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London Borough of Camden Planning Services 5 Pancras Square London NC1 4AG

29 July 2022

Our ref: LEOL/SNE/HSC/U0019862

Your ref: PP-11381795

Dear Sir / Madam

26 Bedford Way, London, WC1H 0DS
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 and replacement of lighting fixtures at the third floor of 26 Bedford Way, London, WC1H 0DS ('The Site').

As such, Listed Building Consent is sought for:

"Proposed internal works to the third floor of 26 Bedford Way, relating to the removal and the installation of replacement lighting and associated controls, fixtures and fittings."

Site and Surroundings

This application relates solely to the third floor of 26 Bedford Way.

26 Bedford Way is located south-west of Tavistock Square Gardens and 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 on the third floor of the building, further details are provided below.

The Site is designated on the Council's Policy Map as within the Bloomsbury Conservation Area. 26 Bedford Way is a Grade II* listed building (listing no: 1246932). 17 and 20 Bedford Way are also included within the same listing. There are also several other listed buildings nearby, to the west of 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'. These are set out below:



On 21 June 2016, Listed Building Consent (ref. 2016/1261/L) was granted for "Partial refurbishment and reconfiguration of existing office, teaching, and laboratory space on 3rd floor."

On 05 May 2006, Listed Building Consent (ref. 2006/0983/L) was granted for "Partial refurbishment of existing office, teaching and laboratory space and rationalisation of existing and provision of new plant associated with internal refurbishment."

Other permissions on the Site relate to either external works, or refurbishment works to floors other than the one where the proposed works are due to be carried out.

Background and Proposals

The aim of proposals is to replace the existing fluorescent lighting with the LED equivalent and upgrade the lighting controls. The proposals will improve the practicality of each room and the removal of redundant services will improve efficiency.

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

Room	Proposed Installation Works	Proposed Removal Works
301 Office	Replacement LED luminaire to be installed. Surface mounted containment to be installed for the new fitting in keeping with containment already installed on the ceilings/walls.	Existing luminaire to be removed.
302 Office	Replacement LED luminaire to be installed. Surface mounted containment to be installed for the new fitting in keeping with containment already installed on the ceilings/walls.	Existing luminaire to be removed.
303 Office	Replacement LED luminaire to be installed. Surface mounted containment to be installed for the new fitting in keeping with containment already installed on the ceilings/walls.	Existing luminaire to be removed.
304 Office	Replacement LED luminaire to be installed. Surface mounted containment to be installed for the new fitting in keeping with containment already installed on the ceilings/walls.	Existing luminaire to be removed.



305 Classroom	Replacement LED luminaire to be installed. All containment will be hidden within the ceiling void as currently onsite. Currently, lighting controls cabling is chased to a switch. New installation to reuse cable route.	Existing ceiling tile luminaire to be removed.
306 Office	Replacement LED luminaire to be installed. Existing containment with ceiling void to be used if possible, if not surface mounted containment to be installed on the false ceiling for the new fitting in keeping with containment already installed on the ceilings/walls.	Existing luminaire to be removed
307 Office	Replacement LED luminaire to be installed. Existing containment with ceiling void to be used, if possible, if not surface mounted containment to be installed on the false ceiling for the new fitting in keeping with containment already installed on the ceilings/walls.	Existing luminaire to be removed
308 Lounge	Replacement LED luminaire to be installed. Existing suspension fixtures and containment to be utilised.	Existing luminaire to be removed
352 Female WC	Replacement LED luminaire to be installed. Existing containment in ceiling void to be utilised	Existing luminaire to be removed
356 Male WC	Replacement LED luminaire to be installed. Existing containment in ceiling void to be utilised.	Existing luminaire to be removed
309 Store	Replacement LED luminaire to be installed. Existing luminaire to be removed and replaced with LED equivalent.	Existing luminaire to be removed
310 Breakout Area	Replacement LED luminaire to be installed. Existing suspension fixtures and containment to be utilised.	Existing luminaire to be removed
311 Office	Replacement LED luminaire to be installed. Existing containment with ceiling void to be used, if possible, if	Existing luminaire to be removed



	not surface mounted containment to be installed on the plasterboard ceiling for the new fitting in keeping with containment already installed within the 3 rd floor.	
312 Computing Lab	Replacement LED luminaire to be installed. Existing containment with ceiling void to be used, if possible, if not surface mounted containment to be installed on the plasterboard ceiling for the new fitting in keeping with containment already installed within the 3rdfloor. If existing chased containment cannot be used a new surface conduit to drop from high level to serve new lighting controls.	Existing luminaire to be removed
313 Classroom	Replacement LED luminaire to be installed. Existing containment to be utilised. If existing chased containment cannot be used a new surface conduit to drop from high level to serve new lighting controls.	Existing luminaire to be removed
314 Kitchen	Installation of LED luminaire. Existing containment to be utilised.	Existing luminaire to be removed.
314A Office	Installation of LED luminaire. Existing containment to be utilised.	Existing luminaire to be removed.
316 Computer Cluster Room	Installation of LED luminaire. Existing containment to be utilised.	Existing luminaire to be removed.

The existing conduit systems will be utilised to supply the new lights, where this is not possible new conduits will be installed between the lights.

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 has several adopted Planning Guidance documents which are also 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 Local Plan Policy D1 sets out that the Council will seek to secure high quality design in development and requires that development respects local context and character.

Camden 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 replace some of existing fluorescent lighting with LED equivalents and upgraded lighting controls, located on the third floor. Where possible existing containment will be utilised. New containment may be required in some instances, where this is the case, in line with the existing services containment, the containment will be service galvanised conduit. The proposed internal works seek to be installed in locations minimising impact on historical features. 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.

26 Bedford Way is a Grade II* listed building (Listing. 1246932). The official list entry for the buildings primarily focusses on descriptions on the exterior of the buildings. In relation to the interior, the official list entry highlights the areas of special interest which include the lift lobbies, the entrance hall and the principal stair to the lecture theatre. The proposals will not impact upon these special interest interior features.

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 and operational efficiency 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 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. The proposed works will enhance the existing educational use, the proposal therefore complies with Local Plan Policy C2.

Summary

The proposal seeks to upgrade some of the lighting and associated fixtures at the third floor of 26 Bedford Way. 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 Conservation Area or the exterior of the Listed Building 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;
- Design and Access Statement, prepared by Gerald Eve;
- Location Plan (ref. 085-SLP01);
- Existing and Proposed Layout plans:
 - Third Floor existing Electrical Services Layout (Ref. 2173-FM-XX-03-DR-E-110 T01)
 - Proposed Third Floor office Lighting Upgrade Layout (Ref. 2173-FM-XX-03-DR-E-5100 T01)
- Scope of Works document, prepared by Fowler Martin.
- **Technical Specifications:**
 - PopPack LED Batton Luminaire
 - IQ Beam Recessed Modular LED Luminaire
 - Katona Square Functional LED Luminaire
 - SUPERSYSTEM integral collection light inserts / track
 - SLOTLIGHT infinity surface-mount/pendant IP20/IP40 Channel for LED light line

As the application relates to Listed Building Consent, no fee is required.

We look forward to your confirmation of the validation of this application. In the meantime, please contact Sam Neal (sneal@geraldeve.com / 07768 131779) or Hannah Scott (hscott@geraldeve.com / 07553 745537) of this office should you have any questions.

Yours faithfully

Gerald Eve LLP

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