



Institute of Education, 20 Bedford Way
Planning Statement

August 2024

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1. Introduction

Introduction

- 1.1. On behalf of our Client, University College London ('UCL'), this planning statement has been prepared in support of a full planning and listed building consent application for reconfiguration, extension and refurbishment works at the Institute of Education ('IoE'), 20 Bedford Way, WC1H 0AL. The application is seeking planning and listed building consent for:

Full Planning Permission

“External works to the Institute of Education, 20 Bedford Way comprising a new extended entrance at Bedford Way; a reconfigured entrance at Thornhaugh Mews; alterations to roof plant enclosure and new chiller unit; repairs and installation of insulation to external Levels 6-9 terraces; installation of secondary glazing to selected panels; new louvres at Level 8 wing A; smoke ventilation panels along Bedford Way elevation; refurbishment and repairs to Level 4 and 10 roof; new external gate at Level 5 wing A; replacement rooflights at Level 4; external beacons at Level 6 and 10 roof; and other associated works.”

Listed Building Consent

“Internal and external works to the Institute of Education, 20 Bedford Way. Internal works comprising reconfiguration and refurbishment of Levels 5-9 Core A nib and wing, Level 6 wing A Lawton Room, Level 1 plantroom, Level 4 Room 426, Level 5 Zone C and Levels 1, 3 and 4 foyers; replacement mezzanine levels to selected rooms at Levels 2 and 3 in Core C and Levels 4 and 5; creation of new plant room at Level 8 wing A; new post room to Level 4; installation of platform lifts at Level 3 and 4 foyers; installation of fixed furniture and security gates in foyers; replacement of doors to the IALs building at Levels 4-9; infill of Level 1 drama hall window; replacement of existing halls signage with new digital signage at Levels 1-9 Cores A and B, Level 3 and 4 Zone B and Level 5 Zone C; and other associated internal works. External works comprising a new extended entrance at Bedford Way; a reconfigured entrance at Thornhaugh Mews; alterations to roof plant enclosure and new chiller unit; repairs and installation of insulation to external Levels 6-9 terraces; installation of secondary glazing to selected panels; new louvres at Level 8 wing A; smoke ventilation panels along Bedford Way elevation; refurbishment and repairs to Level 4 and 10 roof; new external gate at Level 5 wing A; replacement rooflights at Level 4; external beacons at Level 6 and 10 roof; and other associated external works.”

- 1.2. The proposals are for the full second phase of the IoE Masterplan which UCL has developed since acquiring the building from the University of London ('UoL') and implementing Phase 1. More detail on the Masterplan is set out in the next section.
- 1.3. The Site benefits from the following Phase 2 extant permissions:

Phase	Application ref.	Approved	Status
Phase 2A	2019/6410/L and 2019/6386/P	02/03/2020	Implemented
Phase 2B	2020/1567/L and 2020/1520/P	15/06/2020	Implemented
Phase 2C	2021/6235/P and 2021/6242/L	22/12/2021	Implemented
Phase 2D	2023/0291/L	07/03/2023	Implemented

- 1.4. The above applications will be referred to as the “Phased Permissions” in this Planning Statement. In discussion with the planning officer and conservation officer, a strategy to formalise a small number of design amendments to the Phased Permissions has been agreed in light of the complexity of the multiple phased planning and listed building consents previously approved. It has been agreed that a new planning and listed building consent application be submitted encompassing all sub-phases with the design amendments incorporated.

The Applicant – University College London

- 1.5. UCL is London’s leading multidisciplinary university, with over 16,000 staff and 51,000 students. UCL provides excellence and leadership in teaching and research. It is ranked ninth in the QS World University Rankings 2024 and is a top 10 UK university ranked 6th by The Times and 8th by The Guardian.

IoE Phased Masterplan Approach

- 1.6. 20 Bedford Way, designed by Lasdun, comprises a large building of circa 27,000 sqm of F1(a) (higher education) and associated ancillary floorspace and is Grade II* listed.
- 1.7. UCL merged with the Institute of Education in 2014. This merger provided the opportunity for UCL to continue delivering the aims of its masterplan across the wider Bloomsbury Estate.
- 1.8. The building was in a poor state of repair and underutilised. The building also contains legacies of projects implemented ad-hoc at specific times to address specific issues, and there has been a clear lack of site wide visioning and a holistic approach.
- 1.9. Therefore, UCL implemented a phased masterplan for the building. This holistic approach to the building allowed UCL and their design team to identify areas in need of refurbishment in the short, medium and long term and opportunities for improvements to the building, its functionality, efficiency and use of space.
- 1.10. There was a need to approach the master-planning process practically, recognising that the existing building provides a significant quantum of teaching and learning floorspace currently in use. This floorspace could not be absorbed within the wider Bloomsbury Estate should the entire building be closed for site-wide refurbishment. Furthermore, UCL has significant pressure on its F1(a) floorspace already due to a number of other refurbishment projects on its Bloomsbury Campus. This phased approach also limited the impact and disruption to the existing student experience and provision of teaching and learning facilities, where existing provision is already under considerable pressure.
- 1.11. Consequently, to limit disruption to the existing F1(a) provision and pressure on already encumbered F1(a) floorspace elsewhere on Campus, UCL took a phased approach to the implementation of the master planning works at 20 Bedford Way. This was done in order to streamline the programme of works and minimise disruption to students and staff working and studying within the building.
- 1.12. Phase 1 of the Masterplan has already been implemented and has been successful. This phase sought to modernise the building, improve accessibility, improve student experience and bring forward more F1(a) floorspace.
- 1.13. Phase 2A (ref. 2019/6410/L and 2019/6386/P) of the Masterplan was approved on 2 March 2020 and focused on infrastructure replacements, sanitary upgrade and enabling works which allowed the Phase 2B works to come forward.
- 1.14. Phase 2B (ref. 2020/1567/L and 2020/1520/P) of the Masterplan was approved on 15 June 2020 and focused on repairs and insulation to the external terraces and the roof, the creation of a new plant room and the reconfiguration and refurbishment at Levels 5-9 in the nib and wing connected to Core A as well as the Lawton Room at Level 6 adjoining Wing A.
- 1.15. Phase 2C (ref. 2021/6235/P and 2021/6242/L) of the Masterplan was approved on 2 March 2022 and focused on upgrading the entrances to the IoE as well as the refurbishment and reconfiguration of the foyer areas at Levels 1, 3 and 4 and entrance areas at Levels 3 and 4.
- 1.16. Phase 2D came forward in 2 parts. First, Level 5 (ref. 2022/1037/L) of the Masterplan was approved on 24 March 2022 and focused on the refurbishment Level 5 of Zone C. The second part of Phase 2D was for the refurbishment and reconfiguration of Level 9 in Zone C of the IoE (ref. 2022/1846/L) and was approved on 10 May 2022. It was subsequently decided to not go ahead with the Level 9 works and to revise the proposed works for Level 5. A further revised application for Level 5 (ref. 2023/0291/L) was approved on 7 March 2023 and supersedes the previous application.
- 1.17. The Phased Permissions have been implemented. During construction works, amends were made to the final design to accommodate on-site discoveries and design changes as the detailed design developed.

Phase 2 Application Approach

- 1.18. Over the last five years, UCL has taken a phased approach to implementing the Phase 2 masterplanning works at 20 Bedford Way. As works have progressed on the Phased Permissions, a number of design amendments have arisen. This application incorporates unchanged elements of the scheme approved pursuant to the Phased Permissions and a small number of updated proposals that have been subject to amendments.
- 1.19. This full planning and listed building consent application seeks to formalise the design amendments in an all-encompassing application. It also considers any policy and legislative requirements that have changed since the Phased

Permissions were granted, namely the adopted Local Plan policies remain unchanged but the National Planning Policy Framework has been updated.

- 1.20. The design changes have been discussed with the Conservation Officer on two site visits and it was subsequently agreed that following the completion of construction works, a new application covering the Phase 2 works and including the design amendments should be submitted. This is to streamline the process and to enable an assessment of the overall impact of the works on the building, as opposed to formalising the changes through a number of Section 19 and Section 96a applications for each sub-phase. This strategy avoids seven separate applications being submitted and enables the cumulative impact of the amendments to be assessed in the context of the overall scheme.
- 1.21. This all-encompassing application includes the approved and implemented works from each sub-phase, along with the design amendments incorporated. These all-encompassing works are referred to as the “Proposed Development” in this Planning Statement which sets out a justification for and assessment of the proposals against the relevant planning policies.

Approved works

- 1.22. The Phase 2A-2D permissions have been implemented over the past five years. There are limited differences between the implemented Phased Permissions and this Proposed Development. The core proposals are consistent with the approved permissions. The differences between the Phased Permissions and the Proposed Development are limited to a small number of design amendments which are set out within this application. In summary the changes are:
- Movement of wall by 200mm to align with existing slab to incorporate fire compliant doors at Level 1 Core A;
 - Revised café layout at Level 3;
 - Level 3 pavillion panel projection of 65mm;
 - Boarding over concrete walls in poor condition in Level 3 teaching rooms;
 - Revised layout of Level 3 teaching room;
 - Increased depth of opening ventilation at Level 3;
 - Formation of new post room to Level 4;
 - Rm 426 library – creation of new opening and replacement of existing entrance door;
 - Minor changes to Level 5 Zone C layout;
 - Revised wing terrace and refuse strategy on Levels 6-8;
 - Changes to the location of riser openings for services at Levels 7, 8 and 9;
 - Reconfiguration of office layouts on Level 9 Zone A;
 - Core A and B riser openings made smaller or changed locations;
 - Drama hall window infill; and,
 - Installation of digital signage and removal of existing halls signage in cores.
- 1.23. In respect of the part of the development permitted by the Phased Permissions that is replicated in this application, works will continue to be carried out fully in accordance with the Phased Permissions, other than where stated in this application that there is a design change.

Application Documents

- 1.24. This application comprises documentation which examines the planning and technical matters relevant to the consideration of the application. Accordingly, this Planning Statement should be read in conjunction with the documents outlined below.
- 1.25. As this application is a resubmission of proposals consented under the Phased Permissions, save that this application incorporates a number of specific design amendments, the supporting documents are set out as updates/addenda to the documents submitted as part of the original planning applications.
- 1.26. Where an addendum has been produced, the addendum qualifies that the existing assessment remains robust and undertakes any additional assessment required to cover the specific requirements of the design amendments. This approach has been agreed with Camden Council on 7 March 2024.

Title	Prepared By	Format of submission
Application Form	Deloitte LLP	New form submitted
Design and Access Statement	Architon	Addendum confirming changes, original statements appended.

Site Location Plan	Architon	Site location plan remains as previous applications.
Site Plan	Architon	Site plan remains as previous applications.
Drawings – Existing	Architon	As existing drawings remain as prior to the implementation of the approved Phased Permissions.
Drawings – Proposed	Architon	Proposed drawings provided with bubbles and annotations highlighting amendments to the scheme from the approved Phased Permissions.
Drawings – As-built	Architon	As-built plan drawings provided as clean versions of proposed plan drawings for the purpose of final approved drawings. These provide the same information as the proposed plan drawings but do not include bubbles and annotations to distinguish the amendments.
Heritage Statement	Alan Baxter Limited	Addendum submitted assessing changes and cumulative impact of all works. Original statements appended.
M&E Drawings	L&P Group	Note confirming changes from the original submission. Updated drawing pack submitted.
M&E Scope of Works	L&P Group	Revision 2 submitted.
Noise Assessment	Buro Happold	Note confirming continued compliance with acoustic performance requirements. Stage 4 Acoustics Report appended.
Planning Statement	Deloitte LLP	New statement assessing cumulative impact of amendments against up to date policies.
Schedule of Works	Architon LLP	Addendum confirming changes, original schedule of works appended. Drawing changes tracker appended.
Structural Statement	TAK Structures	Addendum assessing design amendments. Original statements appended.
Sustainability Statement	Buro Happold	Compliance note confirming no changes required to sustainability statement submitted. Original statements appended.
Conditions Documents		
Light fittings details - Drawings	L&P Group	As approved
Luminaire Schedule	L&P Group	As approved
Concrete repair sample, methodology and data sheets	Overbury	As approved
Plaster removal sample and methodology	Prostrip Demolition Services	As approved

Planning Statement Structure

1.27. The statement comprises the following chapters:

- Chapter 2: The Site Context and Planning History;
- Chapter 3: The Proposals;
- Chapter 4: Pre-application Discussions
- Chapter 5: The Development Plan;
- Chapter 6: Policy Assessment;
- Chapter 7: Benefits of the Proposals; and,
- Chapter 8: Conclusion.

2. The Site Context and Planning History

Site Location and Description

- 2.1. The Site is located in the London Borough of Camden ('LBC'). It is located within Bloomsbury and on the south eastern edge of the UCL Bloomsbury Campus.
- 2.2. 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), another Lasdun designed building.
- 2.3. 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 listed and listed on the Register of Historic Parks and Gardens.
- 2.4. The area is well served by public transport, with London Underground stations Russell Square Station served by the Piccadilly line a 4 minute walk (0.2 miles) and Euston Square served by the Circle, District and Hammersmith and City Lines, a 10 minute walk (0.5 miles) from the building. The site is also in easy access of a number of bus stops along Woburn place and Russell Square and the major hubs of Euston and Kings Cross St Pancras Stations.
- 2.5. The site comprises part of the Grade II* listed IoE Building. The building was designed by Architect Sir Denys Lasdun and Partners and completed in 1977. It was listed in December 2000 (listing reference 1246932).
- 2.6. An extract of the listing description is included below:

"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... 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... 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...."

INTERIORS. The interiors are simple, but the quality of concrete finishes is exemplary throughout. The upper teaching spaces were designed to be flexible, and continue to be altered regularly - a tribute to the success of the original concept. The areas of special interest are the lift lobbies, where Lasdun's finishes can be seen at their best, and the entrance hall and principal stair to the lecture theatre."

- 2.7. The building occupies the full east length of the city block and is split into three separate addresses. No. 26 Bedford Way in the northern most part of the building is occupied by UCL Centre for Languages & International Education as well as the Division of Psychology and Language Sciences. The southernmost part of the building, 17 Russell Square, is occupied by the Institute of Advanced Legal Studies. This application relates to the central part of the building, No. 20 Bedford Way.
- 2.8. The main elevation fronts Bedford Way. However, there are both front and rear entrances to the building which are both in full use and accessed via Bedford Way and Woburn Square.
- 2.9. The building comprises an imposing glazed and concrete façade with five distinct core towers and a projecting wing to the rear of Core tower A. It contains nine levels, three below ground and six above.
- 2.10. This planning and listed building consent application relates to 20 Bedford Way only, and specifically the entrances on Bedford Way and Thornhaugh Mews, cores A, B and C, and selected areas between these cores, in the Wing and nib, the roofs and terraces, and the internal foyer area. Please refer to the site plan and Design and Access Statement.

- 2.11. The surrounding area is characterised by a mix of uses typical of the Central Activities Zone location, with the Royal National Hotel directly opposite on Bedford Way, ground floor retail and restaurant uses, residential, student residential and office uses in the surrounding area. The immediate surrounding buildings are generally in F1(a) use and occupied by Higher Education providers, including UCL, UoL and SOAS.
- 2.12. The building styles within the surrounding area are varied. The immediate area is characterised by a mix of Georgian terraces typical of the Bloomsbury Conservation Area and neighbouring garden squares, as well as large scale institutional buildings of twentieth century character.

Planning History

- 2.13. Relevant planning history has been set out in Appendix A. It demonstrates that the site has an extensive planning history including various applications for internal alterations. It also includes the applications for Phase 1 and sub-phases of Phase 2 of the Masterplan.
- 2.14. Phase 1 has been fully implemented and has set the design approach for the rest of the building.. It has delivered thermal upgrades, new teaching and studying spaces at Levels 2-4 of the wing adjoining Core A, a new student union bar at Level 2, and new workspace for staff at Levels 2, 4 and 5 in the wing adjoining Core A.
- 2.15. Proposals for Phase 2 have followed the design principles established in Phase 1:
- Phase 2A related to enabling works and comprised of upgrade works to services mostly concentrated within the 3 cores of the building.
 - Phase 2B enabled the creation of new teaching and workspaces for staff and students at Levels 5-9 in the wings and nibs connected to Core A as well as the Lawton Room at Level 6 adjoining Wing A.
 - Phase 2C proposed upgrades to the entrances on Bedford Way and Thornhaugh Mews as well as the reconfiguration and refurbishment of the foyer areas at Level 1, 2 and 4.
 - Phase 2D focused on restoring Level 5 Zone C closer to Lasdun's original design intent whilst providing floorspace that meets the modern standards and expectations for staff and students.
- 2.16. The Phased Permissions have been implemented and the following conditions were discharged against the Phase 2B and 2C permissions in 2022 and 2023:
- Phase 2B Condition 4 – Plant external noise levels (approved under application ref. 2022/4077/P)
 - Phase 2B Condition 5 Part A – Details of light fittings (approved under application ref. 2023/0099/L)
 - Phase 2B Condition 5 Part B – Sample panels of concrete cleaning and repair (approved under application ref. 2023/1732/L)
 - Phase 2C Condition 6a – Sample panel – plaster finish removal method (approved under application ref. 2022/1998/L)
 - Phase 2C Condition 6b – Sample panel – concrete repair – this condition has not been discharged. However, as it is requesting the same details as Condition 5 Part B for Phase 2B, under the new application we would suggest this is covered under that condition.
- 2.17. The above conditions relating to details and methodologies will not require the submission of further information. An addendum to the noise assessment approved through the plant noise condition accompanies this application and confirms there are no changes to the conclusions (please refer to Paragraph 6.74 of this statement). It is proposed that these conditions, if attached to the new permission, shall be worded as compliance conditions only, referring to the relevant approved documents. The design amendments do not result in any changes to the details approved through these conditions.
- 2.18. Accordingly, Appendix B of this Planning Statement sets out proposed amendments to the wording of these conditions of the Phased Permissions to reflect the status of the information which has been approved.
- 2.19. This full planning and listed building consent application incorporates the approved works for Phase 2A, 2B, 2C and 2D, along with a small number of design amendments. The design amendments are very minor and are required following design development and on-site discoveries as work has progressed. They do not amend the principle design intent approved through the Phased Permissions.

3. The Proposals

Description of Development

3.1. This application is seeking planning and listed building consent for:

Full Planning Permission

“External works to the Institute of Education, 20 Bedford Way comprising a new extended entrance at Bedford Way; a reconfigured entrance at Thornhaugh Mews; alterations to roof plant enclosure and new chiller unit; repairs and installation of insulation to external Levels 6-9 terraces; installation of secondary glazing to selected panels; new louvres at Level 8 wing A; smoke ventilation panels along Bedford Way elevation; refurbishment and repairs to Level 4 and 10 roof; new external gate at Level 5 wing A; replacement rooflights at Level 4; external beacons at Level 6 and 10 roof; and other associated works.”

Listed Building Consent

“Internal and external works to the Institute of Education, 20 Bedford Way. Internal works comprising reconfiguration and refurbishment of Levels 5-9 Core A nib and wing, Level 6 wing A Lawton Room, Level 1 plantroom, Level 4 Room 426, Level 5 Zone C and Levels 1, 3 and 4 foyers; replacement mezzanine levels to selected rooms at Levels 2 and 3 in Core C and Levels 4 and 5; creation of new plant room at Level 8 wing A; new post room to Level 4; installation of platform lifts at Level 3 and 4 foyers; installation of fixed furniture and security gates in foyers; replacement of doors to the IALs building at Levels 4-9; infill of Level 1 drama hall window; replacement of existing halls signage with new digital signage at Levels 1-9 Cores A and B, Level 3 and 4 Zone B and Level 5 Zone C; and other associated internal works. External works comprising a new extended entrance at Bedford Way; a reconfigured entrance at Thornhaugh Mews; alterations to roof plant enclosure and new chiller unit; repairs and installation of insulation to external Levels 6-9 terraces; installation of secondary glazing to selected panels; new louvres at Level 8 wing A; smoke ventilation panels along Bedford Way elevation; refurbishment and repairs to Level 4 and 10 roof; new external gate at Level 5 wing A; replacement rooflights at Level 4; external beacons at Level 6 and 10 roof; and other associated external works.”

3.2. These proposals related to Cores A, B and C of the building, Level 1 plant room, selected mezzanine floors at levels 4 and 5, Levels 5-9 in the ‘nib’ and ‘wing’ connected to Core A, the Lawton Room at Level 6, external terraces connected to these areas, the lobby roof of Level 4, the roof at Level 10, the entrances at Bedford Way and Thornhaugh Mews, the main foyer and entrance areas at Levels 3 and 4, the foyer area at level 1, Level 5 Zone C and minor works elsewhere.

Design amendments

3.3. The below is a schedule of the main design amendments from the approved works. These are considered to be very minor in nature. Please refer to the submitted proposed drawings and Schedule of Works for a comprehensive detail of the specific changes. As requested by the planning and conservation officers at Camden, the proposed drawings have been submitted with bubbles and annotations to highlight the changes from the approved drawings.

Amendment	Summary
Level 3 revised café layout	<p>Originally (refs. 2021/6235/P and 2021/6242/L), the café on Level 3 was to be located against the glass façade of the building overlooking Bedford Way. However, following the structural requirement to relocate the platform lift to the left-hand side of the Level 3 half-stair, a review of pedestrian flow and movement around the space was undertaken. The relocation of the café to the internal wall, would significantly improve pedestrian flow with the lift in its new location.</p> <p>With the café moving away from the façade, this also presents the opportunity to activate the elevation with seating and tables for staff and students. This would result in a positive contribution to the street scene within the Bloomsbury Conservation Area.</p> <p>A riser is required to facilitate the café and would also need to be relocated to serve the café. Therefore, the service penetrations through the Level 3 slab into the plant room below would also be relocated.</p>

Level 3 pavilion	During the progression of the works on site and the installation of the steelwork to form the new Level 3 entrance pavilion (as approved under application refs. 2021/6235/P and 2021/6242/L) it has been found that the street facing fascia panel will, in the worst case, project circa +65mm beyond the plane of the external wall to the halls within Core A and B. It was discussed and agreed on site that this difference is considered to be de-minimis.
Level 3 teaching room walls	<p>Following the careful demolition of the spaces on Level 3, the condition of the existing concrete was exposed and was noted to be very poor in places. This resulted in sections of wall being revealed which were not uniform in condition and finish.</p> <p>It was agreed that where the concrete is in good condition and will present as a whole section within the new room elevations, then the concrete will remain exposed. For areas where the condition of the concrete is poor or has been plastered historically, then the wall is to be boarded over to protect what concrete remains. The new boarding will allow any fixings to be borne by the boarding rather than the concrete.</p>
Level 3 teaching room layout	The area has been revised from meeting rooms and breakout space to additional teaching space based on the IoE's demand for in-person teaching. The revised room and corridor layout reflects the approach utilised throughout the rest of the refurbished areas and adjacent Level 3, Zone B space. It was agreed that this will not have any harmful impact and aligns with Lasdun's original vision to create a flexible education building.
Level 3 ventilation route	<p>Following the careful removal of the ceilings within the area of works on Level 3, it was found that the proposed route for new mechanical ventilation will have to go through a downstand section of concrete above a door that is deeper than expected. The overall opening size is to remain the same as previously proposed, however the new penetration will be deeper.</p> <p>The opening has been reviewed by Overbury and it is understood that there are no structural concerns.</p>
Level 7, 8 and 9 riser openings	<p>The Phase 2B approved scheme (ref. 2020/1567/L and 2020/1520/P) allowed for several openings within the riser to accommodate MEP service routes and access into the riser. The location of the openings as approved, had been based on information from records, as the risers were previously inaccessible.</p> <p>Once work commenced on Level 9, it was possible to access and survey the riser and existing services. As a result of survey findings, in some instances, the openings have had to change location to accommodate the found condition and/or location of existing services and infrastructure.</p>
Level 1 Core A lobby door amendment	Requirements for fire compliant doors have necessitated the need for the wall to be moved by 200mm to align with the existing slab.
Formation of new post room to Level 4	A new post room was formed on Level 4 and this required the wall to be brought out further to line up with the partition.
Rm 426 library refurbishment works	The refurbishment of the Library Service's Reading Room (Rm. 426 on the fourth floor) has been included in the scope of Phase 2. The majority of features in the room are modern additions and proposed works include replacement of blinds, floor covering and lighting; redecoration of walls and ceilings; creation of a new opening and replacement of the existing entrance door with a new demountable partition.
Changes to Level 5 layout	Proposed minor changes to the layout of Level 5 Zone C which include the addition of three new small offices/consultation rooms.
Revised wing terrace and refuge	Proposal to move the refuge point from the external terrace to an internal lobby and install a free standing gate to limit unsafe access onto the terrace.

strategy on Levels 6-8	Under the former proposal, a ramp up to the terrace was required which would result in any persons requiring a wheelchair needing to wait outside for rescue in the case of a fire. There will also no longer be a need to raise the handrails.
Level 9 Zone A design changes	The need to retain the structural wall in its' entirety has resulted in a reconfiguration of the office layouts at Level 9 Zone A.
Core A and Core B riser openings	The riser openings have been made smaller or changed location slightly to suit final services requirements and/or existing services.
Drama Hall window infill	In the Drama Hall, there is a projection room which includes a section of glazing. Retaining the glazing will mean that it is not possible to achieve a fire rated enclosure for the riser at this level, unlike on the other floors. It is proposed to infill this section of glazing with a fire rated material, which would then be painted to match the existing decoration.
Installation of digital signage and removal of existing halls signage.	It is proposed to install digital signage in the IoE Cores A and B at Levels 1-9, Zone B at Level 3 and 4, and Zone C of Level 5. A non-intrusive methodology for the installation of digital signage has been agreed for other locations in the IoE, but not for the cores. Existing halls signage will be removed where there is a conflict. The agreed methodology avoids drilling into the concrete walls, as brackets for the signage are fixed to the newly installed ceilings in the lobby and the cabling is via new containment routes above the ceiling.

Summary of proposals implemented under Phased Permissions

3.4. This section summarises the previously approved proposals that have been implemented under the Phased Permissions and provide context for the above amendments. As set out previously, while these works have been approved, they form part of this all-encompassing application that covers all previous sub-phases along with the design amendments incorporated.

External Alterations

Bedford Way and Thornhaugh Mews Entrance

3.5. Under permissions 2021/6235/P and 2021/6242/L (Phase 2C), proposals sought to improve accessibility, visibility and security of the entrances at Bedford Way and Thornhaugh Mews.

3.6. At Bedford Way, the 1992 addition of the staircase was removed, and a new entrance pavilion installed with two automatic circular drum doors. The extension accommodates a reception and contributes to improving security, visibility and egibility. It is also fully accessible. Excess signage located on the concrete pillars has also been removed. The proposals have taken inspiration from the entrance pavilion to the Curzon Cinema in the Brunswick Centre, which is considered to be a sympathetically designed entrance, which attracts people to the building.

3.7. At Thornhaugh Mews, a singular revolving door was replaced by a single curved door with two doors either side, guaranteeing a smooth flow of people into and out of the building, whilst ensuring full accessibility. Internal blinds are inserted along the façade to provide solar shading for the building.

3.8. The drawing extract and image below present the new entrances.



Figure 1: The new entrance pavilion at Bedford Way (Source: Design and Access Statement prepared by Penoyre and Prasad)

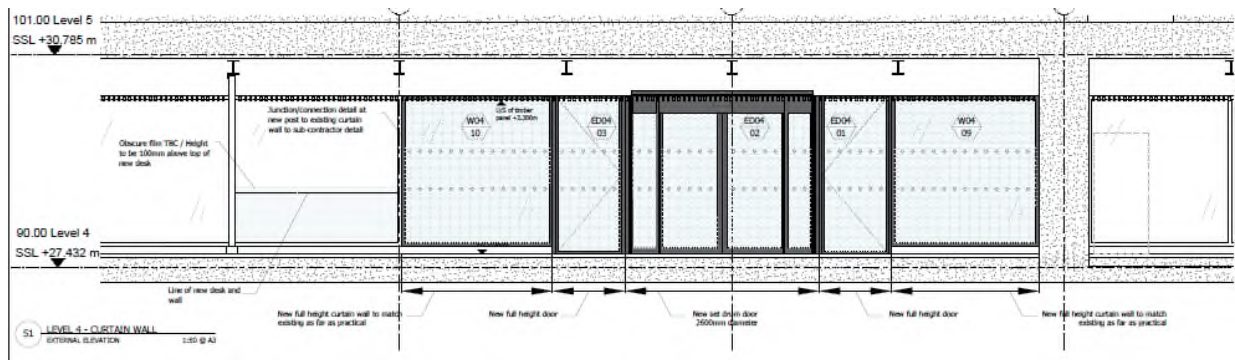


Figure 2: Proposed Level 4 Elevation at Thornhaugh Mews (ref. 3147-P3-2321) (Source: Architon LLP)

Other External Changes

- 3.9. Under the Phase 2A and 2B permissions, a number of minor external alterations were carried out to accommodate the internal reconfigurations of rooms and meeting health and fire safety requirements. This included new smoke ventilation panels in the concrete core along Bedford Way and new louvre panels on the Level 8 Core A wing.
- 3.10. In addition, there have been minor alterations to existing plant enclosure on the roof, a new external gate at Level 5 wing A, refurbished terraces at Levels 6-9 and secondary glazing installed in selected panels. Under the Phase 2C permission, the existing rooflights have been replaced with new operational motorised rooflights on Level 4, and external beacons have been installed as part of the fire alarm system upgrade on the Level 6 and 10 roofs. Under the Phase 2D permission, thermal upgrades have been carried out to the roof and portions of the external wall.
- 3.11. These minor external works are small-scale and all have minimal visual impact.

Internal Alterations

Reconfiguration and Refurbishment

- 3.12. The building was originally designed by Lasdun for flexibility, and as such the internal spaces within the building have been altered regularly over the last four decades. Under the Phased Permissions, the internal layout has been reconfigured and refurbished to make more efficient use of space and bring the building in line with modern teaching standards. This includes the removal of existing partitions and finishes and their replacement in new arrangements to create new offices, shared hubs, meeting rooms, lecture rooms, breakout spaces and quiet spaces across Levels 5 to 9 in

the wings and nibs and Level 5 Core C, and a new plant room on Level 8, wing A. In addition, there has been a light-touch refurbishment of the Lawton Room in Level 6 Core A and plant room 3/12 on Level 1.

- 3.13. In some double height rooms at Levels 4 and 5 in Cores C and B, and at Levels 2 and 3 in Core C, existing non-original mezzanine floors and stairs have been removed and replaced by a floorslabs at slightly revised heights. New openings and doors have been installed to create new teaching spaces in these rooms, along with associated mechanical engineering works. These works have resulted in an uplift of 12sqm F1 floorspace, although the perceived increase in useable floorspace has been considerably more through the more efficient use of previously inaccessible and poorly utilised space.
- 3.14. The entrance foyers at Levels 3 and 4 have also been reconfigured and refurbished, providing new reception desks and security gates at the Bedford Way and Thornhaugh Mews entrances. In addition, new furniture has been installed to create informal meeting areas and a new café area. Refurbishment works have included renovating concrete finishes and floor finishes.
- 3.15. Under Phase 2A, the sanitary facilities within Cores A, B and C were removed, reconfigured and replaced with new finishes. In some areas, this required additional space from the Cores floorspace and removal of a limited number of partitions. The new sanitary facilities are of a high modern standard and provide fully accessible facilities.
- 3.16. To facilitate the new teaching spaces and refurbishment works, existing mechanical and engineering services have been upgraded to improve working conditions and improve the energy performance of the building. This has necessitated a new riser within core areas to accommodate new services, new openings in the existing main riser in the core and other associated openings. These are detailed further in the submitted drawings.

Other internal works

- 3.17. Under Phase 2C, two new platform lifts have been installed in the Level 3 and 4 entrance foyer to provide access for all users. One is located within the first set of atrium stairs at the entrance to Bedford Way, and the second is a replacement of a previous platform lift at the end of the café on Level 3. These are fully glazed platform lifts which complement the architectural form of the building.
- 3.18. Refurbishment of the Level 1 foyer has included the stripping of plaster from concrete columns, and upgrade of finishes and fixings. Floor finishes have also been removed and replaced with dark rubber flooring.
- 3.19. Across the building, fire alarm detection points have been replaced or newly installed as part of an upgrade to a zonal fire alarm system. Card access points have also been installed on relevant access doors and lifts.
- 3.20. On Levels 4 to 9 between the IoE and IALs building, doors have been replaced to match the rest of the building upgrades.

4. Pre-application Discussions

- 4.1. The wider Masterplan and vision have been subject to formal and informal pre-application discussions with the London Borough of Camden, Historic England and the Twentieth Century Society.

Principle of a Masterplan Approach to Refurbishment

- 4.2. The proposals to refurbish the building were originally discussed with Camden in April 2016, when a meeting and walk around were held with the Conservation and Design Officer to present the masterplan concept.
- 4.3. At this meeting, the principle of refurbishment works and internal reconfiguration were discussed. Key areas of significance were highlighted by the officer, including the cores and central spinal corridors.
- 4.4. The principle of a phased masterplan approach was accepted.

Phase 2 Pre-Application Meetings

- 4.5. Pre-application meetings were held with the London Borough of Camden, Historic England and the Twentieth Century Society ahead of each sub-phase.

Design amendments Pre-Application Meetings

- 4.6. In relation to the design changes, a number of site visits have been held with Camden conservation officers in October 2022, January 2023 and June 2023. During these site visits, the design amendments were discussed and inspected by the conservation officers. The changes were considered minor, not material to the overall scheme and non-contentious.
- 4.7. In discussion with the planning officer and conservation officer, a strategy to formalise the design amendments was agreed in light of the complexity of the multiple phased planning and listed building consents that had previously been approved. It was agreed that a new planning and listed building consent application would be submitted encompassing all sub-phases with the design amendments incorporated.
- 4.8. A pre-application meeting was also held with the planning officer and conservation officer in March 2024 to discuss the approach to the revised drawings and submission documents. It was requested in this meeting that the drawings include bubbles with annotations around the changes from the approved permissions. It was also advised that the differences between what had been approved and what had changed needed to be clear throughout the application documentation.
- 4.9. The Proposed Development is substantially the same as the implemented Phased Permissions and under each of the phased permissions approved previously, the proposals have also undergone statutory public and stakeholder consultation with no objections received.
- 4.10. The proposed design changes are very minor, especially when considered in the context of the implemented Phased Permissions. Consequently, it is not considered necessary to undertake additional consultation. Planning Practice Guidance states that pre-application involvement will vary on a case-by-case basis and the level of engagement needs to be proportionate to the nature and scale of a development.

5. The Development Plan

5.1. This section sets out the development plan and site designations which apply to the application site.

National Planning Policy Framework

5.2. The National Planning Policy Framework (NPPF) (2023) is the overarching planning policy document for England.

5.3. The NPPF sets out a presumption in favour of sustainable development, which is described in Paragraph 7 as a “*meeting the needs of the present without compromising the ability of future generations to meet their own needs*”. Sustainable growth is about positive growth – making economic, environmental and social progress for future generations and the NPPF explains that development which is sustainable and accords with an up-to-date development plan should go ahead without delay.

5.4. The NPPF seeks to conserve and enhance heritage assets. It states in Paragraph 208 “*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, where appropriate, securing its optimum viable use.*”

The Development Plan

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

5.6. The application will be assessed against London Borough of Camden’s Development Plan. The Development comprises:

- The London Plan (2021);
- Camden Local Plan (2017);
- Camden Policies Map (2019); and,
- Camden Site Allocations Plan (2013).

5.7. The following documents are material considerations in the assessment of these proposals:

- Bloomsbury Conservation Area Appraisal and Management Strategy (2011); and,
- Camden Planning Guidance: Design (2019), 3: Energy Efficiency and Adaption (2021); Access for all (2019).

5.8. The London Borough of Camden recently carried out a Regulation 18 consultation on a new Draft Local Plan which closed in March 2024. Given the early stage in the production of the new Local Plan, the draft Local Plan carries limited weight in the decision-making process in line with Paragraph 48 of the NPPF.

Site Allocations

5.9. The following policy designations apply to the application site:

- Central London Area (Camden Policies Map, 2019);
- Bloomsbury Conservation Area (Sub-area 3: London University/British Library) (Camden Policies Map, 2019);
- Central Activities Zone (London Plan, 2021); and,
- Designated View 5A.2 Greenwich Park Wolfe statue to Tower Bridge – Right Lateral Assessment Area (Camden Policies Map, 2019).

6. Policy Assessment

Introduction

- 6.1. The policy assessment remains largely unchanged as compared to the approved Phased Permissions. Where an additional assessment of the design amendments has been made, this is highlighted in bold text. However, each application needs to be considered on its own merit, and so for completeness, this section assesses the proposals in full against the following key policy areas:
- Principles of proposals and land use;
 - Heritage and Design;
 - Accessibility;
 - Sustainability; and,
 - Noise.

Principles of Proposals and Land Use

- 6.2. London Plan Policy GG5 'Growing a good economy' seeks to conserve and enhance London's global economic competitiveness.
- 6.3. London Plan Policy E8 'Sector growth opportunities and clusters' supports London's role as a location for research and development. Collaboration between higher education providers should be encouraged. Whilst policy SD4 'The Central Activities Zone (CAZ) states that *"the CAZ as a centre of excellence and specialist clusters including function of (...) education (...) should be supported and promoted"*.
- 6.4. Camden's Local Plan seeks to support the concentration of educational institutions within Central London that form an integral part of the knowledge quarter. Local Plan Policy C2 'Community facilities' sets out that Camden will support the Higher Education sector and its needs to update and modernise and balance its requirements with those of other sectors in the local community. It states: *"The Council 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. In assessing proposals, the Council will also balance the impact proposals may have on residential amenity and transport infrastructure."*
- 6.5. Draft Local Plan Policy S3 'Bloomsbury Campus Area' sets out how the Council will support the Bloomsbury Campus Area to maintain and expand its role at the heart of higher education in Camden. The area should provide *"attractive and stimulating spaces for learning, research, sharing ideas, socialising and supporting students"* and should prioritise consolidating and increasing academic space in a way that celebrates the Universities' achievements and delivers sustainable growth.

Applicant's Response

- 6.6. For UCL to remain competitive as a higher education provider there is an expectation from staff and students for them to provide high quality, modern facilities which meet requirements. This helps to maintain UCL's role as a world class university which is important in maintaining UCL's role within the Knowledge Quarter and the Borough of Camden.
- 6.7. The proposals, forming part of a phased masterplan, are a sustainable response to the recent and increasing pressures on F1(a) floorspace within the wider UCL Bloomsbury Campus, and will optimise existing floorspace with limited impact on the occupants of the building and no impact to surrounding occupiers in the wider area.
- 6.8. The proposals are for the refurbishment of and extension to an established higher education building in Bloomsbury. The IoE is located within the 'knowledge quarter' in which there is a high density of higher education uses. The proposals will not change the use of the building and will contribute positively to the thriving knowledge quarter.
- 6.9. There is a small uplift of floorspace (62sqm) due to the new entrance area on Bedford Way. This, combined with internal reconfiguration aims to optimise the Level 3 and 4 foyer areas for students and staff.

- 6.10. The design amendments proposed as part of this application are consistent with the Masterplan and Phased Permissions and contribute to creating more useable teaching and learning space.
- 6.11. Overall, these works facilitate an improved user experience within the building, through providing high quality, modern facilities that are befitting of a world-class university. Approval of the proposals will support UCL in this Central London location in the London Borough of Camden, where it contributes positively to the cultural character of the area and its social and economic role.

Heritage and Design

- 6.12. Section 16 of the NPPF (2023) 'Conserving and Enhancing the Historic Environment' sets out the key tests which proposals will need to meet in relation to their impact on heritage assets.
- 6.13. Paragraphs 195-214 are of relevance. Paragraph 196 states that in determining applications, local authorities should take account of:
- a) *"The desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
 - b) *The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
 - c) *The desirability of new development making a positive contribution to local character and distinctiveness; and*
 - d) *Opportunities to draw on the contribution made by the historic environment to the character of a place."*
- 6.14. Paragraphs 205 – 214 specifically set out how impacts to heritage assets as a result of proposals should be considered. The NPPF sets out that great weight should be given to the assets' conservation with the level of weight correlating to the level of significance of the asset. Any harm should require clear and convincing justification.
- 6.15. Paragraph 208 states where a proposal is considered to lead to 'less than substantial harm' to the significance of a heritage asset, the harm should be weighed against the public benefits of the proposals, including where appropriate securing its optimum viable use.
- 6.16. London Plan Policy HC1 'Heritage conservation and growth' states in part C:
- "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."*
- 6.17. The Camden Local Plan (2017) Policy D2 'Heritage' seeks to preserve, where appropriate, and enhance Camden's heritage assets and their settings. It states the Council should resist proposals for a change of use or 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.
- 6.18. Camden's Design CPG sets out that the Council will make a balanced judgment having regard to the scale of any harm or loss and the significance of the asset affected, taking account of:
- The desirability of sustaining and enhancing the significance of any heritage asset/s and putting them to viable uses consistent with their conservation;
 - The positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality and health and wellbeing;
 - The desirability of new development that affects heritage assets to preserve and enhance local character and distinctiveness.
- 6.19. Paragraph 3.27 focuses on the impact of proposals on the historic significance of a listed building, including its features, such as:
- Original and historic materials and architectural features;

- Original layout of the rooms;
- Structural integrity; and,
- Character and appearance.

- 6.20. Camden will expect original or historic features to be retained and repairs to be in matching material and for proposals *“to seek to respond to the special historic and architectural constraints of the listed building, rather than significantly change them”* (paragraph 3.28). It states that listed building applications should be fully justified and demonstrate how the proposals would affect the significance of a listed building and why the works or changes are desirable or necessary.
- 6.21. Material weight will be given to the Bloomsbury Conservation Area Appraisal and Management Strategy as the site is located within Sub-area 3 of the Bloomsbury Conservation Area.
- 6.22. The Bloomsbury Conservation Area Appraisal and Management Strategy (2011), Paragraph 5.32 states that the visual characteristics of the Conservation derive from the experience of moving between streets, squares and other spaces, and the contrast between enclosure and open spaces. It is noted that the area is strongly influenced by a formal pattern of streets and spaces but it not planned to create distinctive formal vistas to architectural set pieces.
- 6.23. Draft Camden Local Plan (2024) Policy S3 Bloomsbury Campus Area: supports the provision of attractive and stimulating learning spaces and prioritises enhancing and respecting heritage assets in the area. Alongside this, sustainable growth to mitigate climate change and reduce carbon dioxide emissions is encouraged.
- 6.24. Draft Camden Local Plan (2024) Policy D1 Achieving Design Excellence: requires development to integrate building services equipment, minimising visual clutter.
- 6.25. Draft Camden Local Plan (2024) Policy D5 Heritage: states that the Council will resist any cumulative, incremental, changes to a designated heritage asset and where there is a concern the changes may impact on the significance of the building. The supporting text states that disabled access should be considered in listed buildings, and this will be balanced with the interests of conservation of preservation to achieve an accessible solution. All available options should be considered. The policy also supports proposals to adapt and improve listed buildings to climate change providing they do not cause significant harm to the historical interest of the building

Applicant’s Response

Internal Works

- 6.26. The building was originally designed by Lasdun for F1(a) use, for occupation by the Institute of Education. The proposals therefore allow for the continued use of the heritage asset for its optimum viable use.
- 6.27. Under the Phased Permissions, the proposals sought to make internal alterations to the Grade II* listed building. The proposals have included refurbishment and reconfiguration of specified areas surrounding the cores, replacement of mezzanine levels with new floors, works relating to the implementation of a renewed servicing strategy, redecoration throughout and insertion of a platform lift. These works have been implemented as approved, aside from the design amendments highlighted in this application.
- 6.28. It was agreed with officers and stakeholders that Lasdun’s original design intention was to create a flexible higher education building. Therefore reconfiguration of the Phase 2 areas to suit the evolving needs of the higher education occupier is in the spirit of the original design intent to create an adaptable building. The approved works and design amendments have restored the building closer to its original form, in line with Policy D2 ‘Heritage’ of the Camden Local Plan (2017) which seeks to preserve and enhance listed buildings.
- 6.29. The refurbishment and decoration works have rejuvenated the building with a design intent that respects and showcases the high quality concrete finishes and brutalist architecture. The floor, ceiling, wall and glazing finishes match those implemented across Phase 1 and Phase 2, which have been considered by officers to be very successful and of a high design quality. Where design amendments have been made, these are consistent with the design approach, which is considered to enhance the significance of the listed building and its architectural interest.
- 6.30. The Heritage Statement and addendum submitted with the application provides a full assessment of the heritage impact to the building and the heritage benefits considered to outweigh any impacts. The vast majority of works have no impact to the historic interest of the building. In particular, the removal of internal partitions and subsequent reconfiguration of floorspace is justified by the benefit of creating improved teaching, learning and administration spaces as well as the completion of Lasdun’s original design intent. In addition, the less-than-substantial harm generated by the installation of

secondary glazing is outweighed by the substantial public benefits in terms of supporting the long-term use of the building. Where the platform lift is being installed there will be a small loss of original fabric, and harm to significance as a result. However, given the improved access the small degree of harm, less than substantial in heritage terms, is outweighed by the greater public benefits of improving access to all areas of the building. Similarly, where new openings into concrete cores have resulted in less than substantial harm, this is considered to be outweighed by the public benefits of providing safe access for workers to maintain the building in the long-term.

- 6.31. Overall, the internal works comprise an important phase of the refurbishment of the building and result in bringing the selected areas up to modern standards and deliver a high quality design and finish, befitting of the Grade II* listed building. The public benefits of enabling the continued viable use of the building are considered to outweigh the less than substantial harm, in line with NPPF Paragraph 208.

External Works

- 6.32. Under the Phased Permissions, proposed external works included improvements to the Thornhaugh Mews entrance, a minor extension to the Bedford Way entrance, work to the external terraces on Levels 6-9, the lobby roof of Level 4 and roof at Level 10, installation of louvres at Level 8, rooftop plant enclosures and new smoke vents.
- 6.33. The external works to the roof and terraces, installation of new smoke vents, louvre panels and secondary glazing, and alterations to the Thornhaugh Mews entrance, have been implemented as approved, aside from design amendments highlighted in this application. These works have had a limited visual impact and are therefore considered to have a negligible impact to the significance of the listed building and the character of the Conservation Area. The minor negative impact of the small loss of historic fabric resulting from the installation of smoke vents and louvre panels has been considered to be outweighed by the considerable public benefits of upgrading the building. The benefits of these works include improved flow of people through the building, improved water tightness to the building, future-proofing of the building and historic fabric, and improved thermal efficiencies. All external works have been carried out to match the existing material palette of the building, ensuring the works are in keeping with the original architectural design of the building.
- 6.34. The most substantial external works approved under the Phased Permissions has been the new entrance pavilion on Bedford Way and associated removal of non-original stairs. This has been implemented as approved and now provides a clear and visible entrance from Bedford Way. The new extension maintains the architectural expression and rhythm of the building as originally designed by Lasdun and creates a sense of grandeur as people walk through to the main atrium, which is one of the most important spaces, architecturally, within the building. It was considered through the approval of this entrance pavilion that the less than substantial harm arising from the loss of original glazing was outweighed by the overall enhancements to the legibility and accessibility of the listed building. Overall, the public benefits of the improved accessibility and legibility of the building are considered to outweigh the less than substantial harm, in line with NPPF Paragraph 208.

Design Amendments

- 6.35. The proposed design amendments to the approved scheme have been assessed by Alan Baxter Limited through the submitted Heritage Statement Addendum. The majority of the amendments are very minor and have no impact on the significance of the building. The removal of proposed works to the exterior terraces on Levels 6-8 are considered to have a positive impact on the significance of the building by removing the need for works that would be detracting from its significance. In addition the omission of the opaque film along the curtain wall glazing where the café was proposed is considered to improve intervisibility between the street and interior.
- 6.36. The boarding up of the glazed panel to the projection box of the Drama Hall is considered to result in minor less-than-substantial harm. However, the reduced fire risk of the building which also contributes to its continued optimal use is considered to outweigh this minor less-than-substantial harm.
- 6.37. The removal of additional concrete to facilitate the approved service routes on the ceilings of the Level 3 teaching rooms and corridors is considered to result in minor less than substantial harm due to the removal of a small quantity of original fabric of the building. The principle of this has been agreed however, and the amendment is a small adjustment in comparison to the approved. It facilitates much need refurbishment and contributes to the continued use of the building as an education facility; its optimal use.
- 6.38. The infilling of the wall along the stairwell at Level 4 Zone A provides increased legibility and no loss in the sense of volume or detailing of the space. While this impacts the original fabric, it is considered that the minor less-than-substantial harm

is balanced by the high quality design and execution, along with the subsequent improved layout and reinstatement of the original layout in this location.

Summary

- 6.39. The proposals will deliver a number of public and heritage benefits that are considered to outweigh the identified less than substantial harm and will have mostly neutral or negligible impact on the significance of the building. In particular, the less than substantial harm arising from the small loss of the building's original fabric will be outweighed by the public benefits which include enhanced legibility and accessibility. Any minor negative impacts will be mitigated by the completion of Lasdun's design intentions and the benefits of the scheme. The public benefits are summarised in the next Chapter of this Statement.
- 6.40. The heritage benefits are identified in the Heritage Statement submitted in support of this application. The proposals are for a high quality refurbishment that will respect and enhance the heritage asset. For these reasons, the proposals align with national and local policy in relation to heritage and design.
- 6.41. When considered as a whole, the design amendments are not material to the wider scheme and are consistent with the design intent of the masterplan and the building. They contribute to securing the future of UCL in the building, which is the optimal viable use for which it was designed. The works continue to improve the function of the building and the user experience. On balance, the proposals will enhance and make a positive contribution to the heritage asset, despite the minor incidences of less-than-substantial harm identified in relation to specific interventions. The overall level of harm is considered to sit within the lower end of the less-than-substantial harm category. Overall, the public benefits of enabling the continued and optimum viable use of the building are considered to outweigh the less than substantial harm, in line with NPPF Paragraph 208.

Accessibility

- 6.42. Paragraph 135 of the NPPF (2023) states that planning decisions should ensure that development creates a place that is inclusive and accessible and promotes health and well-being with a high standard of amenity for existing and future users.
- 6.43. London Plan Policy GG1 'Building strong and inclusive communities' states that planning and development must:
- "Support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face."*
- 6.44. London Plan Policy D5 'Inclusive Design' seeks to ensure proposals achieve the highest standards of accessible and inclusive design by being *"convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment"*.
- 6.45. The Camden Local Plan Policy C6 'Access for all' seeks to promote fair access and remove barriers that prevent everyone from accessing facilities and opportunities. The Council therefore expect *"all buildings and places to meet the highest practicable standard of accessible and inclusive design so they can be used safely, easily and with dignity by all."*
- 6.46. The Camden Planning Guidance 'Access for all' (March 2019) provides additional guidance on the policies in the Camden Local Plan (2017). It ensures that the inclusive design is promoted and barriers that prevent people from accessing facilities are removed.
- 6.47. Draft Camden Local Plan Policy D1 'Achieving Design Excellence' states that all development must meet the highest practicable standards of accessibility and inclusive design.
- 6.48. Draft Camden Local Plan Policy A2 'Safety' requires developments to be designed to create an inclusive environment.

Applicant's Response

- 6.49. A key driver in developing this proposal was to ensure that the building was accessible for all users. Currently, the building is not inclusive. For instance, the route for wheelchair users from Bedford Way to the foyer at Levels 3 and 4 is convoluted and unclear.
- 6.50. The following elements of the proposal seek to address the current accessibility issues present in the building:

- New platform lift taking users from Levels 3-4;
- Removal of the staircase at the Bedford Way entrance;
- New automatic doors at the Bedford Way and Thornhaugh Mews entrance;
- New entrance pavilion guides users to the entrance; and,
- More direct routes round the building.

- 6.51. The addition of a clearer and more pronounced entrance at Bedford Way will help guide all users to the entrance of the building. Whilst the removal of the stairway at the entrance, and creation of an inclusive access, will result in a more accessible building for all. This is in line with UCL's duty to both staff and students under the Equality Act 2010.
- 6.52. Once within the building, care has been taken to ensure the proposals further improve accessibility, particularly given the split level design of the main foyer at Levels 3 and 4. Two platform lifts are proposed to assist people with navigating between the multiple floor levels.
- 6.53. The London Plan (2021) requires applicants to meet the highest level of accessible and inclusive design. The key elements mentioned above seek to ensure that all users can clearly locate and access the building. As such, the proposals are both national and local policy compliant.
- 6.54. The design amendments proposed with this application are consistent with the design intent of the approved masterplan. In particular, the revised wing terrace and refuge strategy will improve accessibility as it removes the need for people with a disability to wait outside for rescue in a fire. Therefore, the proposals continue to comply with national and local policy. Overall, the public benefits of improved accessibility and fire safety are considered to outweigh the less than substantial harm of the proposals, in line with NPPF Paragraph 208.

Sustainability

- 6.55. At the heart of the NPPF is the presumption in favour of sustainable development.
- 6.56. London Plan Policy SI2 'Minimising greenhouse gas emissions' seeks to ensure that development proposals make the fullest contribution to minimising carbon dioxide emissions.
- 6.57. London Plan Policy GG6 'Increasing efficiency and resilience' seeks to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050.
- 6.58. Local Plan Policy CC1 'Climate Change Mitigation' requires development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 6.59. Local Plan Policy CC2 'Adapting to Climate Change' requires development to be resilient to climate change. The Council will promote and measure sustainable design and construction by ensuring non-domestic developments achieve a BREEAM rating of 'excellent' encouraging zero carbon in new development from 2019.
- 6.60. Camden's Sustainability CPG recognises that energy efficiency measures for existing buildings will be bespoke to the building and that sensitive improvements can be made to historic buildings.

Applicant's Response

- 6.61. UCL's Sustainability Strategy commits to all buildings to be net zero carbon by 2024 and for the whole institution to be net zero carbon by 2030. The proposals for the major refurbishment of the IoE have helped UCL to achieve this by considering how to provide a more sustainable historic building from the outset of the works. The Phase 2 proposals will help to work towards the 39% reduction in carbon dioxide emissions as set out in the Phase 2 energy strategy.
- 6.62. This application has been accompanied by the previously submitted sustainability statements which cover the energy strategy, overheating risk analysis, thermal comfort assessment and BREAAAM strategy.
- 6.63. In addition, an addendum is submitted which considers the previously approved sub-phases along with the design amendments as a whole and confirms that as the changes affect the M&E principles or the element build-up, there will be a negligible cumulative impact on sustainability performance of the building. Therefore, the conclusions of the earlier submitted sustainability statements are not changed by the design amendments.

- 6.64. Key measures which have been implemented across the wider masterplan include:
- Improving the thermal performance of the building fabric in line with heritage constraints;
 - Upgrading all major MEP systems and lighting;
 - Retaining connection to the Bloomsbury Heat and Power network'; and,
 - Targeting a BREEAM rating of 'excellent'.
- 6.65. A BREEAM rating of 'excellent' is being targeted for the entirety of the works being carried out to the IoE and the project is on track to score 75.8% which surpasses the 'excellent' score.
- 6.66. More specifically, the installation of new and replacement secondary glazing, as well as the installation of insulation on the Level 6-9 terraces, will contribute towards improved thermal performance and energy efficiency. In the building's existing state with single glazed façade and uninsulated concrete walls, it experienced poor thermal performance and low energy efficiency. The proposals are considered to be a sustainable solution, given the high heritage significance of the external façades. The installation of new and replacement secondary glazing was considered the most appropriate solution to balance the need to protect, preserve and enhance the heritage asset, as well as the sustainable credentials of the building.
- 6.67. The sustainable refurbishment of the IoE has been considered carefully in line with advice from the heritage consultant Alan Baxter Limited and in line with guidance set out in the Camden Planning Guidance – Sustainability CGP3. Despite the constraints of the Grade II* listed building, the proposals significantly improve energy performance of the building. Overall, the public benefits of the improved sustainability of the building, enabling its continued future use, are considered to outweigh the less than substantial harm of the proposals, in line with NPPF Paragraph 208.

Noise

- 6.68. Paragraph 191 of the NPPF states that planning decisions should ensure that new development mitigates and reduces to a minimum potential adverse impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts on health and quality of life.
- 6.69. London Plan Policy D14 'Noise' states that developments need to consider noise-sensitive uses in the surrounding area where new development is proposed and address the specific local context in an acoustic assessment when detailing mitigating efforts.
- 6.70. Camden Local Plan Policy A1 'Managing the Impact of Development' resists development that will be harmful to the amenity of occupiers and nearby properties. When assessing proposals against this policy, the Council will consider a range of factors, including overshadowing and outlook, as well as noise and vibration levels. In relation to these factors, the policy explains that the Council will also consider the inclusion of appropriate attenuation measures.
- 6.71. Camden Local Plan Policy A4 'Noise and vibration' sets out Camden's aim to ensure that noise and vibration is controlled and managed, and states that planning permission will not be granted for development likely to generate unacceptable noise and vibration impacts. Recognition is given to the need to guard against harm to local amenity, health, and quality of life. This requires an applicant to mitigate any potential impacts upon sensitive uses in the surrounding area and may necessitate preparation of an acoustic report to accompany the application. The installation of plant equipment will require demonstration of proof that it is clearly needed.
- 6.72. Draft Camden Local Plan (2024) Policy A4 'Noise and Vibration' requires the submission of a noise assessment, ensuring that where noise mitigation is required, this is incorporated into the proposed development at the design stage, support retrofitting measures to existing noise generating sources to minimise impact of noise and vibration on occupiers.

Applicant's Response

- 6.73. Proposed plant as part of the Phase 2A and 2B applications were accompanied by an acoustic report demonstrating the the proposed plant were in accordance with Camden's noise requirements. A pre-commencement condition attached to the Phase 2B permission required the submission of details confirming the levels of external noise emitted from plant were in line with Camden requirements. An updated Stage 4 acoustic report was submitted and approved to discharge the condition.
- 6.74. This planning and listed building consent application is accompanied by the Stage 4 acoustic report and an addendum prepared by BuroHappold which confirms that the design amendments proposed as part of this application do not result

in any change to the compliance with Camden's noise requirements. The proposals therefore comply with local policy in relation to noise and vibration and will have no impact on the amenity of local occupiers.

7. Benefits of the Proposal

- 7.1. Overall, the proposals will deliver a significant number of public and heritage benefits that will outweigh the minor instances of 'less than substantial harm' identified as a result of the proposed works. On this basis, the proposals meet the tests set out in the NPPF and local policy.
- 7.2. The public benefits of the proposal include:
- The new teaching spaces are vital for UCL in terms of **fulfilling the role of a higher education** provider in Camden and will actively support **UCL's important contribution to the expanding knowledge quarter** in Camden, and wider economic function of the London CAZ.
 - **More efficient use of underutilised space** on Levels 2 and 3 of Core C, Level 4 and 5 of Core B and C, and Levels 5-9 on the Nibs and Wings connected to Core A, with minimal impact to historic fabric and no impact on the surrounding area.
 - The **greater use of the F1(a) space** at Levels 3, 4 and 5 will help **fulfil demand for high quality F1(a) spaces which can be used for collaboration and studying** in the Bloomsbury area.
 - Provision of **new and accessible sanitary facilities, improving user experience and increases accessibility for all.**
 - The new entrance onto Bedford Way **restores the original grand arrival sequence of the building in with Lasdun's original design intention.**
 - Refurbishment and decoration works which are **respectful and enhance the significance** of the listed building and its architectural interest.
 - Proposals **complete Lasdun's original design intention** while aligning the building with **modern health and safety, and fire safety standards.**
 - The relocation of the café space **enhances the building's contribution to the Bloomsbury Conservation Area.**
 - The internal proposals seek to **restore the building closer to its original form by removing non-original features and decorating the building in line with its original form.**
 - The proposals **improve accessibility and legibility** in and around the building. More users will be able to **appreciate and interact with the listed building.**
 - The proposals **reduce inequality** by allowing all users to easily access all areas of the building.
 - The proposals will **improve security** within the building ensuring that it is safe and secure to use.
 - The works will **help to secure the future of UCL IoE in the building**, which is the **optimal viable use** for which it was originally designed.
 - **Increased investment** into this importance heritage asset to **ensure its viability for its original purpose** into the 21st century.
 - The proposals will **improve the sustainability of the building** and contribute towards UCL's vision to be zero carbon by 2030.
 - The proposals are sustainable and will contribute towards the wider IoE masterplan target to **achieve a BREEM rating of 'excellent'.**

8. Conclusion

8.1. This planning statement has been prepared in support of a full planning and listed building consent application for the following proposed works at the IoE:

“Internal and external works to the Institute of Education, 20 Bedford Way. Internal works comprising reconfiguration and refurbishment of Levels 5-9 Core A nib and wing, Level 6 wing A Lawton Room, Level 1 plantroom, Level 4 Room 426, Level 5 Zone C and Levels 1, 3 and 4 foyers; replacement mezzanine levels to selected rooms at Levels 2 and 3 in Core C and Levels 4 and 5; creation of new plant room at Level 8 wing A; new post room to Level 4; installation of platform lifts at Level 3 and 4 foyers; installation of fixed furniture and security gates in foyers; replacement of doors to the IALs building at Levels 4-9; infill of Level 1 drama hall window; replacement of existing halls signage with new digital signage at Levels xx Core xx; and other associated internal works. External works comprising a new extended entrance at Bedford Way; a reconfigured entrance at Thornhaugh Mews; alterations to roof plant enclosure and new chiller unit; repairs and installation of insulation to external Levels 6-9 terraces; installation of secondary glazing to selected panels; new louvres at Level 8 wing A; smoke ventilation panels along Bedford Way elevation; refurbishment and repairs to Level 4 and 10 roof; new external gate at Level 5 wing A; replacement rooflights at Level 4; external beacons at Level 6 and 10 roof; and other associated external works.”

8.2. This application will continue to implement the design intent and approved finishes as installed in the Phase 1 and 2 areas. This demonstrates a continued and committed approach by UCL to investing in the listed building to deliver high quality F1(a) floorspace in Camden and to improve the experience of staff and students who occupy the building.

8.3. The proposals have been fully considered against relevant planning policy at National, Regional and Local level, and discussed during the pre-application stage with Camden Planning and Conservation Officers who have raised no concerns with regards to the proposed works.

8.4. Despite the restrictions of being a Grade II* listed building, the proposals will significantly improve the energy performance of the building which will help to align it to modern standards and improve the usability of the space for students and staff.

8.5. Accessibility has been a key driver and these proposals seek to ensure that all users are able to access the building easily and equally. The improved entrance on Bedford Way will act as the focal point for the building and reinstate the grandeur of the building. It will be enjoyed by all including staff, students and members of the public.

8.6. It is considered that the vast majority of works have no or neutral impact to the historical interest of the building, aside from the minor instances of ‘less than substantial harm’ identified as a result of the proposed works. The scheme offers substantial public benefits in terms of supporting the long-term use of the building which outweigh these instances of less-than-substantial harm identified and assessed within this Planning Statement and the Heritage Statement prepared by Alan Baxter Limited. Any minor negative impacts will be mitigated by the completion of Lasdun’s design intention; the internal layout of the building was envisioned to change as the needs of the university evolved, so that the building could remain viable in the long term as well as the improved accessibility.

8.7. The design amendments set out within this application are not material to the approved Phased Permissions and are consistent with the masterplan design intent. The amends will have negligible impact on the approved works and where a less-than-substantial harm has been identified, this is outweighed by the public and heritage benefits delivered by the proposals.

8.8. For these reasons, planning and listed building consent should be granted for these proposals.

Appendix A

Table of Historic Planning Applications

Application Reference	Description of Development	Approval Date
2024/2060/P 2024/2088/L	Replacement of plant equipment at Level 9 roof and installation of ladders and step-over on Level 12 roof, installation of a FlexStep and associated structural reinforcement at Level 4 and 5, minor alterations for service installations and structural interventions on Levels 2, 4, 5, 6 and 7, at the Institute of Education; and other associated works.	Approved 31.07.2024
2023/1013/P 2023/1111/L	Installation of new plant equipment comprising bulk fuel tank and control, condenser unit, and three new bollards to the rear service yard level and associated works.	Approved 04.05.2023
2023/0291/L	Refurbishment and reconfiguration of Level 5 of Zone C of the Institute of Education, 20 Bedford Way comprising: the removal and replacement of existing partitions to create new workspaces; works to ceilings; installation of new lighting; installation of secondary glazing, new flooring and doors; and other associated works.	Approved 07.03.2023
2022/3263/L	Proposed internal works to third floor, involving the removal and the installation of replacement lighting and associated controls, fixtures and fittings.	Approved 02.08.2022
2022/1846/L	Refurbishment and reconfiguration of Level 9 of Zone C of the Institute of Education, 20 Bedford Way comprising: the removal and replacement of existing partitions to create new workspaces; works to ceilings; the installation of secondary glazing; new flooring and doors; thermal upgrades to the roof and portions of the external wall at Level 9; and other associated works.	Approved 10.05.2022
2022/1037/L	Refurbishment and reconfiguration of Level 5 of Zone C of the Institute of Education, 20 Bedford Way comprising: the removal and replacement of existing partitions to create new workspaces; works to ceilings; the installation of secondary glazing; new flooring and doors; and other associated works.	Approved 24.03.2022
2021/6242/L	Refurbishment and reconfiguration of selected areas comprising: a new extended entrance at Bedford Way, a reconfigured entrance at Thornhaugh Mews; insertion of a new platform lift at Level 3 and a	Approved 22.12.2021

2021/6235/P	platform lift serving Level 3 and 4; refurbishment of the foyers at Levels 1, 3 and 4 including the installation of fixed furniture and security gates; replacement of doors to the IALS building at Levels 4-9; and other associated works.	
2021/5115/L	Installation of one condenser unit at Level 3 and two condenser units at Level 2 on the Service Road of the Institute of Education and associated works.	Approved 30.11.2021
2021/5006/P		
2018/3322/L	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.	Approved 14.11.2021
2020/1787/L	Refurbishment of the lifts within the Cores B and C including the upgrade of landing indicators, evacuations intercoms, landing stations, fire control switches, landing doors, service stations, header/overgate panels and other associated works.	Approved 05.08.2021
2020/1567/L	Refurbishment and reconfiguration of selected areas of the Institute of Education comprising: refurbishment works to the Level 1 plantroom; reconfiguration and refurbishment of Levels 5-9 in the nib and wing connected to Core A, and the Lawton Room at Level 6 adjoining Wing A; repairs and installation of insulation to the external terraces connected to these areas; installation of secondary glazing to these areas; 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.	Approved 15.06.2020
2020/1520/P	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.	Approved 15.06.2020
2019/6410/L	Minor alterations and refurbishment works to Cores A, B and C including the provision of new sanitary facilities, replacement of servicing, addition of new	Approved 02.03.2020

	risers and new access panels to the existing risers within the Cores and installation of secondary glazing and obscure film to selected glazing panels within these areas; alterations to the existing plant enclosure on the roof and the installation of a new chiller unit within this enclosure; and, replacing the existing mezzanine levels in the double height observation and archive rooms at level 4 and 5 with a new floorplate and associated works.	
2019/6386/P	Minor alterations and refurbishment works to selected areas, including Cores A, B and C and alterations to the existing plant enclosure on the roof and the installation of a new chiller unit within this enclosure.	Approved 02.03.2020
2019/5146/L	The installation of two pedestal floor boxes and brackets for wall-mounted TV displays, video conferencing hardware, and a sound bar in Committee Room 3 (Room 420) of 20 Bedford Way.	Approved 11.12.2019
2019/3900/L	Internal and external alterations associated with the conversion of existing garage area to office space including removal of mesh cladding and installation of curtain wall, glazing, louvre panels and double door and internal layout changes	Approved 23.10.2019
2019/3624/P	External alterations including removal of existing mesh cladding and installation of curtain wall, glazing, louvre panels and double door set associated with the conversion of existing garage area to create an internal site office to university (Use Class D1).	Approved 23.10.2019
2019/1721/P	Removal of no.3 existing and installation of no.7 new lamp posts around rear forecourt of University building (Use Class D1).	Approved 06.09.2019
2019/1793/L		
2019/054/L	The reconfiguration and refurbishment of the Level 1 washrooms.	Approved 02.05.2019
2018/2874/P	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.	Approved 14.11.2018
2017/2543/L	A new lift serving levels 2-4 within the west wing, and internal alterations and refurbishment works at levels	Approved 30.10.2017

2-4 of the west wing, and at level 3 between Cores B and C, including the reconfiguration of internal layout, revised servicing arrangements and new secondary glazing.

Appendix B

Proposed condition wording

Permission pursuant to	Condition No.	Approved Condition Wording	Proposed Condition Wording
2020/1520/P	4	<p>Prior to commencement of the relevant works, details shall be submitted to and approved in writing by the Council, of the external noise level emitted from plant/machinery/ equipment and mitigation measures as appropriate. The measures shall ensure that noise levels at a point 1 metre external to sensitive facades shall be at least 10dB(A) less than the existing background measurement (LA90), expressed in dB(A) when all plant/equipment (or any part of it) is in operation unless the plant/equipment hereby permitted will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps), then the noise levels from that piece of plant/equipment at any sensitive façade shall be at least 15dB(A) below the LA90, expressed in dB(A).</p>	<p>Prior to the commencement of the relevant works, all plant machinery/equipment and noise mitigation measures as appropriate shall be installed and maintained in accordance with the Stage 4 Acoustics Report prepared by BuroHappold dated 9 September 2022, and retained thereafter.</p>
2020/1567/L	5	<p>Before the relevant part of the work is begun, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:</p> <ul style="list-style-type: none"> a) Details of new light fittings b) Typical sample panels of any concrete cleaning and areas of making good to the concrete <p>The relevant part of the works shall be carried out in accordance with the details thus approved.</p>	<p>New light fittings shall be installed in accordance with the following documents and retained as such thereafter:</p> <p>Drawing Nos: LP-CA-05DR-E-3005, LP-CA-06-DR-E-3006-1, LP-CA-06-DR-E-3006-2, LP-CA-07-DR-E-3007-1, LP-CA-07-DR-E-3007-2, LP-CA-08-DR-E-3008-1, LP-CA-08- DR-E-3008-2, LP-CA-09-DR-E-3009-1, LP-CA-09-DR-E-3009-2 and Luminaire Schedule prepared by Long and Partners dated 05/05/2022</p> <p>Concrete cleaning and making good to the concrete shall be carried out in accordance with the following documents and retained as such thereafter:</p> <p>Drawing Nos: Overbury_Concrete Methodology_20240311(2), Renderoc-FCR-July20(2), Renderoc_HB40_AS4020- 2018(2)</p>

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Samples of materials in respect of the following shall be provided on site and approved in writing by the local planning authority before the relevant part of the work is begun:

a) A sample panel showing the removal method of the plaster finish from the concrete

b) A sample panel demonstrating the method of repairs to existing concrete

Removal of the plaster finish from concrete shall be carried out in accordance with the following document and retained as such thereafter:

Prostrip Demolition Services Method Statement

Regarding part B, as it is requesting the same details as Condition 5 Part B for Phase 2B, under the new application we would suggest this is covered under that condition.



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