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Planning and Development
Camden Council
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Your ref: PP-12365494

22 August 2023

Institute of Education, 20 Bedford Way, WC1H 0AL
Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)
Town and Country Planning Act 1990 (as amended)
Application for Full Planning Permission and Listed Building Consent

On behalf of our client, University College London, we write to submit an application for full planning and listed building consent for external lighting to of the Institute of Education, 20 Bedford Way, WC1E 6BT.

Full Planning Permission and Listed Building Consent is sought for:

“Installation of external lighting to the fourth-floor façade and terrace and associated works to the fifth-floor terrace.”

Site and Surroundings

The site comprises part of the Grade II* listed Institute of Education Building which is located within the Bloomsbury Conservation Area and to the south-eastern edge of UCL Bloomsbury Campus.

The site is bounded to the north by Gordon Square, to the east by Bedford Way and the Royal National Hotel, to the south by Russell Square, to the west by the Woburn Square terraces and the School of Oriental and African Studies (SOAS).

Within close vicinity of the building are Russell Square and Woburn Square. Both squares are protected as designated open spaces, whilst Russell Square is also Grade II and listed on the Register of Historic Parks and Gardens.

The surrounding area is characterised by a mix of uses including retail, residential, hotel and office.

Planning History

The planning history relating to the Institute of Education is extensive, and as such we have provided a summary of relevant planning applications below:

On the 15 June 2020, planning permission (ref.2020/1520/P) and listed building consent was granted (ref.

2020/1567/L) was granted for the “Refurbishment and reconfiguration of selected areas of the Institute of Education comprising: repairs and installation of insulation to the external terraces; creation of a new plant room at Level 8 Wing A and installation of new louvres to serve this plant room; refurbishment and repairs to the lobby roof on level 4 and the roof at Level 10; installation of new external gate at Level 5 of Wing A; and associated works.”

On the 14 November 2018, listed building consent (ref. 2018/33221/L) was granted for the “Refurbishment involving internal and external changes to Levels 2, 4 and 5 of Wing A of the GII* listed Institute of Education building, including: a new student bar, new teaching and study spaces, staff offices and associated facilities, the installation of secondary glazing and a new servicing strategy, new louvres to external facade; new doors to access external terraces at Levels 4 and 5; the replacement of a roof light at Level 4; and the insulation of the terrace at Level 4 and 5.”

On the 14 November 2018, planning permission (ref. 2018/2874/P) was granted for the “Refurbishment of Levels 2, 4 and 5 of Wing A to provide a replacement students bar to lv.4 (Use Class A4) as well as new teaching and study spaces, staff offices and associated facilities (Use Class D1). External alterations incl. to additions/ relocation of external doors to terraces; replacement terrace rooflight; raising level of terraces to allow for added insulation; and to raise height of existing terrace balustrades. Replacement HVAC system involving the removal of existing plant to lv.4 terrace and relocation to new plant room with associated installation of external louvres.”

On the 8 March 2018, planning permission (2017/7062/P) and listed building consent (ref.2018/0257/L) “Installation of a temporary marquee on the rear terrace of the Institute of Education for use as an ancillary student union bar, for a 12-month period.”

Proposals

The fourth-floor terrace forms the external area of the Student Union Bar and is also used as the main route of emergency egress from the Bar. At present, the terrace is lit by a number of low-level light fixtures which are mounted to the terrace wall. However, it has been found that the current lighting is inadequate, and improved lighting is required in order to improve the safety and security of this area.

It is therefore proposed to replace and upgrade the existing wall mounted lighting fixtures with those of a similar design in the same location, and thereby utilising the same routes. The existing low-level lighting is also proposed to be supplemented by a number of emergency lighting fixtures, located adjacent the existing fixtures. This ensures that the additional fixtures can utilise existing routes, and although there would be a requirement for modest conduit extensions, the proposed arrangement limits this as far as possible.

In order to ensure that the terrace area is adequately lit in future, it is also proposed to install floodlights which are proposed to be clamped to the fourth-floor façade, so fixtures can be easily removed without any damage to the cladding. The fixtures themselves are modest in size and limited in number and the colour ensures that they will not be overly prominent additions. Whilst the new lighting facilitates the requirement for an additional route, this has been sensitively located at fifth floor level, utilising a conduit affixed to the lower part of the fifth-floor balustrade and designed to be similar in colour so not to appear visually prominent.

Local Development Framework

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications and applications for listed building consent to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.

The London Borough of Camden’s Local Development Framework comprises of the following planning policy documents:

- The London Plan (2021); and
- Camden Local Plan (2017).

The National Planning Policy Framework (2021) is 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 to the statutory legislation set out below.

Section 16 of the 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 architectural or historic interest which it possesses.

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 considered 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.

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

Design and Heritage

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 II* Listed Building.

Policy D1 of the Local Plan sets out that the Council will seek to secure high quality design that, amongst other things, respects local context and character and preserves or enhances the historic environment and heritage assets.

Policy D2 of the Local Plan sets out that the Council will seek to 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 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 historic interest.

The proposed works seek to enhance UCL facilities through improving safety and security at the Grade II* Institute of Education which falls within the Bloomsbury Conservation Area.

To assess the impact of the proposals on the significance of the listed building, and the conservation area, a Heritage Assessment has been submitted, prepared by Gerald Eve, and appended to this letter. In summary, the works to the exterior of the building are considered limited in nature and largely involve the replacement of fixtures and the reusing of existing routes. Where additional lighting is proposed at lower level, this is proposed to be sensitively located so to ensure that the required conduit extensions are very limited. Although the fourth-floor terrace is considered to be an area of significance, the interventions to the fabric to accommodate the additional fixtures will be very limited, reversible, and the alterations will not affect the significance of the building.

The floodlights are proposed to be clamped to the fourth-floor façade rather than permanently fixed and therefore would be entirely reversible. Whilst the lighting requires the installation of a new route, this has been sensitively located to the balustrade at fifth floor level and has been designed to be similar in appearance to this. These alterations would not affect the significance of the building.

In relation to the impact on the conservation area, the majority of lighting would be at low level and therefore would not be readily visible from the wider conservation area. Furthermore, the floodlights are limited in number and have been designed to ensure that they are subtle and sympathetic additions.

Overall, the proposed works would preserve the significance of the listed building and the character and appearance of the Bloomsbury Conservation Area. The proposed works are therefore considered to be in accordance with Local Plan Policy D1 and D2, as well as relevant national policy. Furthermore, the works would meet the statutory tests of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Educational Use

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 lighting to the Institute of Education will improve the safety and security of this area of the building and will assist in providing fit-for-purpose ancillary space which meets the needs of, and better ensures the safety of, students and staff of the university.

Conclusion

The proposed works are required to improve safety and security of the terraces of the Institute of Education.

The proposed works are considered to be sensitive to the heritage asset and have sought to limit any impact on the historic fabric. Whilst the changes are external, the location, number and design of the fixtures have been sensitively considered so to ensure that there would not be a negative impact on the character and appearance of the wider Conservation Area.

Therefore, we consider that the proposal is in accordance with the Development Plan and should be determined positively without delay.

Application Enclosures

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

- Application form, prepared by Gerald Eve;
- Covering letter, and appended Heritage Assessment, prepared by Gerald Eve LLP;
- Design and Access Statement, prepared by Gerald Eve;
- Site Location Plan, prepared by Alpine;

- Existing and Proposed Drawings, prepared by Alpine;
- Project outline and photographic schedule report, prepared by Alpine.

The application fee of £234.00 (including £64.00 Planning Portal fee) has been paid via the Planning Portal.

Should you have any questions, please do not hesitate to contact Paige Ireland (0207 333 6277) of this office.

We look forward to hearing from you shortly.

Yours faithfully



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Heritage Assessment

Introduction

1. On behalf of UCL, Gerald Eve has prepared a Heritage Assessment to accompany the planning and listed building application relating to the external lighting works at the Institute of Education.
2. The Heritage Assessment includes the significance of those parts of the building where the proposed works are taking place, a summary of the proposals and an assessment of how the proposals impact the heritage significance of the asset as a whole. The assessment also considers the effect of the proposals on the Bloomsbury Conservation Area.

Statutory Framework

3. The statutory provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 are relevant to this application. Both the buildings fabric and setting have been considered in the development of the proposals having regard to the legislation set out below.
4. Section 16 of the Planning (Listed Building and Conservation Areas) Act 1990 states that in considering whether to grant listed building consent, special regard be paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
5. Section 66 of the Planning (Listed Building 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 considered applications.
6. 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.

Planning Policy Context

7. 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:
8. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weight against the public benefits of the proposal, including securing its optimum viable use (paragraph 202).

9. Policy D1 of the Local Plan sets out that the Council will seek to secure high quality design that, amongst other things, respects local context and character and preserves or enhances the historic environment and heritage assets.
10. Policy D2 of the Local Plan sets out that the Council will seek to 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 and 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.

Assessment of Significance

11. The building is Grade II* listed located along Bedford Way in the London Borough of Camden.
12. The building was listed in December 2000 (Listed Entry: 1246932), with the list description for the exterior stating the following:

"University teaching building building, 1970-6 by Denys Lasdun and Partners, extended 1990-3, also by Sir Denys Lasdun and Partners. In situ reinforced concrete and precast mullions with a cladding of prefabricated bronze-anodised aluminium panels and window sections. In plan the building makes a strong barrier to the traffic of Bedford Way while extending the concept of flexible teaching space already explored at the University of East Anglia, Norwich. Six storeys above ground, with three basement storeys, in 1999 numbered 1-9. Flat, paved roof. Long spinal range, with wing to rear, and footings for a second incorporated in 1990-3 library extension. Large basement includes lecture theatre, the Logan Hall, under forecourt facing Lasdun's extension to the School of Oriental and African Studies opposite; conference facilities, students' union and service entrance. Split-level entrance hall gives on to library, drama studio and bookshop, with flexible teaching areas above, mainly facing street, and tutorial rooms, mainly facing courtyard and in wing.

The elevational treatment is in Lasdun's mature language of strata and towers, a grid of aluminium panels and glazing set over concrete plinth on western elevation, with massively over-scaled concrete staircase towers. On the eastern elevation to Bedford Way, the entrance floors are set back behind exposed frame, and has cut-back corners which demonstrate the smooth, sharp concrete particularly forcefully. The quality of finishes is exceptional, and the contrasting texture of materials unique in Lasdun's surviving work. The single spur that was built is highly sculptural, with a striking silhouette of angular concrete escape stairs rising above the floor levels and curtain walling. A similar system of anodised aluminium and glass was adopted by Lasdun for his extension, but with more pronounced

glazing bars, and with three pyramidal roof lights that are the clearest indication of the new work. Entrance doors in anodised aluminium surrounds. New entrance on Bedford Way, reached up steps, installed by Lasdun in 1993.”

13. The works are external only and primarily relate to the fourth-floor terrace and façade, although fixings are also proposed to the fifth-floor balustrade. There is already wall mounted lighting to the fourth-floor terrace. The external terraces on Levels 4 and 5, feature concrete and bronze anodised aluminium panel walls with metal balustrades which are considered to contribute to the west wing’s distinctive architecture which is highly significant.
14. The site is also located within the Bloomsbury Conservation Area. The Bloomsbury Conservation Area covers an area of approximately 160 hectares extending from Euston Road in the north to High Holborn and Lincoln’s Inn Fields in the south and from Tottenham Court Road in the west to Kings Cross in the east.
15. The Site falls within Sub-Area 3 (London University /British Museum) of the Conservation Area Designation. The building is noted in the Bloomsbury Conservation Area Appraisal (2011) as a notable example of British Brutalist Architecture.

The Proposals and their Impact on Significance

16. The external lighting works are required in order to improve the functionality, security, and safety, of the external terrace area which forms the external space to the Institute Bar.
17. For ease of reference, a summary of the proposed works has been listed below. Further details can be found in the supporting covering letter, prepared by Gerald Eve, and drawings, and schedule of works, prepared by Alpine.

The works are as follows:

- Replacement of existing wall mounted lighting to the fourth terrace with fixtures of a similar appearance, in the same location and, utilising the same routes.
- The additional of emergency light fixtures, located adjacent to the existing wall mounted fixtures, utilising the same routes but requiring modest conduit extensions.
- The addition of floodlights fixed with bespoke clamps to the fourth-floor façade with the route attached to the fifth-floor balustrade.

18. The proposed terrace already benefits from lighting mounted to the concrete wall, although this is currently inadequate and does not ensure the safety and security of the external space. In order to

improve this, the existing lighting is proposed to be replaced with stronger lighting of a similar design, in the same locations and utilising the same routes.

19. Whilst the proposal also includes the installation of a limited number of emergency light fixtures, these are also proposed to utilise existing routes where possible. Whilst modest conduit extensions would be required in order to accommodate these, the extent to which further interventions to the concrete would be required would be very limited.
20. In terms of the floodlights, these have been designed to be entirely reversible and are proposed to be fixed to the façade with a clamp, meaning there would be no requirement for drilling etc. into the fabric. The floodlights would be limited in size and number meaning main public views would be largely unaffected. Whilst a new route to serve the lighting would be required, this is proposed to be fixed to the fifth-floor balustrade.
21. In summary, the works to the exterior of the building are considered limited in nature and largely involve the replacement of fixtures and the reusing of existing routes. Where additional lighting is proposed at lower level, this is proposed to be sensitively located so to ensure that the required conduit extensions are very limited. Although the fourth-floor terrace is considered to be an area of significance, the interventions to the fabric to accommodate the additional fixtures will be very limited, reversible, and the alterations will not affect the significance of the building.
22. The floodlights are proposed to be clamped to the fourth-floor façade rather than permanently fixed and therefore would be entirely reversible. Whilst the lighting requires the installation of a new route, this has been sensitively located to the lower part of the fifth-floor balustrade and has been designed to be similar in appearance to this. This alteration would also not affect the overall significance of the building.
23. In relation to the impact on the conservation area, the majority of lighting would at low level and therefore would not be readily visible from the wider conservation area. Furthermore, the floodlights are limited in number and have been designed to ensure that main public views of the building would be largely unaffected. As such, the proposed works are considered to preserve the character and appearance of the Conservation Area.
24. Overall, the proposed works would preserve the special architectural and historic significance of the listed building and the character and appearance of the Bloomsbury Conservation Area. Therefore, they are considered to be in accordance with Local Plan Policies D1 and D2, as well as relevant national policy relating to the historic environment. Furthermore, the applications would satisfy the statutory provisions of the Planning (Listed Building and Conservation Areas) Act 1990.

