

London Borough of Camden Planning Services 5 Pancras Square London N1C 4AG 72 Welbeck Street, London W1G 0AY Tel. +44 (0)20 7493 3338 geraldeve.com

Our ref: LOL/NFD/SNE/SOTH/U0018054

Your ref: PP-11012578

03 February 2022

Dear Sir/ Madam

16-18, 20, 22, 23, 25, 26 Gordon Square, London Planning (Listed Building and Conservation Areas) Act 1990 Application for Listed Building Consent

We write on behalf of our client, University College London ('the Applicant'), to submit an application for listed building consent for the removal of redundant services and installation of interactive screens, wall-mounted cameras, and associated servicing at 16-18, 20, 22, 23, 25, and 26 Gordon Square ('The Site').

As such, Listed Building Consent is sought for:

"Proposed internal works to 16-18, 20, 22, 23, 25, and 26 Gordon Square, relating to the removal of redundant servicing and the installation of wall mounted interactive screens, wall mounted cameras, and associated servicing works."

Site and Surroundings

All the aforementioned buildings are located along the south-west of Gordon Square and are to the south-east of the main UCL Bloomsbury Campus. The site is currently used for educational purposes by University College London (UCL). The internal works are to be carried out within certain rooms within the buildings, with further details provided below.

The Site is designated on the Council's policies map as within the Bloomsbury Conservation Area. Numbers 16-26 Gordon Square are all Grade II listed (Listing No: 1113029 and 1113030). There are also several other listed buildings located within Gordon Square, to the north and east of the site.

Relevant Planning History

From a review of the Council's online planning register, we have provided a summary of the relevant planning applications relating to 'The Site'. Each building is dealt with individually for clarity:

16-18 Gordon Square

On 01 July 2004 listed building consent (ref: 2004/2057/L) was granted for "Internal alterations including fire doors to student accommodation."

On 22 July 2004 listed building consent (ref: 2004/2058/L) was granted for:

"Internal alterations to replace existing fire alarm system to existing student accommodation."

On 30 March 2011 listed building consent (ref: 2011/0698/L) was granted for "Internal and external alterations associated with improved accessibility into and throughout the building."

Also, on 30 March 2011 listed building consent (ref: 2011/0696/P) was granted for "Installation of a platform lift to the rear and associated alterations to hard and soft landscaping to a building within the university campus (Class D1)."

20 Gordon Square

On 31 March 2009 listed building consent (ref: 2008/5518/L) was granted for "Alterations to front and rear elevations including replacement of sash windows, installation of secondary glazing and refurbishment of roof, installation of boilers and electrical services and minor internal alterations."

22 Gordon Square

On 21 December 2009 listed building consent (ref: 2009/3655/L) was refused for "Alterations including replacement of external windows at lower ground floor level and internal alterations and refurbishments to lower ground floor level."

On 22 March 2010 listed building consent (ref: 2010/0536/L) was granted for "Internal alterations and refurbishments to lower ground floor level."

22-26 Gordon Square

On 21 June 2010 listed building consent (ref: 2010/1859/L) was granted for "The installation of an updated fire alarm system and emergency lighting system to existing University offices (Class D1).

23-26 Gordon Square

On 18 January 1988 listed building consent (ref: 8770301) was granted for "Demolition and alterations to internal partitions and doorways and the conversion of space vacated by History Library to form additional office/tutorial rooms and lecture/seminar rooms as shown on drawings 24/102/1C and 2B."

On 13 October 1993 listed building consent (ref: 9370176) was granted for "Alterations to front basement area and internal partitions at basement level as shown on drawing no. 26/101/1."

On 03 March 1995 listed building consent (ref: 9570013) was granted for "The demolition of the existing external stair and landing and the erection of a new stair and landing at the rear. as shown on drawing numbers 25-101-05 06A and 951-08-1."

25-26 Gordon Square

On 24 April 2008 listed building consent (ref: 2007/6375/L) was granted for "Internal refurbishment of existing rooms to be used as office space, including removal of non-original infill walls at lower ground floor level in Wilkins building; removal of non-original walls at no.26 Gordon Square, replacement carpet, lighting, radiator and redecoration."

26 Gordon Square

On 23 February 1970 listed building consent (ref: M13/5/A/HB83) was granted for "The erection of external railings, and the erection of internal partition at 26, Gordon Square, Camden."

On 06 August 1985 listed building consent (ref: 8570162) was granted for "The taking down and rebuilding of the top section of the north gable wall and repairs to the rendered north flank wall. ^(As shown on drawings numbered 24/101/1 & 2)."

On 08 December 2004 listed building consent (ref: 2004/4092/L) was granted for "Alterations including demolition of the buttress walls and extending the pavement vault area to 26 Gordon Square (Grade II) required by the reconfiguration of electrical services to the Panopticon site."

On 20 October 2006 listed building consent (ref: 2006/4032/L) was granted for "Variation to listed building consent dated 08.12.04 (ref. 2004/4092/L) for removal of vault no.3, removal and reinstatement of stairs and railing, addition of ventilation louvered panel below stairs, sealing of door opening beneath stair, removal and reinstatement of wall below stair, addition of steps, steel straps and ties in connection with alterations including demolition of the buttress walls and extending the pavement vault area to 26 Gordon Square (Grade II) required by the reconfiguration of electrical services to the Panopticon site."

On 24 April 2008 listed building consent (ref: 2007/6375/L) was granted for "Internal refurbishment of existing rooms to be used as office space, including removal of non-original infill walls at lower ground floor level in Wilkins building; removal of non-original walls at no.26 Gordon Square, replacement carpet, lighting, radiator and redecoration.

The relevant planning history above evidences a number of works that have been approved and undertaken over the years to these listed buildings.

Background and Proposals

The aim of the proposals is to create more contemporary workspaces for those utilising the classrooms to which this application relates to. This is done by improving the practicality of each room through the installation of modern technological and educational appliances. The removal of redundant services will also improve the efficiency of each classroom by making room for more relevant teaching instruments whilst also providing improvements to the functionality and appearance of the listed buildings internally.

A summary of the proposed works has been provided in the table below for ease of reference.

Building	Room	Proposed Installation Works	Proposed Removal Works
16-18	B02	-new low-level trunking to extend the existing trunking around the room - 2x surface mounted 20mm conduits to be installed rising from the new trunking to serve brush plate and double socket outlet -1x new AV LCD screen	-1x screen -1x lectern and associated cables
	B03	-replace existing screen	n/a
	B09	-2x surface mounted 20mm conduits dropping from high level trunking to serve brush plate and double socket outlet -1x new AV LCD screen	-3x conduits -dado trunking on left hand-side of room -1x projector -2x speakers
	B10	-2x surface mounted 20mm conduits rising from existing dado trunking to serve brush plate and double socket outlet -1x new AV LCD screen	-1x whiteboard -1x data outlet and associated containment
	G01	-2x surface mounted 20mm conduits rising from existing trunking to serve brush plate and double socket outlet -1x new AV LCD screen	-1x projector-2x speakers-1x towel dispenser-1x projection board
	G06	-2x surface mounted 20mm conduits dropping from existing trunking to serve brush plate and double socket outlet -1x new AV LCD screen	-1x projector-2x speakers-1x towel dispenser-1x projection board
	G09	-2x surface mounted 20mm conduits dropping from high level trunking to serve brush plate and double socket outlet -1x new AV LCD screen	-1x projector -2x speakers

	101	-1x camera -2x surface mounted 20mm conduits dropping from high level trunking to serve brush plate and double socket outlet -1x new AV LCD screen	-1x projector-1x towel dispenser-1x projection board-speakers to be replaced
20	В03	-2x surface mounted 20mm conduits to rise from low level trunking to serve brush plate and double socket outlet -1x new AV LCD screen	-1x projector-2x speakers-1x projection board
22	B15	 -new surface dado trunking -2x 20mm conduits rise from the new dado trunking to serve brush plate and double socket outlet -1x new AV LCD screen 	-nothing removed
23	101	-2x surface mounted 20mm conduits dropped from high level trunking to serve brush plate and double socket outlet -1x new AV LCD screen	-1x projector -2x speakers -1x projection board
	102	-extend existing surface trunking -2x surface mounted 20mm conduits dropped from high level trunking to serve brush plate and double socket outlet -1x new AV LCD screen	-1x projector -2x speakers -1x projection board
25	B26	-no new installations	-1x mounted metal box-redundant AV controller/ outlets-input plate
	B30	-2x surface mounted 20mm conduits to rise from low level trunking to serve brush plate and double socket outlet -1x new AV LCD screen.	-2x speakers -1x LCD screen on chimney breast
26	B32	-2x surface mounted 20mm conduits dropped from high level trunking to serve brush	-2x projectors-4x speakers-2x towel dispensers-2x projection boards

	plate and double socket outlet -1x new AV LCD screen.	
G09	-2x surface mounted 20mm conduits to rise from low level trunking to serve brush plate and double socket outlet -1x new AV LCD screen.	 -2x projectors -2x speakers -2x towel dispensers -2x projection boards -redundant vertical trunking by window
G10	-2x surface mounted 20mm conduits dropped from high level trunking to serve brush plate and double socket outlet -1x new AV LCD screen	-2x projectors-2x speakers-2x towel dispensers-2x projection boards

The physical works proposed are outlined in further detail within the supporting planning drawings, prepared by Fowler Martin.

Local Development Framework

The London Borough of Camden's Local Development Framework comprises of the following planning policy documents: The London Plan (2021) and the Camden Local Plan (2017).

In addition, the National Planning Policy Framework (2021) is a material consideration.

Camden also have a number of adopted Planning Guidance documents which would be a material consideration.

Statutory Legislation

Statute regarding the heritage environment is relevant to this application. Both the site's historic fabric and the surrounding environment have been carefully considered in the development of the proposals having regard for the statutory legislation set out below.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that local planning authorities should pay special regard to the desirability of preserving a listed building or its setting or any features of historic or architectural interest which it possesses when considering applications.

Section 72 of the same Act states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

National Planning Policy Framework

Under paragraph 194 of the NPPF, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including the contribution made by their setting. Paragraph 197 states that in determining planning applications, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation:
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
- The desirability of new development making a positive contribution to local character and distinctiveness.

Where a development proposal will lead to a 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 (paragraph 202).

Planning Assessment

Heritage and Design

Camden's Local Plan Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, especially the conservation areas and listed buildings. To maintain the character of Camden's conservation areas, the Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. The Council will also resist development that would cause harm to the significance of a listed building through an effect on its setting or would cause harm to its special architectural and historical interest.

The proposed works seek to enhance the facilities by updating the means of teaching within the aforementioned buildings. The internal changes will not affect views of the site from the conservation area and will therefore maintain the character and appearance of the Conservation Area.

All of the aforementioned buildings are Grade II listed (16-25 Gordon Square – List Ref. 1113029; and 26 Gordon Square – List Ref. 1113030). The official list entries for the buildings focus their descriptions specifically on the exterior of the buildings with no reference to interior features.

The proposed internal works seek to be installed in locations minimising impact on historical features, whilst also using reversible fixing techniques. In addition, the proposed works propose to remove elements of redundant equipment, servicing and trunking within the aforementioned rooms which is a benefit in improving the visual appearance and as a means of decluttering the spaces affected by the works. As the works are minor in nature and any fixings would be reversible, the proposals are not considered to cause harm to the special architectural or historical interest of the buildings. Should the Council consider the proposed works to lead to a less than substantial harm, we would consider that the notable benefits to education through the installation of the proposals would outweigh the harm caused in this instance.

Furthermore, as no changes are proposed to the exterior of the building, the external character and appearance of the listed building and the conservation area will be preserved and remain the same.

The proposals are therefore considered to comply with relevant national and local planning policy and meet the statutory tests of Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and Local Plan Policy D2.

Enhancing Community Facilities

Local Plan Policy C2 states that Camden 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.

The proposed works are part of wider investment plan by UCL to improve IT facilities across the university campus. The installation of the proposed equipment will assist in providing modern, fit-for-purpose teaching spaces which meet the current requirements of students and staff of the university. In turn, this will assist in enhancing the teaching facilities and level of education provided to students.

Therefore, based on the enhancements the proposed works will provide to the existing educational use, the proposal complies with Local Plan Policy C2.

Summary

The proposal is to create more contemporary workspaces for those utilising the classrooms in the aforementioned buildings. The proposal has carefully considered the sensitivity of the listed buildings and are therefore non-intrusive. There are no external works thus the proposal will not affect the nearby conservation area in any way. All elements are assessed against policy and are all deemed compliant. It is considered that there are no material considerations of sufficient weight to determine that the application is determined other than in accordance with the Development Plan. On this basis, planning permission should be granted for the application accordingly.

Application Documents

Please find enclosed the following documents in support of this application:

- Cover Letter, prepared by Gerald Eve;
- · Application Form, prepared by Gerald Eve;
- Existing and Proposed Drawings and Elevations, prepared by Fowler Martin and University College London;
- Statement of Works, prepared by Fowler Martin; and
- Design and Access Statement, prepared by Gerald Eve.

As this is a listed building consent application, there is no application fee.

We look forward to your confirmation of the validation of this application. In the meantime, please contact Sam Neal (020 3486 3312) or Sophie Thomson (020 7333 6297) of this office should you have any questions.

Yours faithfully,

Gerald Eve LLP

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