Deloitte.
Real Estate

Planning, Design, Access and Heritage Statement

Planning and Listed Building Consent Application
The Slade School of Art – Scope A

April 2020

Table of Contents

1 Introduction

1.1 On behalf of our Client, University College London ('UCL'), this Planning, Design, Access and Heritage Statement has been prepared in support of a planning and listed building consent application for external refurbishment works at the Slade School of Art ('the Site'). The description of development is set out below:

"External refurbishment, repair and maintenance works to the Slade School of Art to improve its thermal performance, including the replacement of roof lights to roofs 4-7 with new double glazed units, replacement and renovation works to the windows, repairing existing slate and asphalt roofs, light clean to the front elevation, the erection of scaffolding to carry out these works and associated works."

Report Structure

1.2 The National Planning Policy Framework (NPPF) provides the Government's national planning policy on the conservation of the historic environment. In respect of the information required for applications, it states that:

"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance"[1].

1.3 A Design and Access Statement (DAS) is also a national requirement under the NPPF.

1.4 In light of these requirements this Report is structured as follows:

- Section 2: Site context, including a Site history.
- Section 3: The Proposals and access statement.
- Section 4: Legislative and policy context for this assessment.
- Section 5: Assessment of significance.
- Section 7: Assessment of impact.
- Section 8: Policy assessment.
- Section 9: Summary & conclusion.

Research Methodology

1.5 The assessment has been carried out in accordance with the statutory duties of The Planning (Listed Buildings and Conservation Areas) Act 1990 and the policies of the National Planning Policy Framework (NPPF).

1.6 The baseline assessment has been undertaken using a combination of desk-based study and fieldwork to identify and assess the heritage significance of the potentially impacted heritage assets and to establish the impact on their significance. The following survey and data sources have been used:

- National Heritage List for England (Historic England (HE));
- The London Borough of Camden (LBC);
- Detailed visual Site inspections carried out by the Architect, Mark Hines; and

[1] DCLG (2019) National Planning Policy Framework (NPPF), Paragraph 189.

- Other published sources of information which are referenced where relevant.

Authorship

1.7 The report has been prepared by Deloitte Real Estate; a real estate consultancy comprising planning and surveyors as part of Deloitte LLP.

Authors: Ellie Bird (BA (Hons), MSc, MRTPI) and Dena Dabbas (BA (Hons), MSc).

2 Site Context

Site Location and Surrounding Area

2.1 The Site comprises the North Wing of the Wilkins Building and is home to the Slade School of Art.

2.2 The Wilkins Building is a Grade I-listed building, first listed in 1954 (list entry: 1113056). It is located in the Bloomsbury Conservation Area, within Sub Area 3, 'London University/British Museum'. There are a number of other designated heritage assets in close proximity to the Site including Grade II-listed 23 Gower Place (list entry number: 1322168), and the Grade II listed Kathleen Lonsdale Building ('KLB') (list entry number: 1322169). Other nearby statutorily listed buildings are identified later in this section.

2.3 The Site is recognised as an exceptional institution of national and international importance, and has been housed in the same building since its opening in 1871. The Site is located in the London Borough of Camden ('LBC') within the UCL Bloomsbury Campus. It is bounded by the Pearson Building to the west, the Kathleen Lonsdale Building to the north, the Main Wilkins Building to the east and the Main Quad to the south.

2.4 As seen below in Figure 1, the Site is at the heart of the Bloomsbury Campus and surrounded by other owned and occupied UCL Buildings.

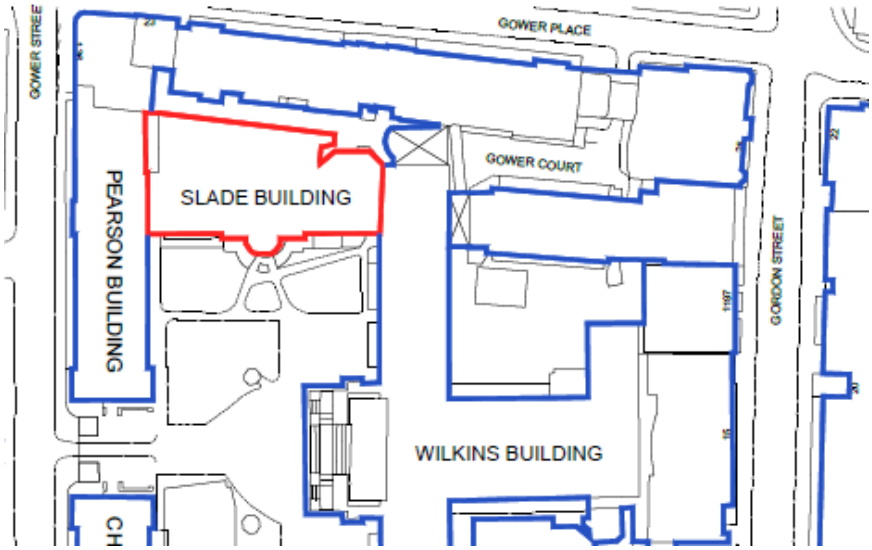

Figure 1: Extract of Site location plan (drawing ref. 100-01 Rev A)

2.5 In the immediate vicinity of the Site, the area is characterised by buildings in D1 (higher education) use reflecting its location at the core of UCL's Bloomsbury Campus. Other nearby uses include University College Hospital and Euston Square Underground Station.

2.6 The building comprises three storeys plus basement. The elevations are clad in Portland stone and fair-face London stock brickwork under lead and copper roofs. The basement extends to the front of the building under the Quad area with roof lights providing natural light, and also extends to the rear as a single storey building in traditional construction under a mixture of saw-tooth slated pitched and asphalt flat roofs, with a recent modern extension under a metal clad barrelled roof.

Wider Area History

2.7 The wider area of Bloomsbury represents a period of London's early expansion, dating from around 1660. Much of the Bloomsbury area since 1669 has been managed and developed by the Russell Family and is today managed by the Bedford Estate office in London. The first wave of development included a mix of uses with houses, a market, commercial, hospitals and churches[2].

2.8 The Victorian era (1837-1901) saw Bloomsbury evolve with a movement of the wealthy to newly developing urban and suburban areas to the north. New uses, specifically industrial ones, emerged and existing ones expanded[3]. This included the establishment of University College, an expansion in specialist hospitals around Queen Square and development of cultural uses such as the British Museum. By the 1930s, much of the original Bedford Estate housing disappeared beneath university blocks and modern hotels. Many houses were converted into offices, altering the appearance and landscape of many of these spaces.

2.9 In 1927, the University of London (UoL) purchased an 11.5 acre Site north of the British Museum from the Bedford Estate. After the war, academic development around Bloomsbury intensified as compulsory powers were available for the purposes of education use. In the present day, Bloomsbury is considered a fashionable residential area and is the location of a number of cultural and educational institutions[4].

Figure 2: Bloomsbury, 1746 (source: John Rocque detailed 1746 map, accessed 27 March 2020) [site shown indicatively in red]

[2] https://www.british-history.ac.uk/old-new-london/vol4/pp480-489, accessed 10 March 2020
[3] https://blog.history.ac.uk/2016/05/a-visual-history-of-bloomsbury/, accessed 10 March 2020
[4] https://www.foxtons.co.uk/local-life/bloomsbury/, accessed 10 March 2020

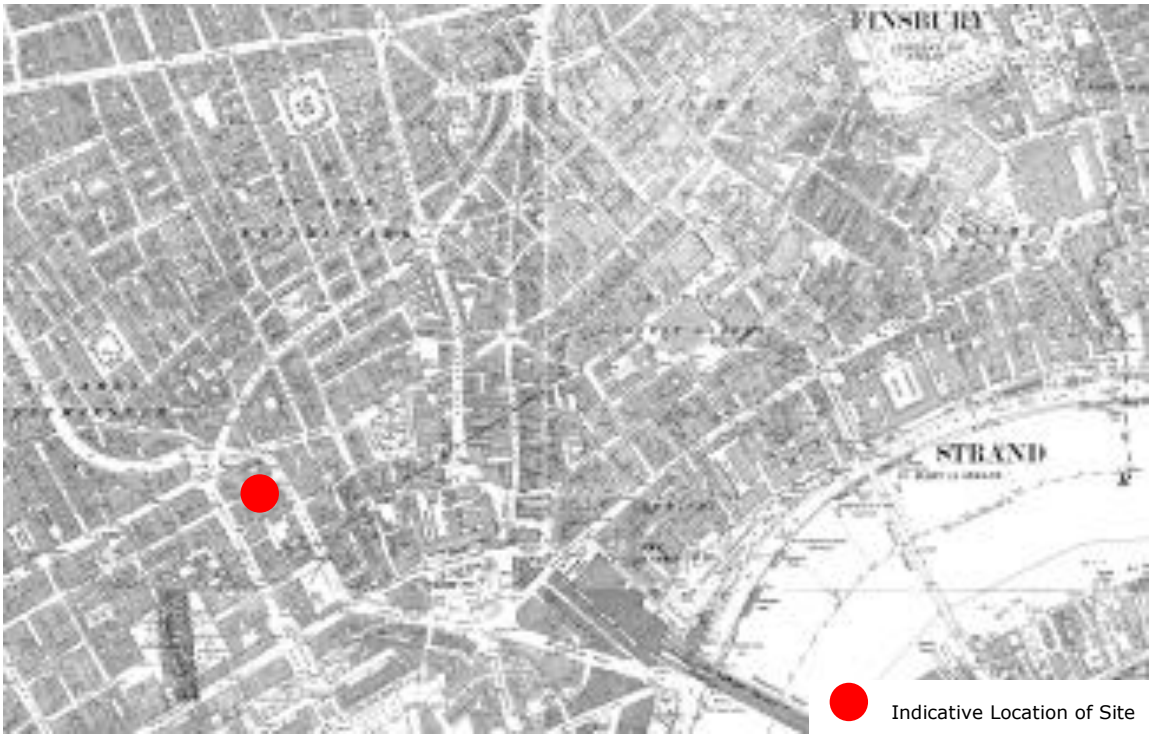

Figure 3: Bloomsbury, 1869-80 (source: locatinglondon.org, accessed 27 March 2020) [site shown indicatively in red]

Figure 4: Bloomsbury, 1920s (source: collectorsprints.com, accessed 27 March 2020) [site shown indicatively in red]

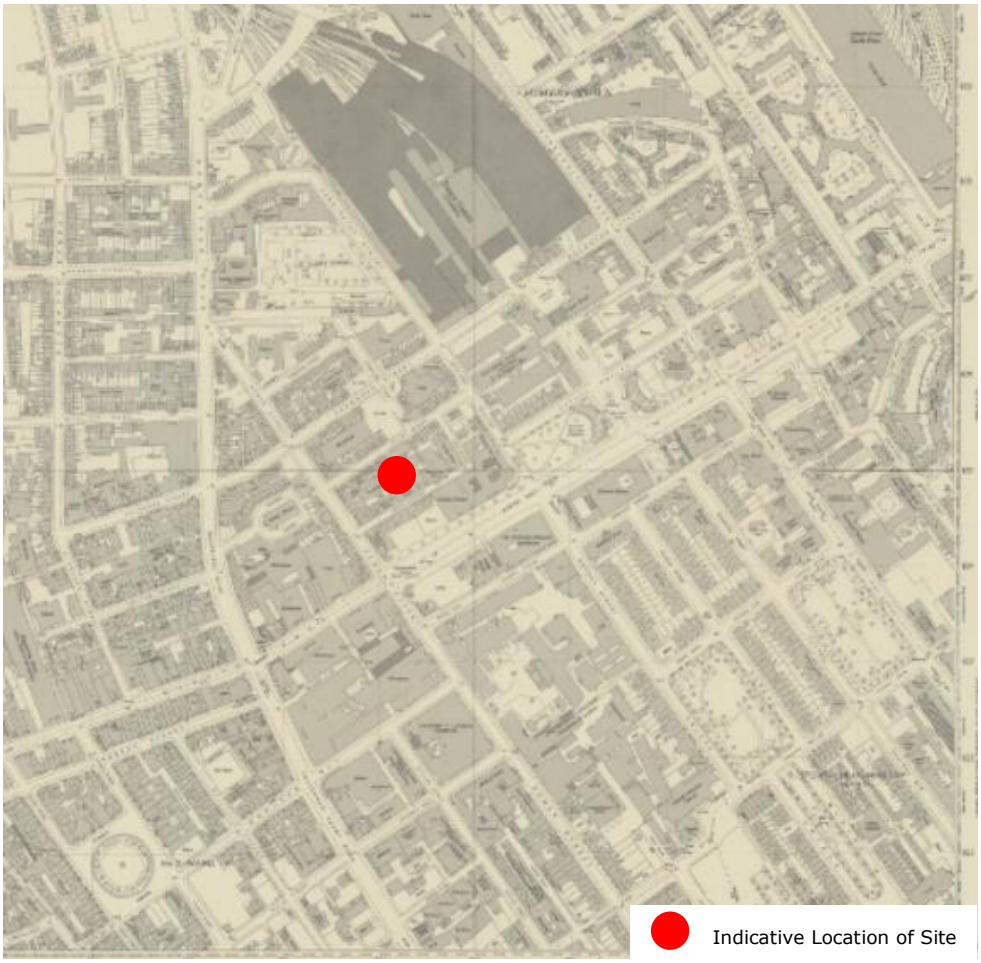

Figure 5: Bloomsbury, 1951 (source: maps.nls.uk, accessed 27 March 2020) [site shown indicatively in red]

Site History

2.10 UCL was founded on 11 February 1826 under the name London University, as a secular alternative to the religious universities of Oxford and Cambridge. In 1827, a year after the founding of UCL, construction of the Octagon Building (term used for the whole main Wilkins building) began on Site, in an area previously used as a drilling ground and rubbish-dump. The Octagon was designed by the Architect William Wilkins, who also designed the National Gallery[5].

2.11 UCL is the first higher education institution in England to accept students of any race, class or religion. The Slade School of Fine Art was founded at the College in 1871, following a bequest from Felix Slade, who envisaged a school where fine art would be studied within a liberal arts university. The North Wing (the Site) was constructed in phases to limit the University's risk and allow the new department to occupy the building quickly. Today, the Slade offers courses in painting, sculpture, fine-art media, photography, film, video and sound. There are approximately 206 students, spread equally between undergraduate and postgraduate courses[6].

[5] http://www.victorianweb.org/art/architecture/london/98.html
[6] https://www.ucl.ac.uk/slade/about, accessed 21 March 2020

Figure 6: First recorded image of the Wilkins Building (1826 – 1904) (UCL College Archives, n.d.)

Figure 7: Wilkins Building (1826-1904) (UCL College Archives, n.d.)

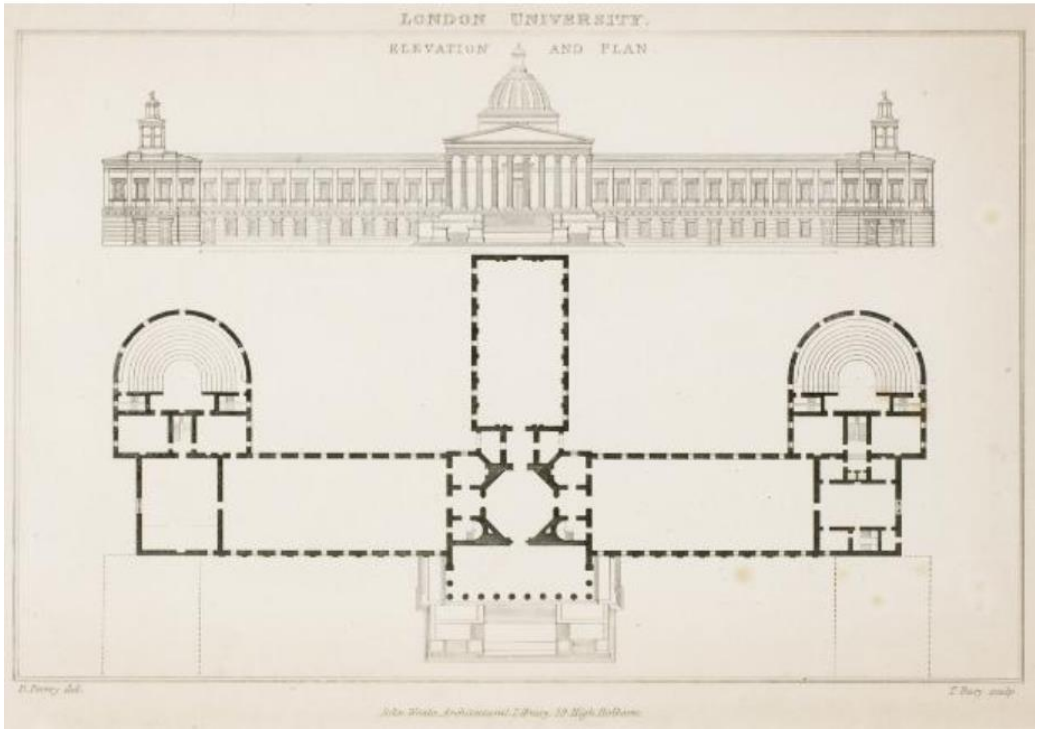

Figure 8: Early Plan of the Wilkins Building (UCL College Archives, n.d.)

Figure 9: North Wing today (source: Rebecca Coxon, Fulkers)

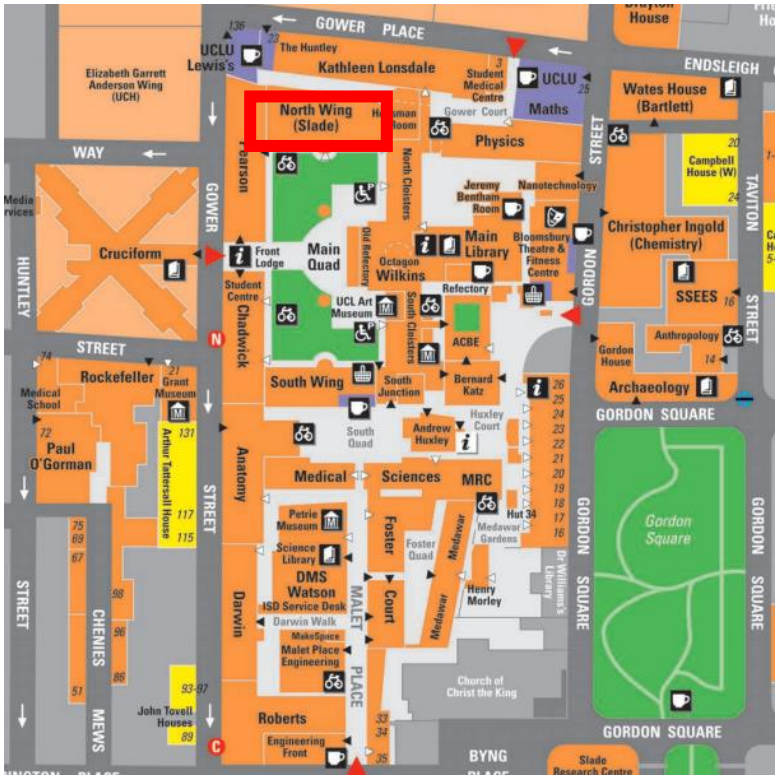

Figure 10: Location of the Site (Extract of UCL Bloomsbury Campus Map, UCL) (the Site is identified by the red line.)

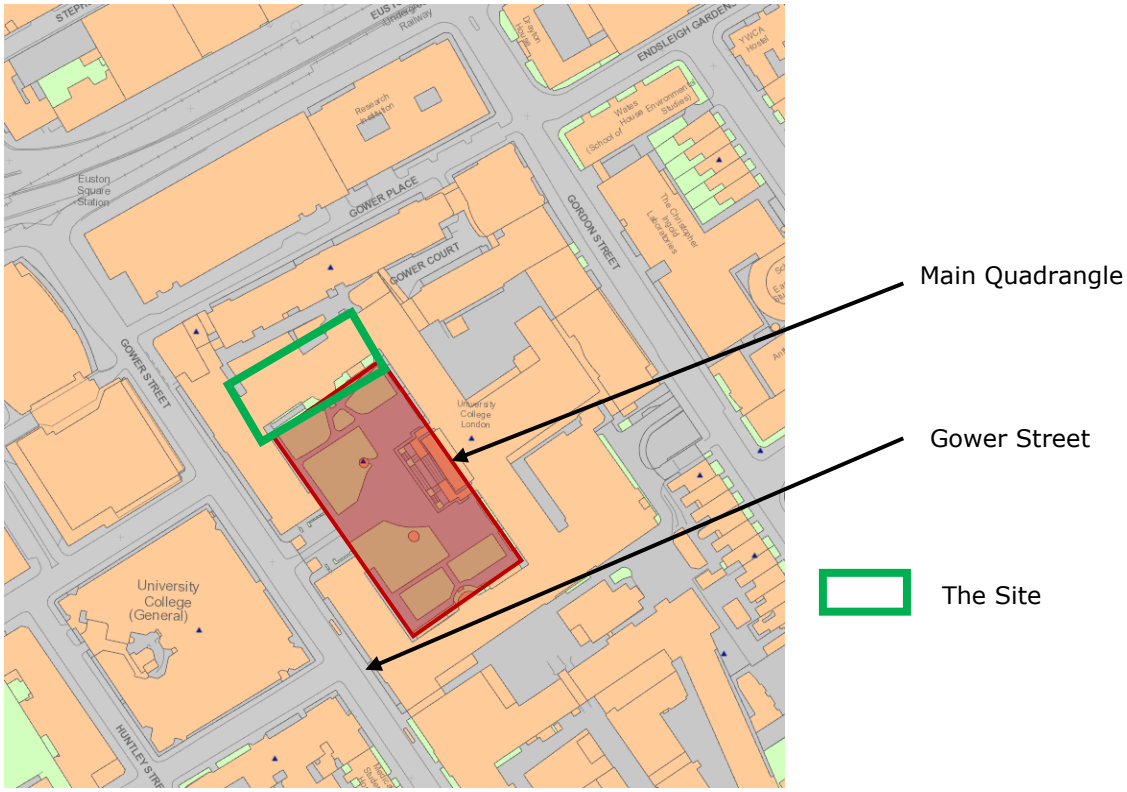

Figure 11: Streets within the Bloomsbury Conservation Area with views to the Site

Heritage Assets

The Site

2.12 The Site forms part of the Wilkins Building, which is Grade I listed and was listed in 1954 (list entry: 1113056).

Bloomsbury Conservation Area

2.13 The Site is wholly within the Bloomsbury Conservation Area, within Sub Area 3, 'London University/British Museum'

2.14 The initial designation of Bloomsbury as a conservation area took place in 1968, to protect elements of development from the Georgian and earlier eras but excluded areas where there had been significant later redevelopment. There have been numerous subsequent extensions reflecting a growing appreciation of Victoria, Edwardian and high quality 20th Century architecture.

2.15 Due to the size, complexity and diversity of the Bloomsbury Conservation Area, its appraisal has been structured on a 'street by street' basis. The Site is located in the setting of the following assessed streets of the Conservation Area and therefore the proposal's impact on the significance of these has been assessed:

- UCL Main Quad – Although not classified as a 'street', it is the public realm directly facing the Site.
- Gower Street – The street to the west from which the Site is accessed.

Views from within the Conservation Area

2.16 None of the key views identified within the Bloomsbury Conservation Area Appraisal include or are impacted by the Site. They are not assessed as part of this report.

Listed Buildings

2.17 The UCL Bloomsbury Campus is home to over 50 listed buildings.

2.18 In November 2019, a Site visit was undertaken to understand the zone of influence for any proposed works. It was noted that beyond an 80m radius, the Site was not experienced any further. Although the setting for the building could be considered to be the whole UCL campus, for these types of works, the potential impact to the setting of listed buildings which are not immediately adjacent will be extremely limited. Therefore, it was concluded that the majority of the listed buildings within the Bloomsbury Campus do not have a relationship, either visible or contextual (e.g. sharing a setting), with the Site whereby the proposals could impact their setting. On the Site visit, various views were informally assessed in coming to this conclusion.

2.19 Given the above, only four listed buildings share a visible relationship with the Site and/or share a setting, and could potentially be impacted by the works. The listed buildings taken forward for full assessment, in addition to the Wilkins Building itself, are the following:

- Kathleen Lonsdale Building (KLB) – Grade II listed (list entry: 1322169)
- Two Observatories in the Main Quadrangle – Grade II listed (list entry: 1113064)
- Cruciform Building – Grade II listed (list entry: 1113059)
- 23 Gower Place – Grade II listed (list entry: 1322168)

2.20 12 below sets out the assets which will be taken forward for assessment within this Heritage Statement and their relationship to the Site.

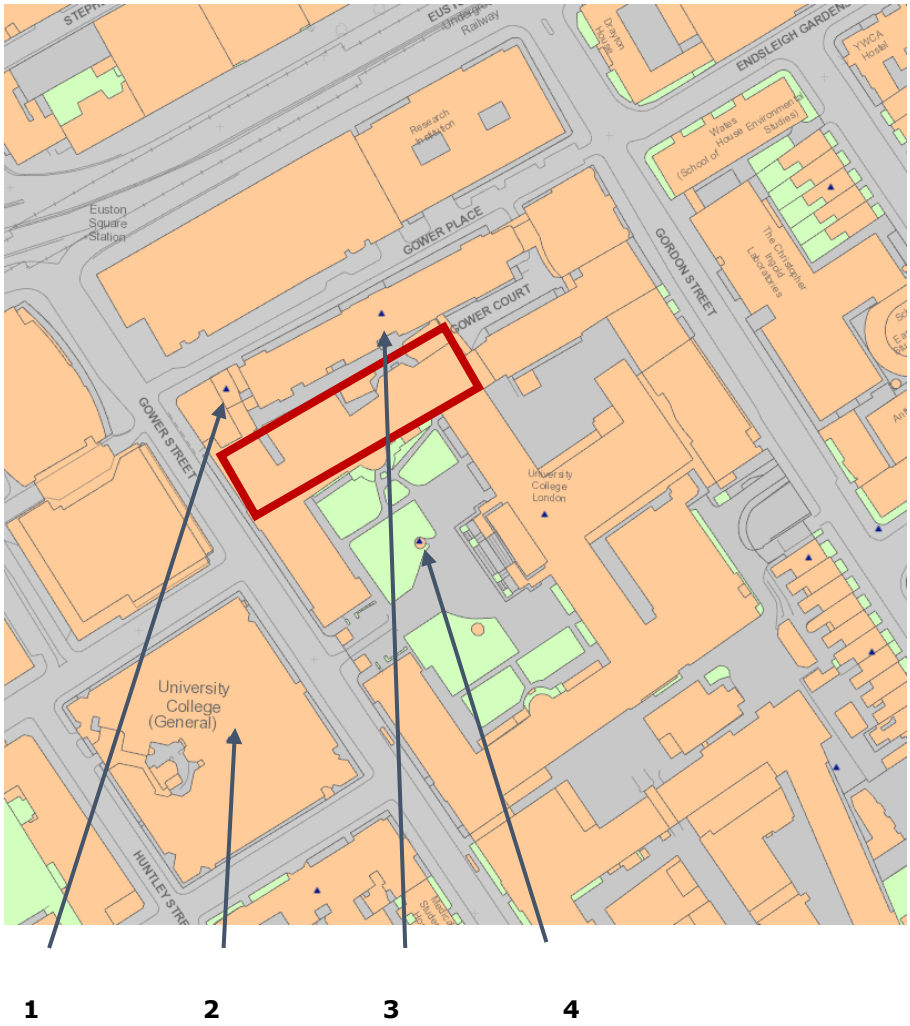

Figure 12: Extract of Map, National Heritage List for England (NHLE) (Site indicated approximately by red line)

No.	Building Name	Listing	Listing Reference
1	Kathleen Lonsdale Building (Grade II)	II	1322169
2	Cruciform Building (Grade II)	II	1113059
3	23 Gower Place (Grade II)	II	1322168
4	Two Observatories in the Main Quadrangle	II	1113064

Table 1: Heritage Assets to be assessed within this report

Non Designated Heritage Assets

2.21 There are a number of non-designated heritage assets (locally listed buildings by the London Borough of Camden) which are located within the UCL Bloomsbury Campus, but none have a visible relationship and / or share a setting with the Site, and have the potential to be impacted by the proposals. Therefore, no non-designated heritage assets have been taken forward for assessment within this statement.

3 The Proposals

Summary of the Proposals

3.1 UCL is seeking to refurbish, repair and maintain the external façade, windows and roof lights of the building, subject to Planning and Listed Building Consent. In brief, the works comprise the following:

- Replacement of roof lights to roofs 4-7 with new double glazed units;
- Draught proofing to windows at the front of the building;
- Renovation works to windows across the building to repair building fabric and joinery where required;
- Replacing the second floor clerestory windows with new single glazed units;
- Erection of temporary scaffolding for a light clean to the front elevation;
- Light touch clean to the elevations; and
- Repairing existing slate and asphalt roofs 9-13 and copper roof 17.

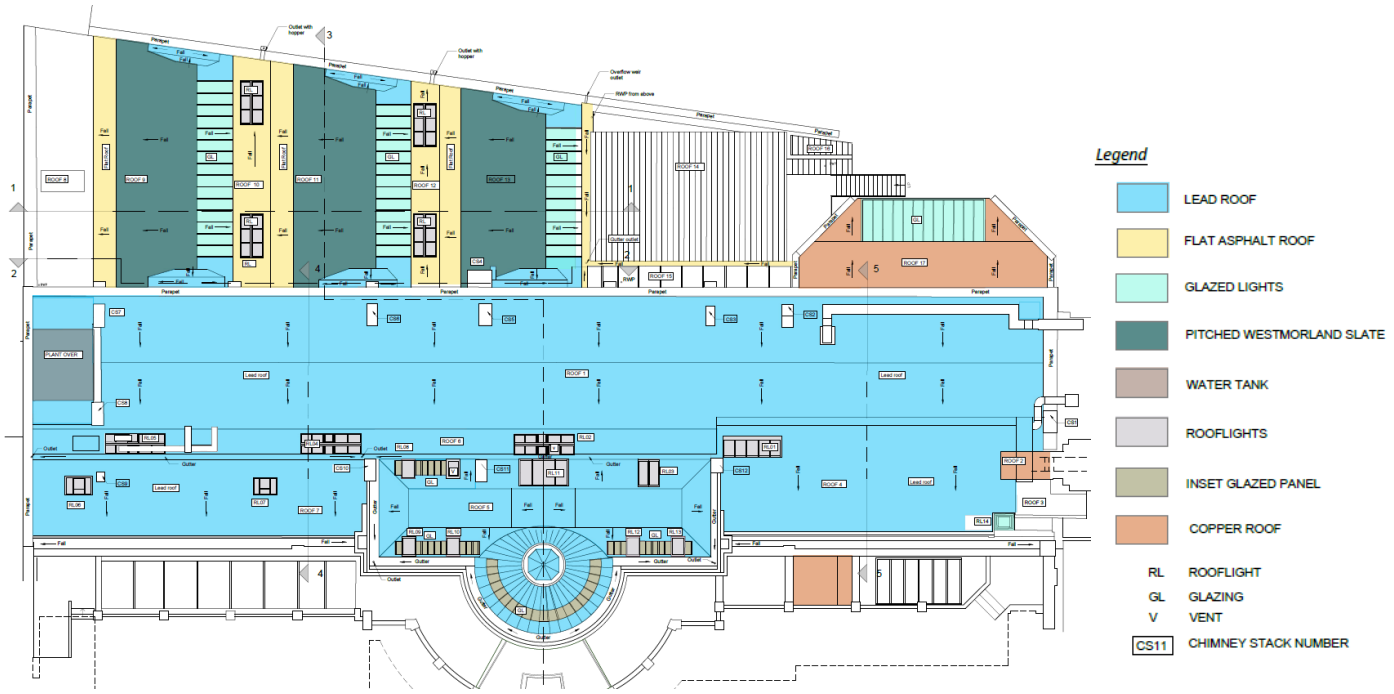

Figure 13: Roof Plan (drawing ref. 19-2306)

3.2 The main drivers for the works to the roofs and roof lights are improvements in thermal performance and energy efficiency and to ensure that this significant building is properly maintained and protected against water ingress and wear and tear.

3.3 A Sustainability Statement has been prepared by Burohappold to support this Planning and Listed Building Consent application. UCL cost and carbon tool calculations estimate upgrading roof windows, roof lights and clerestory glazing will result in a high level of energy and carbon savings. The submitted Sustainability Statement includes a commentary against the Camden Sustainability Checklist under Policy CGP3 and Part L2B of the Building Regulations.

3.4 The proposals will not affect the existing internal layout of the building.

3.5 The proposed works have been designed taking full consideration of the special interest of the listed building and the conservation area.

3.6 A summary of the works is provided below. However, this Planning, Heritage and Design and Access Statement should be read in conjunction with the full application package.

Roof Lights

3.7 Roofs 4-7 will be replaced with double glazed units to improve thermal performance and U-value of the building. Figure 11 is an example section detailing the proposed works to the roof lights.

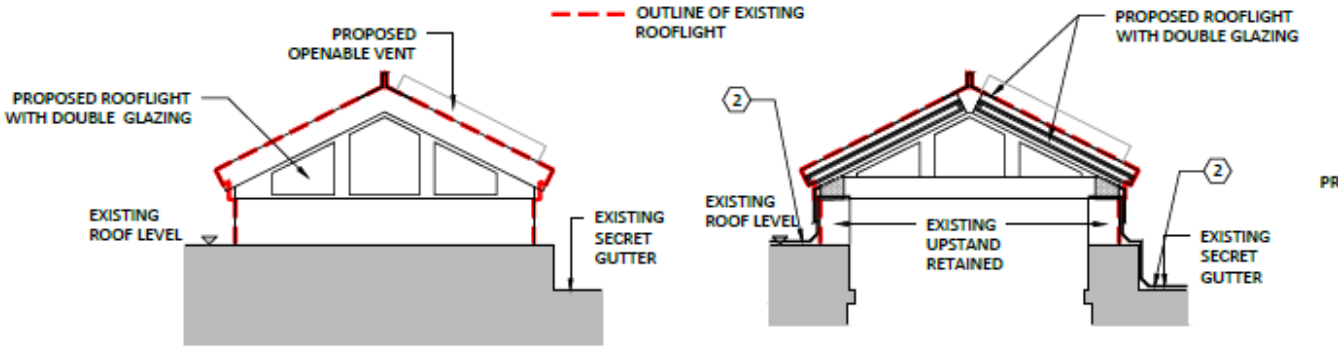

Figure 14: Detailed section of the roof lights in roofs 4-7 (drawing ref. 200-11)

Replacement of Clerestory Windows

3.8 New windows and glazing will match existing. The cill height will be raised by 75mm or 150mm depending on the window type. This is further detailed in the accompanying drawings.

Repairing Slate and Asphalt Roofs

3.9 Roofs 9-13 will be replaced on a like-for-like basis as set out in drawing ref. 200-26 'Roof Plan – Proposed Roof Repairs.'

3.10 Where necessary, existing gutters and downpipes will be replaced with new coast iron units to match existing.

Light Touch Clean and Repairs to the Façades

3.11 Scaffolding will be erected for a short period of time to allow for light touch cleans to the front façade and repairs to the roofs. Repair and cleaning works will be carried out sensitively. The extent of scaffold ties are shown in drawing ref. FKR-3988-01-DR-01 to 08 inclusive.

3.12 Ties to the front elevation are shown as located above the projecting stone corbels meanwhile ties to the rear elevation are shown fixed to the brickwork.

3.13 Where cracks are found, they will be cleaned to remove debris, dust and dirt.

3.14 Replacement stone inserts and units will match the existing.

Pre-Application Discussions

3.15 The scheme proposed has been subject to discussions with LBC Planning and Conservation Officers and the designs have evolved accordingly.

3.16 At the meetings and Site visits, the background, need and method of carrying out the proposals was explained and presented. The officer was supportive of the proposed works subject to agreeing detail and methodologies where appropriate. The officers understood the need to improve comfort for the occupants and achieve thermal and energy savings through replacement of roof lights and repairs to roofs where necessary, especially where this is work to non-original and / or low significance fabric.

3.17 Different options for the erecting the scaffolding were thoroughly discussed. The applicant demonstrated why fixing the scaffolding using limited tie in points to the building was the only practical solution. This was due to the practical limitations of the Site's location (the main quad being an important area of public realm and containing mature trees, and the rear of the building comprising a narrow service yard area of the Kathleen Lonsdale Building). Having demonstrated that alternative fixing methods had been thoroughly explored and discounted for justifiable reasons, officers were satisfied with the proposed approach. The Conservation Officer requested information on the number, size and location of physical fixings. This has been issued within the pack of architectural drawings.

Access Statement

3.18 Access to and into the building will remain unchanged and the proposals do not relate to access. The temporary scaffolding erected for a short period of time will not impact access into the building.

4 Policy and Guidance

The Planning (Listed Building and Conservation Areas) Act 1990

4.1 As the proposals concern a Grade I listed building and it is in the vicinity of other listed buildings, Section 66 of the Act is relevant. This requires the Local Planning Authority to "*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possess*" when considering whether to grant planning permission.

4.2 As the Site is situated within a Conservation Area, Section 72 of the Act (which requires the Local Planning Authority to pay special attention to the "*desirability of preserving or enhancing the character or appearance of that area*") is directly relevant to the Proposed Development.

National Policy

National Planning Policy Framework (NPPF) (2019)

4.3 The National Planning Policy Framework (NPPF) is a material consideration in the determination of planning applications and articulates the priorities of The Plan for Growth within planning policy. The NPPF introduces a 'presumption' in favour of sustainable development and supports proposals that are in accordance with policies in an up-to-date Development Plan. Sustainable development is about positive growth which supports economic, environmental and social progress for existing and future generations.

4.4 Section 6 (paragraphs 80 to 84) is titled 'Building a strong, competitive economy'. It emphasises the Government's commitment to support economic growth, including that the planning system should help create conditions in which businesses can thrive.

4.5 Section 12 (paragraphs 124 to 132) is titled 'Achieving well-designed places'. It states that the planning process in fundamental to creating high-quality buildings and places. Good design is key to sustainable development and contributes to creating better places in which to live and work. It outlines that developments should aim to:

- Add to the overall quality of the area and function well over the lifetime of the development.
- Be visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
- Be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).
- Establish or maintain a strong sense of place, using arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.
- Optimise the potential of the Site, create and sustain an appropriate mix of uses.
- Create safe, inclusive and accessible environments which promote health and wellbeing.

4.6 Section 16 (paragraphs 184 to 202) is titled 'Conserving and enhancing the historic environment'. Heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. When determining a planning application the local planning authority should take account of the desirability of sustaining and enhance the significance of heritage assets and consider if a new development makes a positive contribution to the local character and distinctiveness.

4.7 A heritage asset is defined as a building, monument, Site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets includes designated heritage assets identified by the local planning authority (including local listing). A designated heritage asset is defined as a World Heritage Site, Scheduled Monument, listed building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

4.8 Paragraph 189 states that when submitting a planning application, the applicant should describe the significance of any heritage asset affected, including any contribution made by their setting. It goes on to state that the level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on the asset's significance.

4.9 The NPPF defines significance as *"the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting"* (NPPF, Annex 2).

4.10 Paragraph 192 states that in determining planning applications, local authorities are required to 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 the sustainable communities including the economic vitality; and***
- ***The desirability of new development making a positive contribution to local character and distinctiveness."***

4.11 The NPPF stresses that 'great weight' should be given to the conservation of designated heritage assets (NPPF paragraph 193), emphasising the need to avoid substantial harm, in terms of demolition, alteration or the compromise of an asset's setting.

4.12 The NPPF requires any harm or loss to have clear and convincing justification, with substantial harm to or loss of a Grade II listed building or registered park and garden to be the exception and any substantial harm to Grade I or II* listed buildings and registered parks and gardens to be wholly exceptional. Less than substantial harm to any designated heritage assets must be weighed against the public benefits of the proposal, including securing the asset's optimum viable use. The fundamental objective is to ensure that the balance of the impact on the heritage assets is demonstrably beneficial, minimising any negative impact on their significance.

4.13 The NPPF defines 'Setting' at Annex 2 as:

"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."

4.14 Paragraph 197 also requires the effect on the significance of a non-designated heritage asset to be considered during determination, with a balanced judgement required having regard to the scale of any harm or loss of the significance of the asset.

4.15 In regards to the setting of heritage assets, the NPPF directs local authorities to look for opportunities for new development which enhance or better reveal their significance. Paragraph 200 states that *"proposals that preserve those elements of the setting that make a positive contribution to (or better reveal the significance) of the asset should be treated favourably".*

National Guidance

National Planning Policy Guidance

4.16 Planning Practice Guidance (PPG) was introduced in March 2014 as a live web-based resource to support the NPPF. It brings together planning practice guidance for England in an accessible and usable way and is a material consideration in assessing this application.

4.17 The PPG recognises that the conservation of heritage assets in a manner appropriate to their significance is a core planning principle, requiring a flexible and thoughtful approach to get the best out of assets. It states that *"Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals".*

4.18 In considering the setting of a heritage asset, PPG considers that a thorough assessment should be "*proportionate to the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it*".

4.19 PPG acknowledges that substantial harm is a high test, and that it is the degree of harm to the significance of an asset, rather than the scale of the development, which is to be assessed.

Conservation Principles

4.20 Historic England's Conservation Principles (2008) laid the bedrock for the principles set out in the NPPF regarding the historic environment, and provides guidance on the policies in the NPPF, particularly on understanding significance, with Paragraph 151 stating that:

"The greater the significance of a place to society, the greater the weight that should be attached to sustaining its heritage values. This concept of 'proportionality' relies on judgement rather than formulae, but is fundamental to equitable reconciliation of the public interest in heritage with other public and private interests."

4.21 Guidance is also provided on decision making in relation to proportionality with Paragraph 5.4 stating that:

"If conflict cannot be avoided, the weight given to heritage values in making the decision should be proportionate to the significance of the place and the impact of the proposed change on that significance."

4.22 Detail is also provided on the four values highlighted in the NPPF's definition of significance:

- ***"Evidential (archaeological) value derives from the potential of a place to yield evidence about past human activity.***
- ***Historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative.***

- ***Aesthetic (architectural and artistic) value derives from the ways in which people draw sensory and intellectual stimulation from a place.***
- ***Communal value derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory."***

4.23 With regards to 'setting', the document states that the "*definition of the setting of significant place will normally be guided by the extent to which material change within it could affect (enhance or diminish) the place's significance"*.

4.24 An updated version of Conservation Principles has been published in draft. The most notable change is to the definition of significance, which is narrowed to three areas: historic interest; archaeological interest; and architectural or artistic interest. This proposed change would align the document more closely with the NPPF. The updated draft document is also more concise with less detail, for example on setting.

Historic Environment Good Practice Advice in Planning, Note 3 – The Setting of Heritage Assets (2nd Edition) (2017)

4.25 This document sets out guidance, against the background of the NPPF and the related guidance given in the PPG, on managing change within the settings of heritage assets, including archaeological remains and historic buildings, Sites, areas, and landscapes.

4.26 It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting. The suggested staged approach to taking decisions on setting can also be used to assess the contribution of views to the significance of heritage assets.

4.27 It replaces *The Setting of Heritage Assets: Historic Environment Good Practice Advice* in Planning Note 3 – 1st edition, (2015) and *Seeing the History in the View: A Method for assessing Heritage Significance within Views* (English Heritage, 2011).

4.28 The guidance recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to the complexity of the case, from straightforward to complex:

- ***"Step 1: Identify which heritage assets and their settings are affected.***
- ***Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.***
- ***Step 3: Assess the effects of the Proposed Development, whether beneficial or harmful, on that significance or on the ability to appreciate it.***
- ***Step 4: Explore ways to maximise enhancement and avoid or minimise harm.***
- ***Step 5: Make and document the decision and monitor outcomes."***

4.29 The guidance confirms at paragraph 9 that setting itself is not a heritage asset, nor a heritage designation; rather, its importance lies in what it contributes to the significance of the relevant heritage asset itself.

4.30 Importantly, the guidance highlights when views contribute the most to the significance of a place:

- ***"those where the composition within the view was a fundamental aspect of the design or function of the heritage asset.***

- ***those where town- or village-scape reveals views with unplanned or unintended beauty.***
- ***those with historical associations, including viewing points and the topography of battlefields.***
- ***those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected.***
- ***those where relationships between the asset and other heritage assets or natural features or phenomena such as solar or lunar events are particularly relevant."***

4.31 Of relevance to this proposal is the following commentary from the guidance:

- ***"Cumulative change – Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset.***
- ***Change over time – Settings of heritage assets change over time. Understanding this history of change will help to determine how further development within the asset's setting is likely to affect the contribution made by the setting to the significance of the heritage asset.***
- ***Setting and urban design – The numbers and proximity of heritage assets in urban areas mean that the protection and enhancement of setting is intimately linked to townscape and urban design considerations, including the degree of conscious design or fortuitous beauty and the consequent visual harmony or congruity of development, and often relate to townscape attributes such as lighting, trees and verges, or the treatments of boundaries or street surfaces."***

Statements of Heritage Significance: Analysing Significance in Heritage Assets (2019)

4.32 This Historic England advice note covers the National Planning Policy Framework requirement for applicants, where relevant, to describe heritage significance to help local planning authorities to make decisions on the impact of proposals for change to heritage assets.

4.33 The guidance suggests a staged approach to decision making in regard to heritage assets would usually embrace the following stages, informed by the scope of the proposal:

1. Understand the form, materials and history of the affected heritage asset(s), and/or the nature and extent of archaeological deposits.
2. Understand the significance of the asset(s).

   These two stages fulfil the requirement in paragraph 189 of the NPPF and are undertaken by the applicant.
3. Understand the impact of the proposal on that significance.

This stage fulfils the requirement in paragraph 190 of the NPPF and is undertaken by the LPA. However, the applicant needs to be aware of impacts so that the analysis of significance submitted to the LPA, under paragraph 189, is sufficient in its level of detail.

4. Avoid, minimise and mitigate negative impact, in a way that meets the objectives of the NPPF.
5. Look for opportunities to better reveal or enhance significance.

Development Plan Policy

The London Plan (Draft and Adopted)

4.34 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.

4.35 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 asset's 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."

Local (London Borough of Camden) Policies

4.36 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.

4.37 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."***

4.38 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. "***

4.39 LBC 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.

4.40 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.

4.41 The Bloomsbury Conservation Area Appraisal and Management Strategy (2011) states at Paragraph 5.32 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.

5 Assessment of Significance

5.1 This Section describes the significance of the heritage assets identified in Section 2. The assessment also identifies the contribution to the significance of the asset that the setting makes. This assessment is proportionate to both the significance of the relevant heritage assets, the nature of the proposed development and the likely magnitude and form of effect.

Bloomsbury Conservation Area

5.2 As discussed in Section 2, the impact of the proposed development is restricted to the following streets within the Bloomsbury Conservation Area:

- Main Quadrangle
- Gower Street

5.3 The Site is not located in the setting of any other streets within the Conservation Area, and therefore the impact of the proposals on their significance has not been assessed.

5.4 An assessment of the significance of the affected streets in terms of their historic, architectural and aesthetic value is set out below using Historic England's set of values to determine an asset's significance.

Main Quadrangle

Heritage Value	**Assessment of Heritage Value**
Historic	The Main Quadrangle is globally and nationally recognised as the main landmark of UCL Bloomsbury Campus. The Main Quadrangle along with the Wilkins Building was designed by architect William Wilkins, who also designed the National Gallery building in Trafalgar Square, both very similar and iconic examples of English architecture. The Wilkins Building and Main Quadrangle was constructed in a piecemeal manner, and was only completed in 1985. There was a formal opening ceremony hosted by Queen Elizabeth II of the United Kingdom. Today, the Main Quadrangle is recognised as both a thoroughfare for students and staff to get to and from buildings and a high quality public realm for leisurely purposes.
Architectural & Artistic	The Main Quadrangle is laid out as two lawns either side of a central path. It contains a number of mature trees. The Main Quadrangle accommodates two decommissioned astronomy observatories, themselves Grade II listed. The structure of the Wilkins Building and the Corinthian portico ranges around the Main Quadrangle, which is considered to be a magnificent piece of a neo-Grecian central block.

Table 2: Assessment of Heritage Value – Main Quadrangle

5.5 Overall, the Main Quadrangle is considered to be a heritage asset of very high historic and architectural interest.

Figure 15: UCL Main Quadrangle (source: ucl.ac.uk, accessed 02 April 2020)

Gower Street

Heritage Value	Assessment of Heritage Value
Historic	The university expanded from its original Site to go further southwards along Gower Street. As a result, Gower Street is now known as the primary street of the UCL Campus, and it contains a number of UCL owned and occupied buildings, including the University College London Hospital and the Cruciform Building. Notable residents of Gower Street have included the architect George Dance the Younger, painter William de Morgan and John Shaw, among many others. This is celebrated by English Heritage blue plaques fixed to relevant buildings along Gower Street.
Architectural & Artistic	Gower Street directly faces the Main Quadrangle and Wilkins Building main elevations. The buildings on the east side of Gower Street are mainly constructed with Stone, whereas buildings of brick and decorative terracotta construction together with some stone detailing can be found on the west side of Gower Street. Heights vary from Site to Site, but each block exhibits its own uniformity. The uniformity of design of the elevations on Gower Street was a result of the contractual controls over issues such as dimensions, materials and surfacing imposed by Bedford Estate. As a result, the buildings along Gower Street are recognised for their high architectural merit due to their quality design and positive contribution to the streetscape.

Table 3: Assessment of Heritage Value – Gower Street

5.6 Overall, Gower Street is considered to be a heritage asset of high historic and architectural interest.

Figure 16: Views down Gower Street (Source: Author's own)

Listed Buildings

Cruciform Building

Figure 17: Cruciform Building (source: Author's own)

Listing Description (extracted from the National Heritage List for England)

Grade II, listed 12 March 1974.

UNIVERSITY COLLEGE HOSPITAL GENERAL BLOCK ONLY AND ATTACHED RAILINGS, GOWER STREET

Hospital block. 1897-1906. By Alfred and Paul Waterhouse. Red brick with terracotta horizontal bands and dressings. Steeply pitched slated roofs with dormers. Cross-shaped plan set diagonally to Gower Street. EXTERIOR: 4 main storeys, attics and basements. Central entrance lodge; 3 bays, 2 storeys and attic with terracotta bands and rounded angles. Round-arched ground floor openings. Central entrance flanked by columns supporting an entablature with parapet and ball finials. Segmental arched 1st floor sashes separated by pilasters supporting a projecting dentil cornice and pediment over the central bays. Pediment flanked by full size sash window dormers in steep mansard roof. Main buildings with central staircase projection with 3 lancet windows and steep pointed roof behind which a bell tower with spire. To either side, tall chimney-stacks and pots. Diagonally from this feature, wings with projecting 2-window, pedimented bays. Main range of windows with enriched surrounds and pierced decorative grilles to aprons. Wings terminate with a bay of balconies to each floor and 3-window rectangular towers, with dormers corbelled at the angles, and surmounted by pointed roofs with rectangular, louvred features. Main cornice at attic level. INTERIOR: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with parapet wall behind area basement blocks. HISTORICAL NOTE: important as the first reaction against Florence Nightingale's long-pervasive pavilion planning, and the first importation of American ideas on 'towers of healing' for city Sites. (Survey of London: Vol. XXI, Tottenham Court Road and Neighbourhood, St Pancras III: London: -1949: 85-6).

Significance

Heritage Value	Assessment of Heritage Value
Historic	This asset has moderate to high historical value. The four-storey building was designed in 1896 by the renowned Victorian architect, Alfred Waterhouse, as a replacement building for the earlier University College Hospital on Gower Street. The building takes its name from its plan form and is a landmark building due to its prominent corner towers. It was originally built as a hospital and is notable important as the first reaction against Florence Nightingale's long-pervasive pavilion planning, and the first importation of American ideas on 'towers of healing' for city Sites.
Architectural & Artistic	This asset has moderate to high architectural value. It is constructed from red brick, and its architecture is expressed by a rusticated stone base. This asset remains notable for its cruciform plan, and a shift away from earlier hospital buildings of a 'pavilion' type. Its architectural style and form makes it stand out from other structures and buildings on the street.

Table 4: Assessment of Heritage Value – Cruciform Building

Figure 18: Views from the Cruciform to the Site (Source: Author's own). The building outlined in red is the Pearson Building blocking the view to the Site.

Contribution of Setting to Significance

5.7 Overall, the setting makes a moderate contribution to the significance of the heritage asset. It is located on Gower Street which is strongly associated with UCL, making it locally recognised as an important heritage and academic asset. Although its building form, size and gothic architectural style makes it visually stand out from the streetscape, it is located awkwardly amongst buildings' of other architectural styles. Therefore, its setting makes a minimal contribution to its significance.

Contribution of the Site to the Setting

5.8 Overall, the Cruciform Building makes a high contribution to the setting of the heritage asset as it sits directly opposite the Main Quadrangle and forms part of the main UCL Bloomsbury Campus. The Site contributes to the setting of the Cruciform Building by forming the core part of the Bloomsbury Campus. However, the Site does not have a visual relationship with the immediate setting of the Cruciform Building because of the Pearson Building blocking this view, as shown in Figure 16.

Kathleen Lonsdale Building

Figure 19: Kathleen Lonsdale Building (source: ucl.ac.uk, accessed 27 March 2020)

5.9 The building recently underwent a series of refurbishment works, including the introduction of secondary glazing, upgrading existing boilers and chillers and improvement of the legibility of internal spaces and functions. These interventions have led to a 23% reduction in overall carbon emissions[7]. Refurbishment works were completed in 2018.

[7] https://www.ucl.ac.uk/sustainable/sustainable-campus/sustainable-construction/kathleen-lonsdale-building-0

Listing Description (extracted from the National Heritage List for England)

Grade II, listed on 14 May 1974

UNIVERSITY COLLEGE CHEMISTRY LABORATORYAND ATTACHED RAILINGS AND WALL, GOWER PLACE

University chemistry laboratory. 1912-13. By FM Simpson. Stone facade with later slate mansard roof and dormers. 2 main storeys, attic and basement. Symmetrical facade in modified Neo-Greek style with projecting end and central bays; fenestration 2:8:3:8:3. Main pedimented entrance distyle-in-antis with columns (Tower of Winds capitals) rising through ground to 1st floor and supporting an entablature inscribed "ANNO DOMI MCMXIII UNIVERSITY OF LONDON UNIV COLL", beneath which paterae. Double flight of steps to architraved doorway with console brackets carrying pediment. Flanking bays with shallow pilasters, rising from rusticated basement podium, between window bays and carrying a simplified entablature. Recessed metal transom and mullion windows, the 1st floor with lugged aprons enriched with paterae. Parapet. INTERIOR: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings and stone wall to areas with candelabra of box form flanking entrance steps. The buildings around the quadrangle of University College form a group. (Survey of London: Vol. XXI, Tottenham Court Road and Neighbourhood, St Pancras III: London: -1949: 87-90).

Significance

Heritage Value	**Assessment of Heritage Value**
Historic	The asset is of moderate historic value. It was built in 1915 as the first purpose-built Chemistry building for UCL. This asset is the first UCL building to be named after a woman. Kathleen Lonsdale graduated from UCL with an MSc in 1924 and a Doctor of Science in 1936. She discovered the structure of benzene and hexachlorobenzene. In 1949, she was appointment the professor of Chemistry at UCL and was the first tenured woman professor at that college.
Architectural & Artistic	The asset is of moderate architectural value. The building façade is entirely made of Portland Stone, and along with the crisp neo-Georgian style presents a strong façade to the street, making a contribution to the setting of adjacent assets and the Conservation Area.

Table 5: Assessment of Heritage Value – Kathleen Lonsdale Building

Contribution of Setting to Significance

5.10 The setting of the building in UCL's Bloomsbury Campus contributes highly to the building's significance. However, Gower Place, the street on which the asset is visually appreciated the most, makes a minimal contribution to significance, because it is a small street located on the edge of the Bloomsbury Campus.

Contribution of the Site to the Setting

5.11 The rear service yard area of the KLB is enclosed by the Site to the south. The Site makes a high contribution to the building's setting and serves as a reminder of the adjacency and close-knit built fabric of academic buildings on the Bloomsbury Campus.

23 Gower Place

Figure 20: 23 Gower Place (source: Author's own)

Listing Description (extracted from the National Heritage List for England)

Grade II, listed on 14 May 1974

23, GOWER PLACE

Warehouse and shop with flats over. Late C19. Red brick with terracotta dressings. Slated mansard roof with central gabled dormer flanked by stone dressed gables. Shop front with stone Jacobean pilasters carrying entablature. C20 goods entrance to left with panelled head. Sill string at 1st floor level. Architraved, pedimented windows with continuous frieze band enriched with swags. Lombard frieze at cornice level above which an undulating parapet with rectangular terracotta panels and ball finials. Central gabled dormer with cornice (frieze enriched) broken forward at angles with ball finials and surmounted by a pediment.

INTERIOR: not inspected.

Significance

Heritage Value	Assessment of Heritage Value
Historic	This asset has moderate historical value. It is a two-storey building, and was a late 19th Century shop and warehouse building. It is unusual in that it is not a building directly associated with UCL and represents a period when the area was mainly residential, before the dominant growth of the university.
Architectural & Artistic	This asset has moderate architectural interest, constructed from decorative red brick and terracotta frontage. The ground floor incorporates a shopfront and archway containing full-height, vertically-boarded timber gates. For an asset of this size it is highly decorative and stands in contrast to its immediate neighbours being in red brick.

Table 6: Assessment of Heritage Value – 23 Gower Street

Contribution of Setting to Significance

5.12 The Site is located within the Bloomsbury Campus, and this contributes most to its significance. It is dwarfed by neighboring (university) buildings and so its physical relationship with the streetscape and surrounding buildings does not contribute positively to its setting.

Contribution of the Site to the Setting

5.13 The Slade contributes to the setting of 23 Gower Place by way of being co-located on, and forming part of, the UCL Bloomsbury Campus. The Site physically encloses the building to the rear. The Site makes a moderate contribution to the setting of the building.

Two Observatories in the Main Quadrangle

Listing Description (extracted from the National Heritage List for England)

Grade II, listed on 28 March 1969

TWO OBSERVATORIES IN UNIVERSITY COLLEGE QUADRANGLE, GOWER STREET

2 observatories. c.1804-6. Vermiculated stone with domed lead roofs. Ashlar dressings. Octagonal plan. Barred windows and wooden 2-panel doors. Projecting moulded stone cornices. INTERIORS: not inspected. The buildings around the quadrangle of University College form a group.

Figure 21: One of the observatories sitting in the Main Quadrangle, directly to the front of the Site (source: ucl.ac.uk, accessed 03 April 2020)

Significance

Heritage Value	**Assessment of Heritage Value**
Historic	High historic value. Astronomy was originally taught on the main UCL Site, using equipment like the two domes in the front quad (built in 1905-1907). Other similar domes were destroyed during World War II and there are limited remaining examples. Scientific research into fields such as Astronomy has been a strong feature of UCL since its inception in 1826. Today, the Department of Physics and Astronomy is one of the top rated Departments nationally and globally. At a time when astronomy was a popular hobby amongst the elite, including gentlemen architects and it was not uncommon to build grand 'follys' or monuments to house observatories, giving them a particular status and elevating astronomy as a pastime. The Monument to the Great Fire of London by Robert Hooke and Christopher Wren being a notable example where an observatory was included.
Architectural & Artistic	Moderate to low architectural value. The octagonal observatories are a unique structure to be found in Central London and are in a simple neo-classical style.

Table 7: Assessment of Heritage Value – Two Observatories in the Main Quadrangle

Contribution of Setting to Significance

5.14 The setting makes a high contribution to the significance of the asset. The observatories are located within the core of the UCL Bloomsbury campus, making them very visible to the public. They are surrounded by assets of very high architectural merit, like the Wilkins Building and the Portico, and are set amongst a number of mature trees. They are intended to be seen and in some regards, celebrate their purpose.

Contribution of the Site to the Setting

5.15 The observatories are located in very close proximity to the Site. The Site makes a very high contribution to the setting of the observatories as it forms part of the Quadrangle and the centerpiece of the UCL Bloomsbury Campus.

The Site (comprising the North Wing of the Wilkins Building)

Listing Description (extracted from the National Heritage List for England)

Grade I, listed on 10 June 1954

University College (University of London) and attached railings to north and south wings, Gower Street

CAMDEN GOWER STREET (West side) University College (University of London) and attached railings to north and south wings 10/06/54

GV I College. Central block c1827-29 by W Wilkins and J.P Gandy-Deering. Flaxman Gallery and Library c1848 by T.L Donaldson. South wing, c1869-76, north wing c1870-1881, both by T. Hayter Lewis. North-west wing 1912-13 by F.M Simpson. South-west wing, c1923 by A.E Richardson. South Junction block 1950, North Junction block 1951, Physics Building 1950-52 by A.E Richardson and E.A.S Houfe. STYLE/PLAN: stone buildings in Neo-Grecian style enclosing a quadrangle, the Flaxman Gallery and library extending from the rear of the portico.

EXTERIOR: main facade and wings, two storeys and attic. Central block: decastyle Corinthian pedimented portico on high podium approached by Imperial steps with solid stone balustrade and piers. Behind the pediment, the enriched copper dome, with blind stone lantern, of the Flaxman Gallery. Flanking the portico, 22 bays with rusticated ground floor and pilasters rising from the first floor and carrying an entablature. Architraved sash windows with cornices. Attic with rectangular, small paned windows in groups of three. Flaxman Gallery and Library: space below the dome remodelled by Donaldson to house the plaster originals of Flaxman's sculptures.

Library block of three storeys in brick with a stone arcade of paired columns at ground floor level. Stone band at first floor level. Large arcaded windows with stone impost bands. Second floor stepped back, a partly blind arcade only the arched heads being glazed. Enriched stone roundels in the spandrels. Stone capped parapet.

North and south wings: two storeys with 13 bays each of which the centre bays form projecting semi-rotundas with Corinthian columns rising from the first floor carrying entablature and parapet. One bay either side of these features also projecting. First floor with pilasters between architraved sash windows with console bracketed cornices and sill string. Ground floor rusticated with architraved sashes with cornices. Architraved entrances, in the centre of projecting semi-rotundas, with console bracketed cornices, fanlights and panelled doors. Enriched frieze at first floor level.

North-west and south-west wings: 11 bays each in similar style but without rotundas. End bays projecting at entrance to quadrangle with three window returns. Similar facades to Gower Street.

INTERIORS: all retain original features.

SUBSIDIARY FEATURES: attached cast-iron railings and stone piers to basement areas of wings.

HISTORICAL NOTE: founded to provide university education without religious bias and the first college of London University. Housed in a cupboard in the College is the dressed skeleton of Jeremy Bentham, philosopher and reformer who bequeathed himself on his death in 1832. Also housed at the college, a collection of neo-Classical sculpture by Flaxman and a collection of pictures.

Significance

5.16 'Significance of Element' extracted from the Conservation Management Plan produced by Mark Hines can be found in Appendix 1. This assesses different elements of the Site according to their significance.

Heritage Value	Assessment of Heritage Value
Historical	• Symbolizes early historical development of UCL, constructed by the lawyer and philanthropist, Felix Slade in 1868; • A large number of famous artists and notable alumni figures have studied there, including but not limited to, Augustus John, William Orpen and Percy Wyndham Lewis; • Continuously ranked as UK's top Art and Design institution; • Building's historical connections with science and art; and • An important example of an early purpose-built art school.
Architectural and artistic	• The external appearance of the building and its role in the group value of buildings in the front quadrangle; • Internal alterations and floor plan represents changing views on art production and teaching; • The survival of the sensitive Portland Stone exterior facade; • Its contribution to the wider setting of the main quadrangle of UCL and Bloomsbury conservation area; and • Form and construction of the original roof structure from 1881.

Table 8: Assessment of Heritage Value – The Site

Contribution of the Setting to Significance

5.17 The setting makes a very high contribution to the significance of the Site, as it is located, and indeed forms a part of, the heart of the UCL Campus and the Main Quadrangle.

Summary of Significance

5.18 The special interest of the asset lies in its group value and historical significance. It was one of the first buildings constructed as part of the UCL Campus, by Felix Slade in 1868. Since then, a long list of notable artists and designers have studied at the Slade, making it the number one school to study art and design in the UK and is globally recognised as a prestigious institution.

5.19 The Slade (North Wing of the Wilkins Building) forms part of the Wilkins Building.. Together, the setting of the Wilkins Building forms an enclosed space to create a focal public realm. The asset also has a very high architectural value and significance, being a vital component of the wider UCL estate and Bloomsbury Conservation Area.

7 Assessment of Impact

Wilkins Building

7.1 The impact on the significance of the Wilkins Building and other identified heritage assets is appraised using an assessment methodology derived from the relevant policy and guidance. In particular, the following documents have been utilised in this appraisal:

- National Planning Policy Framework (NPPF) (2012)
- National Planning Practice Guidance
- Historic Environment Good Practice Advice in Planning: Managing Significance in Decision-Taking in the Historic Environment, Historic England (2015)

7.2 The following table sets out an assessment of the impact of each of the proposed works on the significance and special interest of the building.

Proposed Work	Significance of Element Affected by Work	Impact of Work	Commentary
Replacement of roof lights to roofs 4-7 with new double glazed units.	Medium - Roof 5 is the most significant as identified in the Conservation Management Plan ('CMP') prepared by Mark Hines.	Low negative.	The works relate specifically to the roof lights and not the roofs in their entirety. The existing roof lights are in their original form, however are in a poor condition, with signs of water ingress. As identified in Appendix 1, the roof lights are considered to be of moderate significance. The installation of double glazed units will result in significant energy and thermal savings therefore improving in thermal U-value improvements. The replacement roof lights will not be visible from ground level. The overall architectural and historical significance of the asset will not be impacted.
Draught proofing to windows at the front of the building.	High.	No impact.	As advised by Historic England[8], draught proofing to windows is one of the least intrusive methods of improving the comfort of occupants and reducing energy used for heating with little or no change to a buildings appearance.
Renovation works to windows across the building to repair building fabric and	High.	Neutral.	Renovation works will avoid replacing original fabric of the building. This intervention will play a crucial role in improving the sustainability standards of the building. Renovation works will involve like-for-like repairs.

[8] https://historicengland.org.uk/images-books/publications/eehb-draught-proofing-windows-doors/heag084-draughtproofing/

joinery where required;			
Replacing the second floor single glazed clerestory windows with new single glazed units.	Medium.	Low negative.	The windows will be replaced on a like-for-like basis. Due to their age, the clerestory windows are in a poor state with signs of water ingress and damp. The replacement of the windows will be done on a like for like basis and will not impact the overall significance of the building.
Repairing existing slate and asphalt roofs 9-13 and copper roof 17	Low-Medium.	Neutral.	The rear roofs are considered to be of a lower significance and are hidden from view from the public realm. The repair works to the slate, asphalt and copper roofs will not impact on the Site's visual appearance or significance.
Erection of temporary scaffolding	High.	Low negative.	Although there will be a temporary negative impact to the visual appearance, the works will enable the preservation of the asset in the long term by allowing vital repairs to be carried out. Tying in points will be limited in number and located in hidden locations. The repairs will not be discernible and will be carried out using best conservation practice methodology. A detailed method for the repair of intrusions can be found within the Schedule of Works, submitted with this application.
Light clean to the front elevation	High.	Minor positive.	The clean will enhance the special architectural interest of the building's exterior, as well as enhancing the building's contribution to the character and appearance of the Conservation Area.

Table 9: Assessment of Impact of Proposed Works on the Wilkins Building

7.3 The proposals offer considerable opportunities to maintain the special interest of the building by carrying out maintenance and repair works that will ensure its viable long term use. The proposals will also make the building a more sustainable asset through minor interventions and will result in considerable reduction in thermal and energy loss of 11.8%, which is further discussed in the supporting Sustainability Statement produced by Burohappold. The Statement also discusses thermal u-value improvements, and how this allows the building to meet modern day sustainability requirements.

7.4 The light clean works to the elevations will improve the building's visual appearance and architectural significance, therefore making a positive contribution to the significance of the wider Wilkins Building and setting of the Main Quadrangle. The replacement of clerestory windows and roof lights will have a low negative impact in terms of loss of original fabric, however, in the long term the works will have a positive impact on the building overall as they will help ensure it continues in long term viable use. Removal of original fabric will be kept to a minimum.

7.5 Overall, on balance, the **proposals will have a minor positive impact on the significance of the asset.**

Adjacent Listed Buildings (Cruciform Building, Kathleen Lonsdale Building, 23 Gower Place and the Two Observatories)

7.6 As stated within Section 3 of this report, the proposed development is primarily focused on repair and maintenance works to the roofs, roof lights, clerestory windows and asphalt roofs, along with light touch cleaning works carried out to the front elevation. Therefore, the works will not result in changes to the building's height, volume, front or rear façade.

7.7 The proposed works are considered to result in minor temporary harm to the Kathleen Lonsdale Building and 23 Gower Street while the temporary scaffolding is in situ, as it would have a temporary impact on their setting. However, this harm will only last for a short period of time and will not have any physical impact on the heritage assets while the scaffolding is erected. Once the works are complete, the works will make a positive contribution to the setting of these assets.

7.8 The erection of scaffolding will have no impact (temporary or permanent) on the Cruciform Building due to limited visibility from the Site.

7.9 Once the proposed works are completed, the Site will have a neutral to positive impact on the assessed heritage assets due to the improved condition of the roofs, windows and front elevation.

Overall, the level of harm is considered to be neutral, with a positive impact on the setting and therefore significance of the adjacent heritage assets in the long term, balanced out by the temporary harm to setting and significance during the construction period.

Conservation Area

7.10 The Bloomsbury Conservation Area, is a heritage asset of high significance. However, the Conservation Area spans over 60 hectares, therefore, this report only assesses the impact on the Conservation Area on a street-by-street basis, which included the Main Quadrangle and Gower Street.

7.11 Overall, the elements assessed of the Bloomsbury Conservation Area that have the potential to be impacted by the proposals are of high significance.

7.12 Following the completion of the works, the proposed development will enhance the character and appearance of the Conservation Area character area and identified streets. Similar to the impact on the assessed listed buildings, the scaffolding will cause some temporary harm to the conservation area.

Summary

7.13 The significance of the relevant designated heritage assets has been assessed and the contribution the setting makes to this significance.

7.14 The Site, itself Grade I listed, is located in Sub-Area 3 of the Bloomsbury Conservation Area, and surrounded by over 50 listed buildings located within the wider Bloomsbury Campus. Of these, four have a visual relationship or partial visual relationship with the Site. The remainder of these assets have been scoped out of further assessment following a Site visit.

7.15 The proposals involve the repair and maintenance works to the windows, roofs and roof lights of the Site, including light touch cleaning and repairs to the front elevation, therefore requiring the erection of temporary scaffolding for a short period of time. The proposals will improve the building's thermal performance and u-values to meet modern day sustainability requirements. Overall, on balance, the **proposals will have a minor positive impact on the significance of the Wilkins Building.**

7.16 The proposed development will enhance the main public realm surrounding the Site, the Main Quadrangle, due to the improved front elevation and repair of aged windows and roof lights. Overall, the **proposals will enhance character and appearance of the Conservation Area and will have an overall minor positive impact on the setting and therefore the significance of the identified listed buildings.**

8 Planning Policy Assessment

Introduction

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

- Heritage and Design; and,
- Sustainability.

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

Applicant's Response and Policy Assessment

Heritage and Design

8.3 Section 4 of this report lists the relevant NPPF policies, particularly the 'test' where harm should be weighed against the public benefits of the proposals (paragraph 196).

8.4 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.

8.5 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.

8.6 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.

8.7 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.

8.8 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.

Applicant's Response

8.9 As discussed and concluded within the impact assessment table (table 11 of this report), the proposals will have a minor positive impact on the significance of the Wilkins Building. They will enhance character and appearance of the Conservation Area and will have an overall minor positive impact on the setting and therefore the significance of the identified listed buildings.

8.10 There is some minor perceived harm on a temporary basis and to individual elements of the Wilkins Building. This harm is outweighed by the overall impact of the works, and also public benefits, which are outlined in full later in this Section.

Sustainability

8.11 At the heart of the NPPF is the presumption in favour of sustainable development.

8.12 London Plan Policy 5.2 'Minimising Carbon Dioxide Emissions' seeks to ensure that non-domestic buildings major developments meet a zero carbon target.

8.13 London Plan Policy 5.3 'Sustainable Design and Construction' outlines the need for development proposals to demonstrate sustainable design standards are integral to the proposal, including its construction and operation. They should also ensure that these issues are considered at the beginning of the design process.

8.14 Camden Local Plan Policy CC1 'Climate Change Mitigation' requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.

8.15 Camden Local Plan Policy CC2 'Adapting to Climate Change' requires all development to be resilient to climate change. The Council will promote and measure sustainable design and construction by ensuring non-domestic developments achieve a BREEAM rating of 'excellent'. The Policy also encourages expecting non-domestic developments of 500 sqm of floorspace or above to achieve "excellent" in BREEAM assessments and encouraging zero carbon in new development from 2019.

8.16 Camden's Sustainability CPG recognizes that energy efficiency measures for existing buildings will be bespoke to the building and that sensitive improvements can be made to historic buildings.

Applicant's Response

8.17 The existing building is in need of refurbishment. The traditional construction of the building means there is currently no wall, floor or roof insulation and the overall energy demand is high. The proposals will reduce the Slade's carbon emissions by improving the buildings airtightness and insulating levels. The energy saving measures are not considered to put the visual appearance or significance of the historic building fabric at risk or harm. The proposals aim to become a precedent in retrofitting historic buildings for modern day sustainability standards on the UCL Bloomsbury Campus.

8.18 UCL acknowledges that in order to improve its Energy Performance Certificate (EPC) rating and thermal performance across campus, it will need to intervene with its existing estate rather than merely focusing on new buildings. Therefore, the proposed works will improve the resilience of the building, in particular the roofs against the effects of climate change, enhance the thermal performance of the building and improve the future maintenance of the building.

8.19 As advised by Historic England's publication *Energy Efficiency and Historic Fabric*, secondary glazing is one of the best ways of improving comfort and reducing energy use, with little or no change to a building's appearance at minimal cost. This will reduce heat losses from any gaps around the windows. As a result, double glazing the roof lights in roofs 4-7 as shown in Figure 12 will provide significant benefits relating to comfort and energy efficiency for the Site's occupants.

8.20 The works to insulate the existing roofs and roof lights will increase the resilience of the building to extreme weather events and subsequent damage caused by water ingress. Chosen insulation materials for replacements are 'heritage approved' solutions.

8.21 In addition, the importance of improving the thermal performance of existing buildings is recognised on a national, regional and local scale.

8.22 As demonstrated throughout this statement, the proposals are fully in accordance with national and local planning policy.

8.23 The benefits to the thermal performance and energy efficiency of the building are also a considerable public benefit.

Summary of Public Benefits

8.24 The proposed works will result in isolated elements of **less than substantial harm** to the special interest of the Wilkins Building and some temporary less than substantial harm to adjacent listed buildings. **Overall, the proposals will result in a minor positive impact to the building.**

8.25 The isolated elements of less than substantial harm would be outweighed by the public benefits this scheme would deliver, therefore adhering to the test under the NPPF paragraph 196. These benefits are summarised below.

- The proposals provide the opportunity **to better reveal the special interest** of the building.
- Historic and original features will be **retained and restored** where possible.
- Thermal **U-value improvements**.
- Build on the **international reputation of the Slade** through supporting its **ongoing viable operation in its original home since** the 19th century.
- **Preserve and enhance the character of the building** by emphasizing its **historic connections to science and art**, and long established commitment to artistic quality and craftsmanship.
- **11.8% reduction in space heating energy usage** as explained in the accompanying Sustainability Statement.
- **Improved comfort and environment for occupants**, staff and students.
- **Retrofitting the historic fabric sensitively to modern day sustainability standards.**
- Setting a **precedent for retrofitting historic buildings within the UCL estate** with modern day sustainability standards.
- **Repairing degraded historic fabric** to minimise any loss of historic fabric in the future.
- The proposals will contribute to the **maintenance of the heritage asset**, ensuring its **longevity** and **enhancing its contribution to the Conservation Area**.

9 Summary & Conclusion

9.1 In accordance with the requirements of the NPPF, the significance of the designated heritage assets which have the potential to be affected by the application proposals, as well as the Site itself, have been described within this Heritage Statement. This includes an assessment of the contribution the setting and the Site makes to this significance. The impact on this significance has been assessed.

9.2 Overall, the proposals will have **a minor positive impact on the significance of the Wilkins Building**. The proposals will enhance character and appearance of the Conservation Area and will have an overall minor positive impact on the setting and therefore the significance of the identified listed buildings.

9.3 There is some minor 'less than substantial' perceived harm on a temporary basis and to individual elements of the Wilkins Building. As set out in NPPF paragraph 196, this harm should be weighed against the public benefits of the proposal. The public benefits have been set out in Section 8 of this Statement and is concluded that they outweigh the temporary and isolated instances of 'less than substantial harm' identified.

10 Appendix 1 – Significance by Element

Element	Significance
External walls, windows, doors and building form	A
Lower Life Room	A
Entrance hallway, staircase and circulation corridors to ground and first floor, stair columns and decoration	A
Masonry internal walls (c.1871-1914) (including remaining studios, Ramsay's ground floor office and lower ground floor laboratories)	B
Ceilings (including all jack arch ceilings)	B
Floors (existing paint finishes detract)	C
Iron and stone columns, structure and frame	B
Secondary staircases and lobbies	C
Roof structure (Second floor Apse Room only)	B
Building services (<1914)	C
Internal joinery, panelled doors, moulded skirtings and architraves	C
Paint finishes (walls, ceilings, joinery)	C
Lead roofs	C
Rooflights	C
Roof structure (General)	C
Lower ground floor sculpture gallery extension	C
Internal walls (1914> primarily second floor rooms)	E
Linings (wall, ceiling)	E
Mezzanine floors and associated stairs (1994)	E
Building services (>1914)	E

Significance	Grading
Very High Significance (A)	Elements of exceptional interest that are outstanding examples of their kind, which make a fundamental contribution to significance
High Significance (B)	Elements of considerable interest that are excellent or rare examples of their kind, which contribute strongly to significance
Significant (C)	Elements of intrinsic interest that are good and representative of their kind, which make a contribution to significance
Some significance (D)	Elements of interest that are typical or representative examples of their kind, which make some contribution to significance
No significance (E)	Elements that have no significance in conservation terms, may be visually intrusive, do not contribute or detract from significance

Figure 22: Significance of Element (Extracted from the Conservation Management Plan by Mark Hines, pg. 69)

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Real Estate

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