery, which is currently in the basement level of 57-59 Gordon Square. This will help accommodate an addition of 13 children, bringing the total occupancy to 80 children on site. Increased occupancy will also necessitate an increase in nursery staff on site.
- 3.6 The existing student flat is vacant and is the perfect space into which the nursery can expand. The flat is also at basement level and will be well suited to providing additional nursery space, with the additional benefit of a larger rear garden in which additional external playspace can be provided.
- 3.7 The nursery is an essential important facility for UCL staff and students with Children, with the extremely high demand for the nursery testament to its long term success.
- 3.8 This application is supported by a Management Plan, outlining details on the capacity of the existing nursery, proposed capacity and demand, opening times, security and fire safety. A separate Emergency Plan provides further detail on fire safety and security.
- 3.9 This proposal has also been subject to detailed pre-application discussions with planning and conservation officers from LBC. The officers were supportive of the proposal and recognised the need to expand the existing facilities. The next section will describe the proposals in more detail.

4 The Proposals

Description of Development

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

"Change of use of the basement level of Nos.55-56 Gordon Square from sui generis (student accommodation) to D1 (nursery) and refurbishment works including internal and external alterations to the basement and external areas of Nos.55-59."

Summary of Proposals

4.2 The application is seeking a change of use at basement level of No.55-56. This will result in the loss of one student flat, and an increase in D1 floorspace for the nursery. A summary of the changes to floorspace for each use is set out in Table 1 below.

	Internal GIA (m²)	External Area (m²)	Total (m²)
Existing nursery (D1)	311	92	403
Existing student flat (sui generis)	107	148	255
Proposed nursery (D1)	418	240	658

Table 1: Floorspace summary

4.3 A summary of the internal and external works is set out below.

External Works

4.4 The external works include (but are not limited to) the following:

- Replacement of external doors to increase security and improve access;
- Laying of new surfaces to external areas to create safe play areas for the children;
- Pruning the existing fig tree to clear the space at low level; and,
- Installation of cast iron railings to match existing fence and application of safety mesh to existing railings to the rear of Nos. 55 and 56.

Internal Works

4.5 The internal works include (but are not limited to) the following:

- Forming an opening in the party wall at basement level between No.56 and No.57 to create a new doorway and access through the existing nursery to the new nursery space;
- Reconfiguration of modern partitions, including demolition of non-original stud work walls to increase space within the children's WC, whilst altering the layout of the kitchen and bathroom;
- Installation of new fittings, including sanitary ware and kitchen provisions; and,
- Renewal of finishes throughout and making good where necessary.

4.6 For a full description of the works, please refer to the Design and Access Statement, Architectural Drawings and Specification of Works prepared by Kendall Kingscott.

5 The Development Plan

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

The Local Development Plan

5.2 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.

5.3 The application will be assessed against LBC's Development Plan. The Development Plan comprises the following planning documents:

- 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).

5.4 The following plans should also be a material consideration when assessing the proposals against planning policy:

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

Site Allocations

5.5 The following policy designations apply to the application site and are identified in the Camden Policy Map:

- Central Activities Zone (A1 – University College London/University of London);
- Left wing of the Primrose Hill Background Assessment Area; and,
- Bloomsbury Conservation Area (Sub-area 2: Gordon Square/Woburn Square/Byng Place).

5.6 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.

6 Policy Assessment

Introduction

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

- Land Use (Student Housing and Education);
- Heritage and Design;
- Noise; and
- Trees.

Land Use

Student Housing

6.2 The Draft London Plan in Policy H17 'Purpose Built Student Accommodation' seeks to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that the accommodation provides adequate functional living space and layout.

6.3 The Camden Local Plan Policy H9 'Student Housing' seeks to ensure there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden and Camden's international academic reputation. Policy H9 resists development that involves the net loss of student housing unless it can be demonstrated that the existing accommodation is incapable of meeting contemporary standards or that the accommodation is no longer needed because the needs of students at the institution it serves can be better met elsewhere.

Education (Use Class D1)

6.4 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)*". Figure 2 shows that UCL is located within sub-section A1 of the CAZ (University College London/University of London). The sub-section is identified as an area of mixed use with a strong academic character.

6.5 London Plan Policy 3.18 'Education Facilities' states that the Mayor will support provision of childcare, primary and secondary school and higher education facilities to meet the demands of a growing and changing population. The provision of childcare facilities plays a key role in children's development and enables parents to go back to work. Boroughs should seek to address the shortage of childcare facilities in London.

6.6 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*".

6.7 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*".

6.8 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."*

6.9 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".

6.10 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"*.

6.11 Overall, the Camden Local Plan, and the current and emerging London Plans are supportive of the development and strengthening of any land uses that support the knowledge quarter in the Bloomsbury area, this includes education uses (D1).

Applicant's Response

6.12 The proposals will result in the loss of one student flat which provides two bedrooms and was previously occupied by a family. Although Camden's Local Plan policy H9 seeks to protect existing student accommodation. The unit is vacant and is no longer required. It is in poor condition, and has low standards of amenity for a student residence in comparison to other UCL student accommodation on campus. Given that it does not meet UCL's standards for student accommodation, and that the provision is not optimal on the site, the loss of the one unit is considered acceptable in this instance. During pre-application discussions, this was considered acceptable by the LBC planning officer.

6.13 The proposals will result in the change of use of the student flat to nursery. The new nursery space will act as an extension to the existing nursery. This change of use will support the provision of quality D1 spaces in the borough by delivering a modern and high quality expanded nursery space. Approval of the proposals will support UCL in this Central London location in LB Camden, where it contributes positively to the social and economic role in wider London, and the UK.

6.14 The proposed use is considered to be compatible with the central London location, and the location on the Bloomsbury Campus. There are no sensitive uses in the nearby vicinity and the nursery use is already well established and successful in this location.

6.15 The proposals have been developed in conjunction with the future users who will require childcare facilities and the current occupiers who manage the existing facilities. This means the space will be designed and finished with the end users in mind and will be ideally suited to its new long term use as a nursery.

6.16 The adopted and draft London Plan promotes and supports social infrastructure, education and community facilities, which includes nurseries. The proposed expansion of the nursery will benefit local staff and students by providing high quality childcare facilities in a central location. The site is located in the heart of UCL and as such, has the ability to serve UCL's staff and students to ensure high quality childcare needs are met. The nursery allow UCL staff and students to continue with their day-to-day activities, while leaving their children in a safe and controlled environment during working hours.

- 6.17 The site is easily accessible from other UCL properties and teaching spaces and is located within close proximity to public transport hubs – Euston Station (520 meters), Euston Square Station (420 meters) and Russell Square Station (360 meters). There are also very good cycle and pedestrian facilities around this site. Therefore, this site is considered to be within a very sustainable location to promote the expansion of the existing nursery.
- 6.18 Overall, the proposals will allow for the much-needed expansion of the existing nursery. This will ultimately support UCL's function as a global higher education facility, as it allows the children of UCL's staff and students to be placed in a safe environment while they attend to their day to day activities. The provision of additional floor space will increase the capacity of the nursery from 67 to 80 children. The new nursery is supported in this location in local and regional policy.

Heritage and Design

- 6.19 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.
- 6.20 Paragraphs 189-202 are of relevance. Paragraph 192 states that in determining applications, local 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;*
- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
 - *the desirability of new development making a positive contribution to local character and distinctiveness."*
- 6.21 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).
- 6.22 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.
- 6.23 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.
- 6.24 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".*
- 6.25 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.

- 6.26 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.
- 6.27 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.
- 6.28 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.
- 6.29 Material weight will be given to the Bloomsbury Conservation Area Appraisal and Management Strategy as the Site is located within Sub-area 2 of the Bloomsbury Conservation Area.
- 6.30 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

- 6.31 The proposals are seeking planning and listed building consent for internal and external refurbishment works in addition to the change of use discussed above. The building is Grade II listed, and is located in the Bloomsbury Conservation Area and nearby other statutory heritage assets. This section will assess the proposals against relevant policy by addressing the internal and external proposals separately below.

Internal Proposals

- 6.32 The main proposed intervention to the historic fabric of the building is the creation of a new doorway in the party wall between No.56 and No.57 at basement level. This will allow access through from the existing nursery into the new refurbished spaces in No.55-56. This intervention will result in less than substantial harm to the original plan form at basement level and to historic significance through the removal of some historic fabric.
- 6.33 When considering the historic and architectural significance of the building, the basement level has less significance than the upper floors. So the removal of historic fabric at this level has a reduced impact when considering the building as a whole. Additionally, the location of the doorway has been chosen so as to have minimal impact on the plan form of the rooms (it will be located in the corner of the room), and no impact on remaining architectural detail, such as fire places.

6.34 The proposed doorway is essential to allow access across the buildings from the existing nursery to the new spaces. The new opening will also ensure safe, level, internal access to these spaces, which would otherwise have to be accessed from the rear and the IoE service Road. This would not be an acceptable permanent access for the nursery.

6.35 Planning policy requires where less than substantial harm to the heritage asset is identified and overcome by the provision of public benefits which outweigh this harm. In this instance, the proposals will provide the following important public benefits:

- Provision of new and improved childcare facilities in a central London location for staff and students of UCL – this will enable staff and students to continue to work and study at UCL, a major higher education institution and an important contributor to the borough, the knowledge quarter and the CAZ.
- Provision of new external play areas for children to help their development.
- Refurbishment and continued maintenance of the building to ensure its longevity and continued contribution to the local area and the Conservation Area as a significant heritage asset – this will ensure continued public enjoyment of the listed building.
- Provision of new nursery floorspace and associated increased intake of children will necessitate the recruitment of new nursery staff – this will have a direct impact on local employment.
- The change of use of part of the basement will bring back into use a vacant area of the building – the new nursery use is considered to be an optimal use in this location and is already a long term and very successful occupier of the building next door.

6.36 The proposals also include the reconfiguration of modern partitions and the installation of new fixtures and fittings in the kitchen and bathroom spaces. These spaces contain no remaining original features and therefore there will be no impact to the listed building.

6.37 When considering the remainder of the refurbishment works, which are minor in nature and mostly relate to finishes, redecoration and making good, it is important to note that limited original features remain internally. This was highlighted during the site walk around and pre-application meeting with the conservation officer.

6.38 Where repairs to historic fabric are required in places, they will be carried out with careful consideration to the significance of the heritage asset. The proposals have been developed to be sympathetic to historic features and make good where necessary. This will ensure the longevity of the listed building through the delivery of high quality design in terms of finish and quality of space.

6.39 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 a public benefit. Other public benefits are explored in greater depth in Chapter 7.

External Proposals

6.40 No external alterations to the facade are proposed as part of this application. The design of the proposal will preserve the architectural interest of the property and will have no detrimental impact on the character of the Conservation Area or the setting of neighbouring listed buildings.

6.41 The proposals do include the replacement of the existing external rear door of No. 56. However, this door is not historic nor significant. Its replacement with a new door of a simple design will have a negligible impact on the significance of the listed building, but will considerably improve safety.

- 6.42 The installation of additional railings to the rear of Nos. 55 and 56, and addition of safety mesh to existing non-historic railings will have minimal visual impact. The design of the proposed railings is in keeping with the existing railings. The installation of the safety mesh will be entirely reversible. The nursery faces a service road, therefore insuring the appropriate protection (fence and mesh) in place is essential to avoid any accidents. Further detail on design changes to the external railings and boundary wall is detailed in the DAS and submitted drawings.
- 6.43 The proposals also include the installation of a new floor covering to the external areas to the rear of the building. The proposed material and fixing method has been carefully considered to ensure that the remaining original flag stones in this location remain unharmed. The proposed installation would be reversible should it be removed in the future and is required to create a safe play area for the children in this otherwise unused external space.
- 6.44 Overall, the proposals are considered to have a positive impact to the significance of the listed building and the Bloomsbury Conservation Area. Due to the limited scope of the proposals, the works will not have an impact on neighbouring heritage assets. The proposals will deliver a number of heritage benefits, as follows:
- The internal and external works will ensure the longevity and ongoing maintenance of the listed building.
 - The proposals will make good internal and external finished wherever possible.
 - The proposals will remove tired modern fabric and install new high quality fixtures and fittings befitting of the proposed use.
 - The proposals will bring back into use the external areas to the rear of the property that are currently unused and overgrown.

Trees

- 6.45 Camden Core Strategy Policy CS15 and London Plan Policy 7.21 promote the protection of trees, and requires replacement trees to be provided should development result in a loss of trees.

Applicant's Response

- 6.46 In August 2019, a tree survey was carried out in accordance with British Standards. The existing mature fig tree falls under 'Category B' and is seen to be of moderate to high value and considered to be of such a condition to make a significant contribution (over 20 years). The tree is protected by a TPO due to its location within a conservation area.
- 6.47 The tree on site is to be retained and will be made into a feature for the external play area. The Arboricultural Report recommends the removal of deadwood and stubs and to undertake a selective crown reduction and crown lift to ensure appropriate clearance over the adjacent service road. The proposals will ensure to safeguard the continued contribution of the tree to the local landscape.

Noise

- 6.48 Policy A4 of the Camden Local Plan seeks to ensure that noise and vibration is controlled and managed.

Applicant's Response

- 6.49 The proposal will provide an increased area of external play space to the rear of the properties. The time that the children spend outside is strictly timetabled to actively control associated noise and is limited to normal working hours. There are no sensitive uses nearby and the area is characterised by other D1 uses and occupiers.
- 6.50 An acoustic assessment has been prepared by Environmental Equipment Corporation Ltd to accompany this application. It demonstrates that the proposals will comply with local policy in relation to noise.

7 Benefits of the Proposals

7.1 Overall, it is considered that the proposals strike a balance between the expansion of the existing nursery with minimal harm to the heritage asset, and the delivery of public and heritage benefits.

7.2 In summary, the considerable public benefits and heritage benefits of the proposals include:

- The proposals will **expand the existing nursery** through increasing the floorspace by 107 m².
- The expansion of the nursery will **alleviate pressures on the waiting list** through **increasing the capacity of the nursery from 67 to 80 children**. This will enable more parents to **find suitable childcare for their children and attend UCL**.
- The provision of **additional social infrastructure** in this location will ultimately **support UCL staff and students** with children. The **work of staff and students at UCL** is integral to its **success** as a major higher education institution and **an important contributor** to the **borough**, the **knowledge quarter** and the **CAZ**.
- The proposals will lead to the **optimised use of the existing student flat**, which has been vacant since Spring 2019 and is currently in poor condition. **The new nursery use is considered to be an optimal use in this location** and is **already a long term** and very **successful occupier** of the building next door.
- The proposals will **improve the user environment** of the existing nursery for the children.
- The proposals will **bring back into use the external areas** to create a **new external play area** for the children.
- Provision of new nursery floorspace and associated increased intake of children will necessitate the **recruitment of new nursery staff** – this will have **a direct impact on local employment**.
- The proposals will **improve access** at basement level between nos. 55-59.
- **Historic features will be retained and restored** wherever possible.
- The proposals will contribute to **the maintenance of the heritage asset**, ensuring its longevity and maintaining its **contribution to the Bloomsbury Conservation Area**.
- **Modern additions will be stripped out** wherever possible **to reinstate the architectural interest** of the building.

8 Conclusions

- 8.1 This planning and listed building consent application is for the expansion of the existing nursery and internal and external refurbishment works.
- 8.2 The existing nursery located in the basement of No.57-59 is operating at full capacity and provides spaces for 67 children. It has a long waiting list of 200 applications, and its expansion is desperately required in order to meet demand.
- 8.3 Adjacent to the existing nursery at basement level of No.55-56 is one student flat which is vacant and under-utilised. It is provided in a sub-optimal location and is tired. It is proposed to change the use of this student flat (sui generis) to nursery (D1) providing an additional 107 m² of D1 floorspace. This is in line with the upper floors of No.55-59 which are already in D1 use.
- 8.4 To enable this, the proposals include specific interventions such as the creation of an opening for a new doorway in the party wall at the basement level between No. 56 and 57, reconfiguration of modern partitions and installation of new fixtures, fittings, surfaces and safety features. These interventions will largely result in heritage benefits to the Grade II listed building and the Bloomsbury Conservation Area. However, the new opening in the party wall will result in minor harm to the listed building.
- 8.5 This planning statement has set out that this minor harm is outweighed by the provision of public and heritage benefits. This proposal therefore meets the requirement of national and local policies on heritage impacts of development proposals.
- 8.6 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 Heritage Statement.
- 8.7 In addition to heritage impact, 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.
- 8.8 For these reasons, it is considered that planning and listed building consent should be granted for these proposals.

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Real Estate

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