



# GERALDEVE

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Planning – Development Control  
Camden Council  
Camden Town Hall  
London  
WC1H 8ND

**Our ref: LEO/EKI/PIR/U0014488**

**Your ref: PP- 11205560**

6th June 2022

Dear Sir or Madam

**University College London, South Wing, Gower Street, London, WC1E 6BT  
Application for Listed Building Consent  
Planning (Listed Buildings and Conservation Area Act) 1990 (as amended)  
Design and Access Statement / Heritage Statement**

On behalf of our client, University College London, we write to submit an application for Listed Building Consent for internal alterations to the South Wing, Gower Street, London, WC1E 6BT (hereafter known as the 'Site').

Listed Building Consent is sought for the following:

**“Installation of eight Wi-Fi access points at ground, first and second floor and removal of redundant fixtures and fittings at first floor”**

## **Background**

The South Wing forms part of the main UCL campus and adjoins the Chadwick Building to the west and the Wilkins Building to east. The property is listed as a single entry '*University College (University of London) and attached railings to north and south wing*' and is Grade I Listed. A separate listing exists for the two observatories in the central courtyard, which are Grade II Listed.

The Site is also located within the Bloomsbury Conservation Area.

The proposed works have been discussed extensively with Camden officers prior to the submission of this application. A site visit was carried out on the 29 September 2021 and the works were subsequently discussed at the monthly PPA meeting.

The feedback received from officers was that, whilst the proposed works were likely to be supported, consideration should be given to the rationalisation of existing services, to ensure that the proposed works do not amount to further cluttering of the heritage asset.

Following this feedback, the project team have undertaken a review of existing fixtures and fittings and have identified a number of redundant services at first floor level which, under this application, are scheduled for removal. Further details of these fixtures can be found within the accompanying proposal summary, prepared by Kendall Kingscott.

## **Development proposals**

UCL has a requirement to improve their existing Wi-Fi service within South Wing, as part of their commitment to improving student experience. In order to achieve this, 8 new Wi-Fi access points, measuring approximately 210mm x 210mm x 50mm, are required to be installed. Of the 8, 5 are proposed to be located at ground floor, 2 at first floor and 1 at second floor.

In order to limit the impact on the historic fabric, the majority of the access points are proposed to be mounted to plasterboard ceilings or directly to walls with suitable fixings. New cabling is proposed to be limited, with the existing data cabling repurposed.

In order to mitigate the impact of the additional fixings and ensure that the internal walls are not cluttered with modern features, the lighting tracks, fittings, and redundant power supplies at first floor will be removed, and the walls made good. In order to achieve this, the holes made to accommodate the fixtures will be filled with a lime-based plaster before the areas are rubbed down and made ready for decoration.

## **Development Plan**

The Development Plan comprises:

The London Plan (2021); and

The Camden Local Plan (2017).

The National Planning Policy Framework (2021) is also a material consideration.

## **Legislative Framework**

Section 16 of Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant listed building consent, special regard shall be paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

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.

The Framework goes on to state under paragraph 202 that 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.

## **Planning Assessment**

As this is an application for Listed Building Consent, the primary consideration is the impact of the works on the special architectural and historic interest of the Grade I Listed Building.

Policy D2 (Heritage) states that the Council will preserve and where appropriate enhance heritage assets and their settings. In relation to Listed Buildings, the policy states that any extension or alteration which would result in harm to the special architectural or historic interest will be resisted, unless it can be demonstrated that the harm or loss is necessary to achieve substantial public benefits

Furthermore, Policy D1 (Design) states that the Council will seek to secure high quality design in development. In order to achieve this overriding aim, development must preserve or enhance the historic environment and heritage assets in accordance with Policy D1, amongst other factors.

In this case, the works involve limited interventions to the historic fabric. At ground floor level, five new Wi-Fi access points are proposed to be installed. Of these, four of the access points and their associated cabling are proposed to be fed through and mounted onto the more modern mezzanine level, which planning history indicates was granted consent in 2011 (ref. LSX0004950). Whilst the remaining ground floor Wi-Fi access point is to be wall mounted, the supporting information confirms that this would involve the removal of a very small amount of fabric to fix the necessary wall bracket. Furthermore, the associated cables will be fed through existing wall mounted trunking.

At first floor, two Wi-Fi access points are proposed to be fixed to the walls. As with that proposed at ground floor, this would involve the removal of a very small amount of fabric for the holes required to accommodate the wall bracket. At second floor the access point and associated cabling is proposed to be sensitively located on the modern plasterboard ductwork bulkhead.

As above, the internal works required to accommodate the necessary access points would be very limited. In terms of their visual appearance, the access points themselves would be modest in their proportions, measuring approximately 210mm x 210mm x 50mm. As such they would not be obtrusive additions and would not detract from the special architecture or historic interest of the listed building.

Nevertheless, in order to mitigate the impact of the additional fixings and ensure that the internal walls are not cluttered with modern features, the lighting tracks, fittings, and redundant power supplies at first floor are proposed to be removed, and the walls made good with a lime-based plaster.

No external alterations to the Listed Building are required to accommodate the works, and therefore there would be no impact in this regard.

The works proposed would help to support and improve the functionality of an established educational institution. Policy C2 (Community Facilities) of Camden's Local Plan specifically states that the Council will support the investment plans of educational research bodies to expand and enhance their operations, having regard to the social and economic benefits they generate.

The proposed works are therefore considered to be in full accordance with Local Plan Policy D1 and D2, as well as relevant national policy. Furthermore, the works would meet the statutory test of Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

## **Conclusion**

In conclusion, the proposed development is considered to comply with relevant policies of the Camden Local Plan, namely Policies D1 and D2. Furthermore, the works would accord with the Planning (Listed Buildings and Conservation Areas) Act 1990 and Section 16 of the NPPF. The majority of the Wi-Fi access points would be fixed to modern fabric, and where this can not be achieved the proposed works would involve the removal of very modest areas of historic fabric to accommodate fixing brackets. In addition, the works would involve the removal of a number of unsightly redundant fixtures and fittings which would help to declutter the appearance of the first floor. The proposed development would therefore preserve the special architectural and historic interest of the Grade I Listed Building.

## **Application Enclosures**

As part of the submission of the application on the Planning Portal, we enclose the following documents:

- Cover letter (with Heritage Statement), prepared by Gerald Eve;
- Application Form, prepared by Gerald Eve;
- Site Location Plan, prepared by Kendall Kingscott;
- Proposed and existing floor plans, prepared by Kendall Kingscott;
- Schedule of Works and photographs showing the areas affected by the proposed development, prepared by Kendall Kingscott.

As this is an application for listed building consent, no fee is payable.

In the meantime, should you have any questions, please do not hesitate to contact Edward Kitchen (0203 486 3312) or Paige Ireland (0207 333 6277) of this office.

Yours sincerely,

*Gerald Eve LLP*

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