



GERALDEVE
A NEWMARK COMPANY

London Borough of Camden
Planning and Borough Development
5 Pancras Square
London
N1C 4AG

One Fitzroy 6 Mortimer Street
London W1T 3JJ
Tel. +44 (0)20 7493 3338
geraldve.com

FAO: Edward Hodgson

Our ref: LEO/PIR/U0025568

Your ref: PP-12800420

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

We write on behalf of our client, University College London ('UCL') (the 'Applicant') to submit an application for planning and listed building consent for the provision of three external structures to provide catering to the Institute of Education ('IoE').

Planning permission is sought for:

"Installation of three external catering structures on the forecourt for a temporary period of four years."

Listed Building Consent is sought for:

"Installation of three external catering structures on the forecourt for a temporary period of four years."

Site and Background

The Site comprises the forecourt area to the rear of the Institute of Education ('IoE') which is a Grade II* Listed Building designed by Architect Sir Denys Lasdun.

The Site is located within the Bloomsbury Conservation Area and there are a number of listed buildings within close vicinity of the Site. These include the Grade II* listed SOAS to the west, and the Grade II listed Woburn terraces to the north.

The surrounding area is characterised by a mix of uses, although the immediately surrounding buildings are generally in educational use and occupied by Higher Education Institutions, including UCL and the University of London.

Relevant Planning History

The Camden online planning register has been checked and there is extensive planning history relating to the Institute of Education. The relevant planning history is as follows:

On the 8 March 2013, planning permission (ref. 2017/7061/P) and listed building consent (ref. 2018/0257/L) was granted for the **“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.”**

Planning Policy Context

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 (2023), and Supplementary Planning Documents are a material consideration.

Camden also published the Local Plan Review (Regulation 18 consultation) on the 17 January 2023, however, given its stage in the process, the policies within this document hold limited weight.

Legislative Framework

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 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 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.

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.

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).

Proposal

The original hot food offering within 20 Bedford Way was provided via a kitchen on level 6 in a space adjacent to an open plan rest area known as the Lawton Room. The kitchen facility was closed down in 2020 due to compliance, fire, and health and safety risks associated with the current design and extract system. As a consequence, the hot food offering within the IoE has been affected by the closure of the kitchen facility as the relocated café on level 3 is only able to provide a very limited hot food offering (soup, jacket potatoes and toasted sandwiches) to a daily population in excess of 3,500 users.

It should be noted that if the kitchen was to be brought back into use, significant physical interventions (both internally and externally) to the listed building would be required in order to install a compliant extract system. As such there is no intention to bring the kitchen back into function, other than for it to be used as a preparation space to support a cold catering offering. If the kitchen were to be relocated, it would displace teaching space which is already in high demand, as evidenced by the works forming part of the phased masterplan which is currently being implemented.

In order to ensure a satisfactory food offering, meet the expectations of students and staff and provide an improved user experience, UCL would like to provide an external hot food offering on the building's forecourt. This would comprise a single kitchen unit (4.5m x 2.5m x 3.3m) which would be of a metal construction and two small serving units (3.05m x 1.83m x 2.06m) which would be of a timber construction, albeit would be decorated in a manner sympathetic to its immediate surroundings and consistent with UCL branding found across the wider campus.

In order to minimise the visual presence of the structures, these have been located to the edge of the forecourt, adjacent the rear wing, leaving the view to the rear entrance unobstructed.

No physical interventions to the forecourt would be required in order to accommodate the catering structures and they would not be fixed in any way, instead sitting on plinths. Electric outlets already exist on to this area, and these would be used to serve the catering units.

It is anticipated that the catering units would only be operational during the hours of 10.00am-5.00pm, on Monday and Fridays, although they would remain on the forecourt outside of these hours. Due to the nature of the courses available at the IoE, which run from October through to September, the catering units would be operational throughout the year.

The catering structures are sought on a temporary four-year basis. In the longer term UCL will be seeking a more permanent solution. This may include consideration for alternative location if this is feasible and will still meet the requirements of those seeking use of the catering facility.

Planning Assessment

Design and Heritage

Local Plan Policy D1 seeks to ensure development respects local context and character, preserves or enhances the historic environment and heritage assets, is of sustainable and durable construction and is adaptable to different activities and land uses and comprises details and materials that are of high quality and complement the local character.

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 general purpose of the proposal is to provide an appropriate food offering to students and staff. To assess the impact of the proposals on the significance of the listed building, and the Bloomsbury Conservation Area, a Heritage Assessment has been prepared by Gerald Eve, and is appended to this cover letter. In summary, the proposed catering structures would be small in scale and sympathetically located in order to ensure that they do not compete with, or detract from the listed building. Furthermore, as the structures would be freestanding and temporary, they would be entirely reversible additions. The development works are therefore limited in nature and will not have an adverse impact on the special architectural or historical significance of the building.

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 full accordance with the 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 proposed works would help to provide an enhanced experience for UCL students and staff, through the provision of improved ancillary facilities to support the educational use.

Delivery and Servicing

Policy T4 of the Local Plan promotes the sustainable movement of goods and materials and seek to minimise the movement of goods and materials by road

Given the small-scale food offering proposed, no changes are proposed to the existing delivery and servicing arrangements. The food required for the catering units is to be provided by existing food suppliers and any goods required for the catering units are expected to be consolidated with existing deliveries.

Amenity

Policy A1 seeks to ensure that standards of amenity are protected. Policy A4 seeks to ensure that noise is controlled and managed.

The building is an existing educational use and forms part of an enclave of educational buildings, with the nearest residential buildings located to the west on Woburn Square. The forecourt, which is a large, paved area with seating, is already a popular external amenity area for students and staff. Given the small-scale food offering proposed, and the fact that the area is already a well-used area forming part of the entrance to the building, it is not considered that the development would result in an increase in noise and disturbance to neighbouring properties.

Whilst it is acknowledged that it would be difficult to restrict customers to students and staff only, the catering structures are located discreetly to the rear of the university building, and in an area which is primarily surrounded by other university buildings. Given that there will be no active promotion of the food stalls, it is highly unlikely that the development will increase footfall over that which is currently experienced, so to result in any adverse impact on amenity.

It is also highlighted that there are a number of waste bins around the perimeter of the forecourt.

The proposed development would therefore comply with Policy A1 and A4 of the Local Plan.

Conclusion

In conclusion, the proposed development complies with relevant policies of the Camden Local Plan, namely Policies D1, D2. Furthermore, the works would accord with the Planning (Listed Buildings and Conservation Areas) Act 1990 and Section 16 of the NPPF.

The proposed works would not detract from the heritage asset and would not involve any adverse disturbance or interventions to the listed building which would undermine its significance. Given the small-scale nature of the works, they would also preserve the character and appearance of the wider Conservation Area. It is also highlighted that the works are sought on a temporary basis and are entirely reversible.

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

Application Documents

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



- Application Form, prepared by Gerald Eve;
- Cover Letter inc. heritage assessment, prepared by Gerald Eve;
- Site Location Plan, prepared by Architon; and
- Existing and Proposed Plans, Elevation and Sections prepared by Architon.

Should you have any queries, please contact Paige Ireland [REDACTED] We look forward to hearing from you shortly.

Yours faithfully,

Gerald Eve LLP

Gerald Eve LLP

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 provision of external catering structures at the Institute of Education ('IoE').
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 weighed 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, 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 relate to the provision of three temporary single storey structures to the building's forecourt. The forecourt is an expansive area, paved in modern materials adjacent to the rear entrance.
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 food provision is required in order to meet the needs of students and staff at the IoE as the existing provision is inadequate, and it is not possible to accommodate such facilities within the building without displacing much needed teaching space.
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 prepared by Architon. The works are as follows:
 - The installation of one freestanding metal kitchen hub unit for a temporary period of four years; and
 - The installation of two freestanding timber supporting serving units for a temporary period of four years.
18. The site comprises the paved forecourt to the rear of the IoE which is simple in its design and utilises modern materials. The area is expansive and is used as an informal seating area, with benches and waste bins located around the perimeter. The area is also enclosed by metal railing.
19. The development involves the installation of three single storey structures to the edge of the forecourt adjacent the rear wing. Given their scale relative to the listed building, they would not



compete with, or detract from the special architectural interest of the heritage asset. Furthermore, the catering structures would appear as distinctly modern additions.

20. Given their scale and location, the structures would not be readily apparent from surrounding viewpoints. Any views of the structures would largely be restricted to those from the adjacent university buildings.
21. As the structures are freestanding, no physical interventions would be required and as such there would be no loss of historic fabric. The works would therefore be easily reversible, and the structures removed after the end of the temporary period.
22. Given the small-scale nature of the works, they are considered to preserve the character and appearance of the Bloomsbury Conservation Area.
23. Overall, the proposed works would preserve the special architectural and historic significance of the listed building and the character and appearance the Bloomsbury Conservation Area. Any harm considered to arise from the proposals would be temporary as the works are easily reversible and are sought for a limited period.
24. The development is therefore 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.