



# **Planning Statement**

39-47 Gordon sq. Birkbeck, University of London







Document Title
Planning Statement
BRK-AHR-GS-XX-RP-A-A3-007

for

Birkbeck, University of London

Ву

**AHR Architects** 

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### 1 Introduction

This planning statement has been prepared in support of a planning and listed building consent application for the refurbishment and renovation of 39-47 Gordon Square ("the site"). The applicant Birkbeck, University of London is seeking planning and listed building consent for: "Renovation, refurbishment and extension of 39-47 Gordon sq"

The project will provide a rationalisation of the School of Arts accommodation to enable the co-location of the School of Law, a comprehensive repair and renovation of the properties is envisaged. In addition, the building also currently suffers from poor way-finding, challenges to accessibility and outdated mechanical and electrical installations. The project will improve these aspects providing a much-needed investment in the modernisation of teaching facilities with improved welfare facilities for staff and students whilst respecting the historical significance of the Grade II listed fabric.

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

# 1.1 The applicant

Birkbeck is a world-class research and teaching institution, a vibrant centre of academic excellence for nearly 14,000 students and London's only specialist provider of evening higher education – which means students can balance studying with work, family and other commitments.

Founded in 1823, it joined the University of London in 1920. Because Birkbeck lectures are in the evening, many students work, intern or volunteer during the day, making them better placed to get ahead in a competitive job market. Birkbeck also offers exceptional career development through its alumni mentoring scheme and its in-house recruitment service. Birkbeck students are highly valued by employers for their maturity, independent-mindedness, focus and determination, which is why 95% of Birkbeck's students are in work or further study six months after graduating.

## 1.2 Application Documents

This application comprises of:

- Application forms, certificates and notices
- Planning Statement
- CIL Form
- Design and Access Statement
- Travel and Transport Statement
- Acoustic Survey Technical Note
- Ecology report
- Site location plan
- Architectural Drawings (including existing, demolition and proposed plans, sections, roof plans and external and internal elevations)
- Heritage Statement
- Structural Proposals Drawings
- Schedule of Works

# 1.3 Structure of Planning Statement

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. This statement comprises the following sections:

- 2: Site Context
- 3: Project Justification
- 4: Overview of the Proposals
- 5: Pre-application Consultation
- 6: The Development Plan and Policy Designations
- 7: Summary of the Benefits of the Proposal

### 2 Site Context

### 2.1 Site Location

The site is located within No.s 39-47 Gordon Square, nine Georgian town houses on the eastern side of Gordon square in Bloomsbury, in the London Borough of Camden ('LBC'). It is in close proximity to the wider university of London campus.

# 2.2 Surrounding Area

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

# 2.3 Site Description

Nos. 39–47 are Grade II listed, formed by nine, internally-connected mid-terrace houses. Eight of these former houses (Nos.39–46) were built in 1825 with the southern house (No.47), forming part of an adjoining terrace built later in 1857. Both parts of the terrace were constructed to designs by the renowned builder-architect Thomas Cubitt and typify the celebrated Bloomsbury townscape of refined terraces set about garden squares. The terrace has additional historic interest having an association with the Bloomsbury Group, a group of avant-garde, early-twentieth century intellectuals who first gathered in salons in No. 46 Gordon Square and No.46 was the residence of John Maynard Keynes, economist (GLC plaque).

The entire terrace is Grade II listed, with two separate listings for the earlier and later parts (please see The Heritage Statement for the Listing Descriptions). The Site is located within Sub-Area 2 of LB Camden's Bloomsbury Conservation Area. The sub-area covers Gordon Square, Woburn Square and Byng Place, and is densely packed with nationally listed buildings and structures. The terrace to the rear of the Site (east), Nos. 29 – 45 Tavistock Square, is also Grade II listed was also designed by Thomas Cubitt and is of similar appearance but sits outside Sub-area 2.

39-47 Gordon Square form part of a series of late Georgian terraced houses constructed from London stock brick with stucco architectural dressings to the front and a brick rear elevation. The front of the buildings have generally retained their appearance, scale and

massing and their relationship with Gordon Square. The rear elevation of the terrace underwent significant change in the twentieth-century. The rear elevation of No. 43 was likely rebuilt in the post-war period with much of the rear elevation now dominated by the rear extension and cooling tower from the 1960-70s.

Internally, the individual buildings have been modified to varying degrees with few retaining clearly legible original floor plans. The significance of spaces within the original buildings varies, depending on the survival of original fabric and detailing. The rear of the buildings have undergone change, parts of the Late twentieth-century and twenty-first century fabric is of high-quality and striking in architectural design.

The properties are set over 6 storeys, including a basement level, and the top (fourth) floor within a mansard roof set behind a brick parapet. To the rear of the properties are later extensions over 2 storeys. The buildings are in D1 use by the Birkbeck University of London.

# 2.4 Planning History

Planning History is summarised below.

2018/1605/L	39-47 Birbeck College Gordon Square London WC1H 0PD	Proposed installation of an external front signage at entrance to house number 43 Gordon Square, to aide wayfinding for students and visitors to the College's premises at Gordon Square.	REGISTERED	11-05-2018
2012/3440/L	Birkbeck College 42-44 Gordon Square London WC1H 0PD	External alterations including the replacement of two existing timber casement windows with a single metal framed sliding window at ground floor level at rear elevation (Class D1).	FINAL DECISION	09-07-2012
2012/3406/P	Birkbeck College 42-44 Gordon Square London WC1H 0PD	The replacement of two existing timber casement windows with a single metal framed sliding window at ground floor level at rear elevation (Class D1).	FINAL DECISION	09-07-2012
2012/2594/L	School of Arts 42 - 44 Gordon Square London WC1H 0PD	Internal refurbishment works to include alterations to partitions, alterations to existing window openings, installation of glazed screen at reception area, panelling and architraves to existing sash windows, removal of staircase between basement and first floor, and installation of joinery at rear and side wall of reception.	FINAL DECISION	23-05-2012
2009/4520/L	39-47 Gordon Square London WC1H 0PD	Internal alterations including blocking a door at first floor level, removing existing internal lobby at second floor level and associated structural remedial works to internal partitions of the non-residential university building (Class D1).	FINAL DECISION	19-10-2009

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2009/2277/L	University College London 39-47 Gordon Square, London, WC1H 0PD	Alterations at roof level to rear of existing school (Class D1).	FINAL DECISION	07-08-2009
2009/0660/L	39-47 Gordon Square London WC1H 0PD	Internal alterations including installation of three boilers and associated pipework at basement level.	FINAL DECISION	06-04-2009
2008/5112/L	43 Gordon Square London WC1H 0PD	Alterations associated with display of 400mm x 400mm wall mounted brushed stainless steel tray sign.	FINAL DECISION	13-01-2009
2007/1636/L	39-47 Gordon Square London WC1H 0PD	Alterations to internal doors to improve accessibility and the refurbishment of circulation space.		12-04-2007
2007/0072/A	Birkbeck College, 39-41 Gordon Square, (Malet Street and Torrington Square entrances) London WC1H 0PD	Display of externally illuminated projecting sign at ground floor level next to Malet Street entrance, halo lit letters sign at first floor level on flank wall of Torrington Square entrance, 2 non-illuminated banner signs at ground floor level either side of Torrington Square entrance, and halo lit letters at first to second floor level on South elevation of the building.	APPEAL DECIDED	10-01-2007
2006/0348/L	Birkbeck College 39-41 Gordon Square London WC1H 0PD	Submission of details of new/altered openings (condition 3a), and method of protection, repair and reinstatement of cornice in No. 40 (condition 3b) pursuant to listed building consent dated 6th July 2005 (ref. 2005/0675/L) for internal and external alterations at ground and basement floor levels.	FINAL DECISION	23-01-2006
2005/1958/L	UCL History of Art Department 39 - 41 Gordon Square London WC1H 0PD	New doorway openings from the front Listed Building to the existing rear extension, external alterations to rear extension, and insertion of rooflight to flat roof of rear extension at no. 40.	FINAL DECISION	14-06-2005
2005/0675/L	Birkbeck College 39 - 41 Gordon Square London WC1H 0PD	Internal and external alterations to basement and ground floor of educational building (Class D1) including new windows and service openings at rear.		31-05-2005
2005/0673/P	Birkbeck College 39 - 41 Gordon Square London WC1H 0PD	Alterations to the rear elevation at ground and basement levels of education building (Class D1) including new windows and service openings.	FINAL DECISION	31-05-2005
PSX0205278	39-47 Gordon Square LONDON WC1H 0P	Installation of disabled access to No.42 Gordon Square, as shown by drawing number 01295 C39B, C60A, C63A & C68.	FINAL DECISION	14-11-2002

LSX0205279	39-47 Gordon Square LONDON WC1H 0P	Installation of disabled access to No.42 Gordon Square, as shown by drawing numbers 01295 C39B, C60A, C63A & C68.	FINAL DECISION	14-11-2002
PSX0105470	39-47 GORDON SQUARE LONDON WC1H0PD	Internal and external alterations including the installation of a replacement lift and plant at basement level and rear ground floor roof, as shown on drawing numbers; 01295P/01; 02; 03 rev.3; 04 rev.4; 05 rev.2; 06 rev.2; 07 rev.2; 08 rev.2; 09 rev.3; 10 rev.3; 12 rev.1; 13 rev.1; 14 rev.1; 15 rev.1; 16 rev.1; 17 rev.1; 18 rev.1; 19 rev.1; 20 rev.1; 21 rev.1; 22 rev.1; 100 rev.1; general specification of works; specifications and details of proposed plant.	FINAL DECISION	07-05-2002
LSX0105471	39-47 GORDON SQUARE LONDON WC1H0PD	Internal and external alterations including the installation of a replacement lift and plant at basement level and rear ground floor roof, as shown on drawing numbers; 01295P/01; 02; 03 rev.3; 04 rev.4; 05 rev.2; 06 rev.2; 07 rev.2; 08 rev.2; 09 rev.3; 10 rev.3; 12 rev.1; 13 rev.1; 14 rev.1; 15 rev.1; 16 rev.1; 17 rev.1; 18 rev.1; 19 rev.1; 20 rev.1; 21 rev.1; 22 rev.1; 100 rev.1; general specification of works; specifications and details of proposed plant.	FINAL DECISION	07-05-2002
PSX0104267	39-47 GORDON SQUARE LONDON WC1H0PD	Insertion of new windows, link corridor at rear of building and air intake units on flat roof, as shown on drawing numbers: - 003-8, 04-9, 005-8, 008-9, 009-1, 013-8, 014-8, 015-8, 018-8, and rear photo and details air intake units.	FINAL DECISION	28-06-2001
LSX0104268	39-47 GORDON SQUARE LONDON WC1H0PD	Refurbishment of ground floor and basement areas including stairs, offices, new windows, and link corridor at rear of building, and air intake units on flat roof, as shown on drawing numbers: - 003-8, 04-9, 005-8, 008-9, 009-1, 013-8, 014-8, 015-8, 018-8, and rear photo and details air intake units.	FINAL DECISION	28-06-2001
9570252	44 Gordon Square WC1	Internal alterations at second floor level comprising the formation of new WCs and a butler's pantry. as shown on drawing numbers BC/GS/10B and /11.	FINAL DECISION	14-08-1995
8970119	43 Gordon Square WC1	Retention of satellite television receiving ariel dish on rear extension.	FINAL DECISION	15-06-1989

8900261	43 Gordon Square WC1	Retention of satellite television receiving ariel or rear extension.	FINAL DECISION	02-06-1989
8900217	42-45 Gordon Square WC1	Insertion of 7 new windows in rear wall of rear extension as shown on drawing numbers 917/S2A S5 P1E P2C & P3C and unnumbered site plan.	FINAL DECISION	08-05-1989
8770268	43 Gordon Square WC1	Erection of a satellite television receiving aerial dish of diameter 1.2m on the roof as shown on 2 x A4 size sheet numbers 13212/1 & 7 Civil Engineers Specifications and 2 X unnumbered photographs revised by letter dated24th September 1987.	FINAL DECISION	08-06-1987
8701929	43 Gordon Square WC1	Erection of a satellite television receiving aerial dish of diameter 1.2m on the roof as shown on 2 x A4 size sheet numbers 13212/1 & 7 Civil Engineers Specifications and 2 x unnumbered photographs revised by letter dated 24th September 1987.	FINAL DECISION	08-06-1987
HB3205	42-47 Gordon Square, WC1	Internal alterations to provide new fire lobbies in order to comply with fire regulations.	FINAL DECISION	18-05-1983
HB2130	47 Gordon Square WC1	Formation of a new internal doorway in the party wall on the ground floor.	FINAL DECISION	14-02-1979
HB1890	42-47 Gordon Square, WCI	Removal and erection of partitions and alterations to partitions at basement, 1st and 2nd floor levels.	FINAL DECISION	23-03-1978
HB1730	42-47 Gordon Square, WC1	The removal of modern internal partitions at third floor level and the formation of new door openings including the linking of Nos. 42-43 at fourth floor level and the installation of a double glazed window.	FINAL DECISION	05-08-1977

# 3 Project Justification

The following statement has been provided by Birkbeck, University of London:

Birkbeck is a 200 year old, traditional research active university and as such operates on a model which values the creation and provision of space to think as one of its highest priorities. In order to attract and retain the top academic talent in the world there are levels of expectation that need to be met in the context of the workspaces that our academic staff require. That said, Birkbeck acknowledges that with the various social and environmental and indeed financial challenges that face contemporary society an alternative, more efficient model of space use is required in order to ensure long term sustainability.

The proposed project for Gordon square will represent a pivotal moment in our move to this more efficient approach as the creation of 2 person shared office spaces will enable us to collocate two of our academic schools into the same building. Whilst this in itself is important to the institution, in the wider context it will enable us to make a substantial investment in the Listed Gordon square properties. Indeed the approach we have taken in developing our design for this project has been to focus on embracing the challenging nature of these listed buildings and adapting our layouts and working practices to function in as complimentary manner as possible with the buildings.

To that end we have worked extensively with schools to consider alternatives to the current 'single occupancy' office that the majority of our academic staff currently require. Following this work, it has been agreed that we should move to a 2 person shared office model across the schools. Whilst the view outside of the sector may well be that this is somewhat obvious and simple, it is important not to underplay the significance of this sacrifice to an academic institution. Having a private thinking space is fundamental to our academic staff, but due to the work of the design team, and indeed other interventions around the way that we will support staff beyond the physical estate, we believe it is one that we can and should make.

However, in order to deliver this new model it will be critical to deliver the number of 2 person shared offices that we require on the upper floors. This will mean that some large spaces will need to be subdivided, however in order to balance that out we will of course look to invest in restoring the historic features the more visible areas of the building (such as the ground and first floors). Much thought and negotiation has gone into settling on a 2 person office. On the basis that our academic staff are often teaching, working from home or at meetings or conferences it is felt that sharing with another person strikes the right balance between spatial efficiency and function. As soon as we modelled increased numbers, such as 3 or 4 person offices being shared this resulted in substantial negative impacts upon the ability of academic staff to perform their roles, not only as researchers, but also as personal tutors. Therefore we do not have a viable option, that can accommodate the necessary numbers of staff to collocate our two schools, unless we are able to implement the proposed subdivisions of space.

This is of course challenging and multifaceted issue which is difficult to convey in a few short paragraphs and so should any further background or detailed discussion be required we are happy to have further conversations.

# 4 Overview of the Proposals

### 4.1 External works

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

- New signage and external lighting
- Façade repairs (stucco) and cleaning (brick)
- General repairs to doors and windows.
- De-cluttering of existing cables and wires to front elevation.
- Re-instatement of missing paving flags to entrance 'bridges'
- Roofing repairs/ re-instatement

- New 'green roof' treatment to later addition flat roof areas to rear
- Small extension to rear flat roof area for modified stair design.

### 4.2 Internal works

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

- Stair alterations (to later addition staircase in rear extension)
- Infilling of light well to rear of No. 45
- Re-located WC's
- Sub-division of some office spaces
- Works to improve circulation.

# 4.3 Employment and occupancy

Because of the nature of the activity within the building, both administration and academic research, the extended teaching day (evening courses) and the fluctuations in student numbers over the academic year it is challenging to define an average occupancy for the building. It is more straightforward to model employment, and the proposal provides additional employment.

Existing	Full Time		Part Time		TOTAL	
Employed in Gordon sq.	FTE	H/C	FTE	H/C	FTE	H/C
School of Arts	106	106	11.1	24	117.1	130
Facilities	10	10			10	10
	116	116	11.1	24	127.1	140
Proposed						
Employed in Gordon sq.	FTE	H/C	FTE	H/C	FTE	H/C
School of Law	60	60	7.5	16	67.5	76
School of Arts	106	106	11.1	24	117.1	130
Facilities	10	10			10	10
	176	176	18.6	40	194.6	216

One of the key drivers of the project is Birkbeck's desire to move toward a more agile working model for staff which has been put into closer focus by the current national public health emergency. The result we are aiming to achieve is a more flexible teaching and staff working environment which supports our sessional teachers and the more full-time staff who are expressing the desire to work from home more often. Of the number stated above it would be rare to find more than half of the academic staff in on any one working day and usually less than a 1/3 at any one time as the day is extended into the evening (9pm) for teaching purposes. Admin Staff (approx. 30 Arts and 20 Law) have more regular office hours but, as trends suggest, are taking more advantage of home working initiatives.

Our teaching pedagogy is also moving to a more flexible model of learning delivery, where there will be an increase in remote and mixed-mode learning on offer to students. This continues to support Birkbeck's distinct teaching and learning offerings as an evening university catering for those who have other commitments during the day, often mature students.

The resultant effect is that although the scheme employs more staff we expect to have fewer in occupation in any one given day and that they are more evenly distributed throughout the day and evening. This has in turn led to more efficient space planning, space sharing and hot desking.

### 5: Pre-application consultation

Pre-planning advice was sought with Camden Council to discuss initial design ideas and to discuss any initial comments or concerns. Concept ideas were discussed with Planning Officer Jennifer Walsh and Conservation Officer Antonia Powell. The timeline of pre-planning application advice was as follows:

- 31st March Concept design presentation
- 26th May Updated proposals

Additional information requested by LA Officers at the initial meeting was provided at the second this included:

- Existing photos
- External Elevations where changes are proposed
- Internal elevations of partitions where we are proposing to subdivide rooms

On the 22nd July Pre-Planning advice was received from Camden Council in response to the pre-application process, these responses and our subsequent comments are summarised in section 3.1 of the D&A.

# 6 The Development Plan and Policy Designations

# 6.1 National legislation and policy

# Planning (Listed Building & Conservation Areas) Act 1990 and Planning Act 1990 (As Amended)

The overarching legislation governing the consideration of applications for planning consent that affect heritage assets is contained in the Planning (Listed Buildings and Conservation) Areas Act 1990.

**Sections 16(2) and 66(1)** of the Act require local planning authorities, in considering whether to grant listed building consent, to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses.

**Section 72** of the Act requires local planning authorities, in considering whether to grant planning permission with respect to any buildings or other land in a conservation area, to pay 'special attention [...] to the desirability of preserving or enhancing the character or appearance of that area.'

### National Planning Policy Framework (NPPF) (2019)

The NPPF was adopted in March 2012. Section 12, entitled Conserving and Enhancing the Historic Environment, contains guidance on heritage assets, which include listed buildings and conservation areas. Paragraphs 128-137 are relevant to the present application:

Paragraph 128 requires an applicant to give a summary of significance of the building or area affected, proportionate to its importance. This heritage statement provides that information at an appropriate level.

Paragraph 129 advises local authorities to take account of that significance in assessing proposals to avoid or minimise conflict between the proposals and conservation of the asset.

Paragraphs 131 and 132 emphasise the desirability of sustaining and enhancing the significance of individual assets and wider, local distinctiveness, and the desirability of viable and fitting uses for a building being found or continued.

Paragraph 134 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Additional guidance to help local authorities implement NPPF is set out in:

the Planning Practice Guidance on the government's website which provides practical advice on applying the NPPF to the planning process and guidance on interpreting the language of the NPPF.

The Good Practice Advice in Planning Note 2 entitled 'Managing Significance in Decision-Taking in the Historic Environment'. This is the most relevant to this application of a number of guidance documents by Historic England.

# 6.2 Regional policy

London Plan (2016)

In July 2011, the Mayor published an updated spatial strategy for London, the London Plan. Subsequent amendments to this plan include: *Early Minor Alterations*, to bring the 2011 London Plan up to date with changes to government policy; *Revised Early Minor Alterations* (2012); the *Further Alterations to the London Plan* (2015) which was published as the updated 2015 London Plan in March 2015; and the *Minor Alterations* (MALP), which came into effect on 1 October 2015.

### **Policy 7.8: Heritage assets and archaeology states:**

A) London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

For planning decisions, it states:

C) Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

# 6.3 Local policy

Camden Local Plan (2017)

In July 2017 Camden Council adopted the Local Plan, which has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.

### Paragraph 7.41 states:

The Council places great importance on preserving the historic environment. Under the Planning (Listed Buildings and Conservation Areas) Act the Council has a responsibility to have special regard to preserving listed buildings and must pay special attention to preserving or enhancing the character or appearance of conservation areas.

#### Paragraph 7.44 states:

Any harm to or loss of a designated heritage asset will require clear and convincing justification which must be provided by the applicant to the Council. In decision making the Council will take into consideration the scale of the harm and the significance of the asset.

### Policy D2 Heritage states that the Council will:

preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

### **Designated heritage assets**

not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

#### **Conservation areas**

e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.

### **Listed Buildings**

j. 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

### 6.4 National guidance

Planning Practice Guidance (Department of Communities and local Government) (2014) The aim of the Planning Practice Guidance (PPG) is to support implementation of the policies set out in the NPPF. The section 'Conserving and enhancing the historic environment' was last updated in April 2014.

Historic Environment Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets (Historic England, 2015)

This advice note supports the implementation of policy in the NPPF. This document sets out guidance on managing change within the settings of heritage assets including archaeological remains and historic buildings, sites, areas and landscapes. It contains

advice on the extent of setting, its relationship to views and how it contributes to significance. It also sets out a staged approach to decision-taking.

### 6.5 Local guidance

Camden Planning Guidance: Design (Camden Council, July 2015, updated March 2018) Camden Council is reviewing and updating its Planning Guidance documents to support the Camden Local Plan following its adoption in summer 2017. The update is in two phases, the first of which was completed in March 2018. CPG1 Design will come under review in the second phase, but continues to apply until it is fully updated. Section 3 of this CPG sets out further guidance on how Policy D2 Heritage from the Local Plan (2017) should be applied.

# 7 Summary of the Benefits of the Proposals

The proposed works will undo some of the damage to the historic significance and quality of interior spaces caused by mid twentieth century works, in particular the realignment of lateral connecting corridors and the removal of several modern partitions. The proposed 'walls' of the new lateral corridors are a mixture of pods or glass screens allowing the volumes of the original spaces to be read with original (and repaired) cornices visible. This will contribute to improved movement through the buildings, to be lit by natural light and improve both wayfinding and the look and feel of being within the historic buildings, an experience that is much diminished at present in the warrenlike corridors of the upper floors.

Some harm will be caused to the significance of the buildings, primarily through alterations and openings in historic fabric. This includes subdivision of small rooms at second and third floor levels, the introduction of service risers and alterations to exiting partition walls at lower levels. These works stem from the desire to improve the internal experience and quality of the spaces and to enable the building to perform and function as a high quality university building. Great care has been taken in the design of these interventions.

The Draft London Plan sets out in Policy E8 'Sector growth opportunities and clusters' that "London's higher and further education institutions and their development across all parts of London should be promoted". The project will provide much needed investment in the modernisation of teaching facilities with improved welfare facilities for staff and students. The co-location of The School of Law is crucial to the future business case for the building, which will see the buildings importance and profile expand and ensure the future stewardship of this important heritage asset.

The continued investment in the facility will not only support Birkbeck's mission of being a world-class research and teaching institution but also enable them to continue as London's only specialist provider of evening higher education – which means students can balance studying with work, family and other commitments.

This is very clearly aligned with The Local Plan Policy C2 'Community Facilities' which 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."

Supporting text (paragraph 4.32) builds on this by stating that: "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".

The proposals are accompanied by a comprehensive suite of historically appropriate maintenance and repairs on a wide and detailed scale. Many of these works, which seek to arrest decay and contribute to the longevity of the terrace, have the added benefit of improving the appearance of the listed buildings and by extension, the setting of those in the near vicinity. There are no harmful effects and some substantial benefits to the setting of the buildings, any nearby designated heritage asset, and the experience of being within Gordon Square or any other part of the conservation area.

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. 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.

The design choices of the scheme have been heritage-led and both preserve and enhance the architectural significance of the listed buildings as well as helping the terrace to continue to contribute to the character and appearance of the Bloomsbury Conservation Area. This will sustain and enhance the significance of this important heritage asset by continuing to put them to a viable use consistent with their conservation; in accordance with Policy D2 of the LB Camden's Local Plan (2017).

### 7.2 Conclusion

In conclusion, the existing buildings are tired and in need of refurbishment and modernisation in order to meet the requirements of academics, researchers and students, to ensure Birkbeck can continue to develop its unique educational offering.

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 Design and Access Statement and Heritage Statement.

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. For these reasons, it is considered that planning and listed building consent should be granted for these proposals.

# HR

ARCHITECTURE /
BUILDING CONSULTANCY
/ URBAN DESIGN &
MASTERPLANNING
/ ADVANCED DESIGN /
LANDSCAPE / INTERIORS
/ IMAGING