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Planning and Development  
Camden Council  
Camden Town Hall  
London  
WC1H 8ND

Our ref: **LEO/SNE/PIR/BGI/U0019123**  
Your Ref: **PP-13223853**

**31 July 2024**

Dear Sir / Madam

**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, *Bloomsbury Heat & Power II Limited* ('the Applicant'), we write to submit an application for Full Planning Permission and Listed Building Consent for the installation of Air Source Heat Pumps (ASHP) on the roof of the Institute of Education ('IoE'), 20 Bedford Way, WC1H 0AL ('the Site').

Full Planning Permission is sought for:

"Upgrading of the existing Bloomsbury District Heat network through the installation of roof mounted air source heat pumps and supporting equipment within an acoustic enclosure, and associated external works."

Listed Building Consent is sought for:

'Upgrading of the existing Bloomsbury District Heat network through the installation of roof mounted air source heat pumps and supporting equipment within an acoustic enclosure, and associated external and internal works.'

#### **Site and Surroundings**

The Site is a Grade II\* listed brutalist building, comprising Nos. 17, 20 and 26 Bedford Way. The Site lies within the Bloomsbury Conservation Area and is located to the south-eastern edge of the UCL Bloomsbury Campus.

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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, and to the west by the Woburn Square terraces and the School of Oriental and African Studies (SOAS).

Within close vicinity of the Site are Russell Square and Woburn Square. Both squares are protected as designated open spaces, whilst Russell Square is also a Grade II listed Registered and Garden.

The building was designed by renowned twentieth-century architect Sir Denys Lasdun, and it houses the Institute of Education, the Institute of Advanced Legal Studies, as well as other functions of UCL.

The surrounding area is characterised by a mix of uses including retail, residential, hotel and office. The Site also has the highest PTAL rating of 6b as it is within walking distance of Russell Square Underground Station and is served by multiple bus routes.

#### **Background and Design Evolution**

The Bloomsbury Heat and Power Consortium (BHPC) comprising the University of London (UoL), School of Oriental and African Studies (SOAS) and University College London (UCL) was formalised in 1996 to oversee the development of heat and power infrastructure across the southern half of the Bloomsbury campus.

The buildings within the southern campus are currently supplied by a district heating network that consists of gas Combined Heat Power (CHP) engines more than 20 years old, gas and oil-fired boilers more than 50 years old, and distribution pipework, some of which is over 80 years old. The equipment is therefore life expired and not energy efficient. As such the Consortium aspire to upgrade and to significantly decarbonise the Universities' heating network, with the eventual aim of complete decarbonisation of the network within the next decade.

In order to aid the development of the proposals, engagement with various stakeholders has taken place. Initial discussions with Camden on the upgrading of the DHN commenced in 2022, where initial proposals to locate the Air Source Heat Pumps (ASHP) on the roof of the Grade II\* listed Institute of Education were presented to officers. Further to the initial meeting, a site visit took place with officers where a mock up of the plant screen was displayed on Site. At this stage, officers raised concerns with regards to the visibility of the plant from Bedford Way.

In April 2023 a further pre-application meeting took place to discuss the evolving proposals. Whilst officers were supportive of the ultimate aim of the project, recognising the significant environmental benefits that could be secured, they questioned why the roof of the Institute of Education became the preferred location for the ASHP. They therefore requested further information on which alternatives had been considered prior to reaching the decision that the IoE was the most appropriate option

A detailed report was subsequently prepared by Ramboll, identifying other buildings within the Bloomsbury Campus which were initially considered for the proposal but were subsequently discounted for multiple reasons, including issues of ownership, operation, planning, structural loading and heritage status. A summary of the alternatives report, prepared by Gerald Eve LLP, was sent to Camden. This summary note has been included as part of this application submission.

Once the roof of the IoE was established as the only feasible option for the location of the ASHP, the detailed design process started, whereby AHMM were appointed to develop proposals to minimise the visual impact of the proposed plant equipment and enclosures and ensure that the special architectural interest of the

building was not undermined. Alan Baxter Associates were similarly appointed to provide heritage and townscape input.

Design options were presented to Camden in two subsequent pre-application meetings. These options included a wide range of approaches including those to celebrate and exaggerate the appearance of the plant enclosures as well as extending these across all of the available roof areas. However, a preferred option was identified during the meetings, which was the least intrusive visually. This was subject to further design amendments following officer feedback and now forms the proposal put forward for consideration.

Pre-application engagement has also taken place with Twentieth Century Society and Historic England. Further details of the engagement can be found in the Design and Access Statement prepared by AHMM.

### **Proposals**

As noted above, the existing Bloomsbury District Heat network is served by 20-year-old gas CHP engines, 50-year-old gas and oil-fired boilers and distribution pipework, some of which is over 80 years old.

The existing system is therefore not energy efficient, and the equipment is reaching end of life, as such the Consortium would like to:

- Update, enhance and extend the network to become a highly flexible and efficient low carbon network capable of delivering significant carbon savings through the optimisation of the system performance; and
- To significantly decarbonise the heat supplied by the network, with the eventual aim of complete decarbonisation within the next decade, enabling the Consortium members to meet their Net Zero Carbon Targets.

Central to achieving the above aims is the use of ASHPs to operate as the primary low carbon heat source required to supply to the District Heat Network. Following a detailed study into the availability of space across the southern part of the Bloomsbury campus, as discussed in the preceding section, it was resolved that the only feasible option to accommodate the required number of ASHP to support the network was on the roof of the IoE Building.

The works to the roof of the IoE therefore comprise the installation of 16 ASHP, four compressors, a transformer room and a switch room, which are proposed to be distributed across the two central roof planes of the building. In order to support the plant, primary beams are proposed spanning between the central and perimeter columns on the floorplates below. They will be supported off concrete pedestals above each column location at 4.8m centres.

New pipework and cables associated with the new roof plant are proposed to run inside the new plant enclosure and will perforate the side of the adjacent cores where they will descend via existing risers to the plantroom on Level 1 of the existing building. Perforations will be limited in size and number to minimise any impact on the historic fabric.

In order to limit the visual impact of the new plant, the equipment is proposed to be contained and concealed within an approximate 3m high acoustic enclosure. The colour and materiality of the enclosure has been influenced by the finishes of the existing building, namely the aluminium curtain walling, and louvres and inflected 'knock out' panels of painted steel, which although now weathered, originally had a bronze anodised

finish. The enclosure therefore comprises a louvred screen in a colour to match the original anodised finish of the existing curtain walling.

Although this will need to be subject to further investigation, the works also look at replacing the existing roof build up. However, as the need for the replacement has not yet been confirmed, this element of the proposal will be discussed further with officers during the determination period. It is assumed that should a condition survey conclude that the roof requires replacement, further details of this can be secured by condition.

It should be highlighted that whilst the Bloomsbury District Heat network is primarily to be supplied heat through the ASHP located on the IoE roof, wider works are proposed in order to fully upgrade the network. However, this application looks solely at the works to the IoE and any wider works which require planning permission or listed building consent will be subject to further applications.

Once all works have been implemented, there would be a phased connection of the properties within the Bloomsbury south campus to enable them to benefit from the low carbon heating, primarily supplied through the new plant equipment to the IoE. Full details of the phasing can be found in the Design and Access Statement prepared by AHMM. However, it is anticipated that, subject to approval, heat on in most properties already connected to the network would be completed in 2025, with heat on to new connections in properties currently unconnected to the network, completed by 2028.

The proposed works would therefore secure significant carbon savings and deliver significant environmental benefits.

#### **Planning Policy Context**

Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that applications for development are to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

As the proposals relate to a listed building within a conservation area, consideration has been given to the Planning (Listed Buildings and Conservation Areas) Act 1990 ('LBCA Act'), which places a duty upon the local planning authority to determine applications affecting listed buildings and pay special regard to the desirability of preserving the building or its setting.

The LBCA Act sets out that in considering whether to grant listed building consent for any works, the local planning authority "*shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*"

For the purposes of the proposed development the adopted Development Plan comprises:

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

In terms of emerging policy Camden are currently in the process of reviewing the Local Plan. The updated Local Plan is currently in the early stage of development and Camden consulted on the draft Local Plan (Regulation 18 consultation) between the 17 January to 13 March 2024. The fully reviewed new Local Plan is expected to be adopted in the summer of 2026. Therefore, at this stage, in line with paragraph 48 of the NPPF, limited weight should be applied to policies within the draft Local Plan. They have therefore not been considered in detail in this letter.

The National Planning Policy Framework ('NPPF'), amended in December 2023, is also a material consideration. This sets out the Government's economic, environmental and social planning policies for England, summarising all previous national planning policy advice in a single document.

Section 16 of the NPPF requires great weight to be placed on the preservation of designated heritage assets. It sets out that the policy basis for assessing development affecting heritage assets, in line with statute and case law on listed buildings and conservation area. It states that in determining applications that result in any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

### **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 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 presenting the building or its setting or 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 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 the conservation area.

### **Key Planning Considerations**

#### Design – Policy

London Plan Policy D4 sets out how the design of development proposals should be thoroughly scrutinised by borough planning, urban design and conservation officers and sets out a series of processes and actions to ensure development delivers good design.

Camden 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; is adaptable to different activities and land uses; comprises details and materials that are of high quality and complement the local character; and is inclusive and accessible for all. It goes on to state that the Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area.

#### Design – Assessment

The proposal relates to the installation of plant and an associated acoustic enclosure to the rooftops between Cores A and C of the Grade II\* building.

The Proposed Development has evolved during an extensive period of pre-application discussion and the submission of this Application follows detailed consultation with Camden Officers, 20<sup>th</sup> Century Society, Historic England, and other stakeholders.

As noted in the background section of this report, various design options were explored, however the chosen option seeks to restrict the extent of the enclosure to two of the available roof areas. Whilst noting that it is not possible to fully conceal the enclosure from viewpoints, the scheme is minimally visible from key locations to the north, east and south and is considered to be of a sufficiently high quality to respond to views from the west.

The acoustic screen itself proposed to be of a louvred design in a bronze colour, and this has been directly influenced by the bronze anodised aluminium curtain walling which typifies most of the external elevations, as well as the louvres and inflected 'knock out' panels of painted steel which infill the openings associated with the concrete cores. The enclosure has therefore been carefully designed and detailed to match the style, dimension and colour of the original building.

Furthermore, the screen has been carefully designed in order to maintain a subordinate and appropriate relationship to the building's iconic concrete forms. Along Bedford Way, the curtain walling of the upper-most floor is set away from the concrete giving these elements space to enhance their sculptural form. At roof level the proposed plant enclosure does the same, being set away to allow the sculptural form of the cores to remain dominant.

The proposed development is of a high-quality design which respects existing context and character. It therefore complies with Policy D4 of the London Plan and Policy D1 of the Local Plan.

#### Heritage – Policy

London Plan Policy HC1 relates to heritage conservation and growth. Part C of Policy HC1 states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Policy D2 of the Camden Local Plan seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

The policy states that the Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Additionally, the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Policy D2 of the Local Plan states that the Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.

Policy D2 of the Local Plan states that the Council will resist proposals for alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building and resist development that would cause harm to the significance of a listed building through an effect on its setting.

#### Heritage – Assessment

A Heritage and Townscape and Visual Impact Assessment has been prepared by Alan Baxter Associates and is submitted as part of this application. The report provides an assessment of the impact of the proposals on the significance of the Grade II\* listed building and other built heritage assets in vicinity of the site. It also provides an assessment of the impact of the proposed development upon the surrounding townscape context, including an assessment of seven verified views which were agreed with Camden officer during the pre-application stage.

In relation to the impact of the proposal on the significance of the building, the report concludes that through skilful architectural design, which responds to the individual language and form of each elevation, harm has been carefully mitigated. It states that the position is further supported through the substantial environmental benefits of the scheme. Overall, the proposal is considered a neutral impact on the wider architectural and historical interest of the building.

When taking consideration of the townscape impacts, the supporting HTVIA concludes that the proposal has a neutral impact on the townscape relating to minimal visibility, and a subtle and appropriate design. In relation to the Bloomsbury Conservation Area, the report concludes that the proposed development would preserve the character and appearance of the Conservation Area by respecting the character, scale and dominating form of the building, through its high-quality design. It would also have minimal impact on views within the Conservation Area.

The conclusions set out by the supporting HTVIA are deemed a fair reflection of other views obtained by other key stakeholders, principally the 20<sup>th</sup> Century Society and Historic England, who raised no concerns to the proposals put forward.

In conclusion, the proposals have been appropriately designed to mitigate harm to the significance of the listed building, and to also preserve the character and appearance of the conservation area. The proposed development would therefore comply with the relevant legislation and planning policies.

#### Sustainable Infrastructure –Policy

Part C of Policy SI 3 of the London Plan relates to energy infrastructure and sets out that Development Plans should identify opportunities for expanding and inter-connecting existing networks as well as establishing new connections. Part E heat networks should achieve good practice design and specification standards for primary, secondary and tertiary systems.

Policy CC1 of the Local Plan requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards. The Policy promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy. The Policy also supports and encourages sensitive energy efficiency improvements to existing buildings.

In relation to decentralised energy networks, the policy states that the Council will promote decentralised energy by working with local organisations and developers to implement them in the parts of Camden most likely to support them. It also states that existing decentralised energy networks, including that in Bloomsbury will be protected.

#### Sustainable Infrastructure – Assessment

The proposals will allow for the upgrade and expansion of an extremely outdated heat network to deliver significant carbon savings.

A carbon savings note has been prepared by Arcadis, which provides an estimate of the expected carbon savings arising from the network upgrade when assessed against the Green Book Guidance. The estimate indicates an 80% reduction in CO2 emissions up to year 5 and up to 95% up to year 40.

It is acknowledged that policy typically requires carbon reductions to be assessed against Part L of the Building Regulations 2021, however, in this instance the Green Book is considered to be a more accurate way of understanding the savings. This is due to the greater accuracy of the green book figures and their forecasting into the long term. Furthermore, SAP10.2/Part L also uses a fixed, lower, carbon figure and therefore fails to realise long term carbon content of electricity forecasts.

In addition, whilst the proposal looks at decarbonising the buildings in the southern portion of the Bloomsbury Campus, there is opportunity in extending the system in the future towards the northern campus area should suitable connections be made available.

Therefore, the proposals will promote significant carbon savings across a wide proportion of the Bloomsbury Campus, thereby delivering significant environmental benefits. In addition, the proposals support the upgrade and expansion of an existing heat network which will increase the associated benefits across the Bloomsbury Campus. The proposed development therefore complies with Policy SI 3 of the London Plan and CC1 of the Local Plan.

#### Amenity – Planning Policy Context

Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The Council will grant permission for development unless this causes unacceptable harm to amenity. The relevant factors the Policy considers are outlook, noise and vibration levels and odour, fumes and dust.

Within the sub-text of Policy A1, in paragraph 6.20, it states that when development that is likely to generate noise is proposed, the Council will require an acoustic report to accompany the application.

Policy A4 of the Local Plan seeks to ensure that noise and vibration is controlled and managed. It states that development should have regard to Camden's Noise and Vibration Thresholds. Planning permission will not be granted where the development is likely to generate unacceptable noise and vibration impacts. It then states that planning permission for noise generating development, including any plant or machinery, will only be granted if it can be operated without causing harm to amenity.

#### Amenity – Assessment

A Noise Assessment has been prepared by Buro Happold and submitted in support of this application.

This report concludes that subject to the plant equipment being enclosed by a 3m high acoustic barrier, the proposed plant equipment would comply with the recommended plant noise targets outlined in the Amenity CPG. The proposed development includes the installation of an acoustic barrier meeting the requirements set out in the report and therefore mitigates against any noise impacts to nearby sensitive receptors.



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

#### Education – Planning Policy Context

Policy C2 of the Local Plan states that the Council will work with its partners to ensure that community facilities and services are developed and modernised to meet the changing needs of our community and reflect new approaches to the delivery of services. Part E of the Policy states that the Council will support the investment plans of educational research bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK.

#### Education – Assessment

The proposals would modernise the existing District Heat Network to improve the function of the buildings comprising the southern portion of the Bloomsbury Campus. Not only would the proposal deliver significant carbon savings, but it would also have the benefit of significantly reducing fuel costs, which in turn could be invested in other aspects of the university's operations, to ensure they can continue to deliver significant social and economic benefits for Camden, London and the UK.

The proposals are therefore in accordance with Policy C2 of the Local Plan.

#### **Summary**

The proposals seek to promote the update, and future expansion, of the existing heat network, through the provision of ASHP on the roof of the IoE Building. The proposals will promote significant carbon saving benefits across the Bloomsbury Campus.

The Proposed Development has evolved during an extensive period of pre-application discussion and the submission of this Application follows detailed consultation with Camden Officers, 20<sup>th</sup> Century Society, Historic England, and other stakeholders.

Through the design process, careful consideration has been given to the listed building, and conservation in which the proposal is located. Through promoting a considered, high quality design, it is concluded that any harm to the listed building has been mitigated, and the proposal will preserve the character and appearance of the conservation area.

In conclusion, the proposed development complies with the statutory tests, and Development Plan, and delivers significant environmental benefits. Therefore, planning permission and listed building consent should be granted without delay.

#### **Application Documentation**

In accordance with the requirements of the London Borough of Camden and as agreed with Officers, the application comprises the following documents:

- Application Form and CIL form, prepared by Gerald Eve;
- Covering Letter, prepared by Gerald Eve LLP;
- Design, Access and Heritage Statement, AHMM;

- Existing and Proposed Drawings, prepared by AHMM;
- Design overview and carbon savings note, prepared by Arcadis
- Noise Impact Assessment, prepared by Buro Happold
- Townscape and Heritage Assessment, prepared by Alan Baxter Associates; and
- Alternatives summary note, prepared by Gerald Eve.

The planning application fee has been paid online through the Planning Portal.

We trust that the information submitted is sufficient to validate the application. Should you require anything further please contact Paige Ireland (████████████████████) or Ben Gibbs (████████████████████) of this office.

Yours faithfully,

*Gerald Eve LLP*

**Gerald Eve LLP**  
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