



**UCL – Institute of Education  
Thornhaugh Mews  
Planning Statement**

October 2016

# Contents

1	Introduction	3
2	Site Location	5
3	Planning History	7
4	Background to the Proposals	11
5	The Proposals	13
6	Policy and Planning Justifications	15
7	Conclusion	23

# 1 Introduction

- 1.1. This planning statement has been prepared by Deloitte LLP on behalf of University College London (“UCL”), in support of a Section 73 minor-material amendment (“MMA”) application and corresponding listed building consent (“LBC”) application at 20 Bedford Way, the UCL Institute of Education (“the site”).

## About the UCL Institute of Education

- 1.2. UCL recently merged with the Institute of Education, the world’s leading centre for education and related social science.
- 1.3. Founded in 1902, it is today unique amongst faculties of education in its scale and in the depth and breadth of its expertise, unparalleled both in its impact nationally and in its work with education systems overseas. In the 2016 QS rankings, the Institute was placed first in the world for education for the third year running, ahead of Harvard, Stanford and Melbourne.
- 1.4. UCL IoE’s [research](#) addresses society's most important challenges and its [teaching](#) inspires its students by providing them with first-hand experience of leading-edge research and knowledge creation. The institute plays an important global role, contributing to international academic and policy-related arenas and networks developing the fields of education and social science worldwide.
- 1.5. Since UCL’s merger with the IoE, a review of the institute’s estate has been carried out to identify opportunities for consolidation, rationalisation and improvements to its estate.

## About UCL

- 1.6. UCL is London’s leading multidisciplinary university. Following expansion over recent years, it now has over 12,000 staff and 38,000 students. This includes over 17,000 undergraduate students and 20,000 graduate students.
- 1.7. UCL provides excellence and leadership in teaching and research, was ranked fourth in the QS World University Rankings 2012/13 and 2013/14, seventh in 2015 and is among the top 15 universities ranked by The Times (14), The Guardian (11) and The Sunday Times (10).
- 1.8. UCL hosts a wide variety of research institutes with an even wider variety of funding partners. Funding partners and supporters of research include UK and overseas Government Departments, a range of UK and international charities and charitable foundations. Partners in research projects include a wide selection of the world’s other great academic and research institutions.
- 1.9. UCL competes on a global stage with other top-rank universities overseas (such as Harvard, Yale and Stanford) and in the UK (such as Oxford, Cambridge and Imperial College). In order to attract the best graduate researchers and academic staff and the brightest undergraduates it is essential to be able to offer world class facilities and a high quality environment.
- 1.10. Over the past six years, UCL has undergone significant investment in implementing its core campus masterplan, Transforming Bloomsbury.

## The Proposals

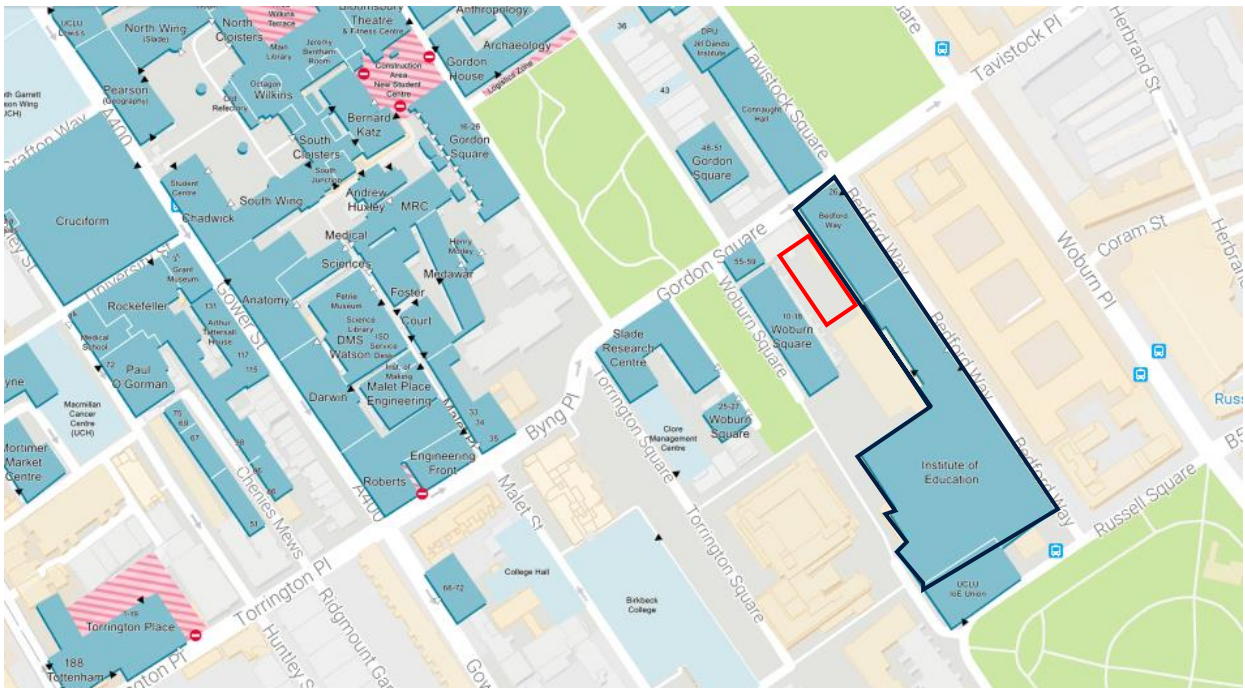
- 1.11. The MMA seeks to vary application 2008/1237/P to allow for design amendments to the 2009 consented scheme. The design amendments are set out in full within the accompanying application drawings and Design and Access Statement, and are summarised in Section 5 of this statement.

- 1.12. The MMA also seeks to vary the wording of some of the conditions from the 2009 consent. A schedule of the conditions and the proposed varied wording where applicable is set out in Section 7 ('The Application') of this statement.
- 1.13. The schedule of conditions has been updated to account for the recently added approved drawings condition that was approved through a S96a application on 11 August 2016.
- 1.14. A LBC application has also been submitted to formalise the design amendments in respect of the impact of the proposals on the setting of 20 Bedford Way (Grade II\* Listed) and adjacent Woburn Terraces (Grade II Listed).
- 1.15. On 16 December 2009, planning application 2008/1237/P, along with applications for listed building consent ("LBC") 2008/1239/L and 2008/1594/L, ("the 2009 consents") were granted on appeal for (in summary), the rear extension for educational use including offices, teaching and library archive facilities, the associated removal of part of a rear garden wall to properties 10-18 Woburn Square and landscaping. A full account of the site's planning history is provided in Section 4 of this statement.
- 1.16. This MMA and LBC application seeks to amend the approved building envelope for the extension from a sloped design to a stepped design, reintroduce the cantilever, increase the width of the stairs by 400mm and amend the landscaping.
- 1.17. The applications comprise and are supported by the following:
- Planning application form and certificates prepared by Deloitte Real Estate ("DRE");
  - Site Location Plan prepared by Shephard Epstein Hunter ("SEH");
  - Approved and Proposed Plans, Elevations and Sections prepared by SEH (for a full list of the drawings, please refer to the drawing schedule);
  - Design and Access Statement ("DAS") prepared by SHE including a section on Heritage Impacts;
  - Planning Statement prepared by DRE; and,
  - BREEAM Pre-Assessment prepared by Ramboll.
- 1.18. The remainder of this Statement is structured as follows:
- Section 2: Site Location
  - Section 3: Planning History
  - Section 4: Context to Proposals
  - Section 5: Proposals
  - Section 6: Planning Considerations
  - Section 7: The Application
  - Section 8: Conclusions

## 2 Site Location

### Location

- 2.1. The site is highlighted in red on the plan below. It is located to the rear of the existing Institute of Education (“IoE”) building (black on plan below). It is located on the fringe of UCL's Bloomsbury Campus and prevailing uses in the area are primarily Use Class D1.
- 2.2. The front entrance of the IoE building is from Bedford Way. The rear access is from Thornhaugh Mews, accessed from Woburn Square.



### Key

- The site
- IoE

Figure 1: Location (Source: UCL Bloomsbury Campus Map)

### Policy Designations

- 2.3. The Site has the following national, regional and local policy designations:
  - Grade II\* listed
  - Designated View – 5A.2 'Greenwich Park Wolfe statue to Tower Bridge - Right Lateral Assessment Area';
  - Central London Area; and,

- Conservation Area Bloomsbury (Sub area 3).

## Heritage and Conservation

- 2.4. The Site is located in Sub-area 3 of the Bloomsbury Conservation Area.
- 2.5. The Bloomsbury Conservation Area Appraisal and Management Strategy (BCAAMS) states that Sub-area 3 is dominated by large scale institutional buildings. It states that:

*"the rear library extension to the rear of SOAS known as the Philips Building, and the Institute of Education (grade II listed) are seen as a group in views from Torrington Square, Woburn Square and Thornhaugh Street. Both by Denys Lasdun, they share a common vocabulary derived from the postwar British Brutalist architecture: stark concrete, strongly modelled structures with horizontal glazing, and distinct sculptural forms including vertical circulation towers. While radical interventions in the Bloomsbury townscape, the Lasdun buildings are now part of the established character of the Conservation Area. The open spaces to the rear of the building provide a green link between Woburn Square and Thornhaugh Street".*

## Institute of Education

- 2.6. The IoE building was listed as Grade II\* on 4 December 2000 (List Entry 1246932).
- 2.7. Extracts of the listing description are included below (Source: Historic England, The List, List entry 1246932):
- *The building was designed by architect Denys Lasdun and was erected in 1970-6 and extended in 1990-3;*
  - *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 considered to be exceptional with the contrasting texture of materials unique;*
  - *the relationship between the spine building and the SOAS pavilion is paramount;*
  - *The IoE building is considered to form a contrasting mass to the square pavilion of Lasdun's extension to the School of Oriental and African Studies (SOAS), "with which it forms an exceptionally strong group.*

## Surrounding Area

- 2.8. The School of Oriental and African Studies ("SOAS") Philips building is also Grade II\* listed and was granted this status on 20 May 2011. It was also designed by Lasdun.
- 2.9. Woburn Terrace to the rear of the building, and Gordon Terrace to the north of the building are Grade II Listed.

# 3 Planning History

3.1. This Section of the Statement sets out the planning history of the site.

## Planning History

3.2. The main IoE building has been subject to a number of planning applications including two extensions to the original 1970s building.

### The 1990 Consent

3.3. Application 9000181 for: *"the erection of a 3 storey extension to the existing Institute of Education building to form a new library"* was granted on 11 October 1990. An extract of the approved plan is included for reference below. This permission was implemented and the library is in place.

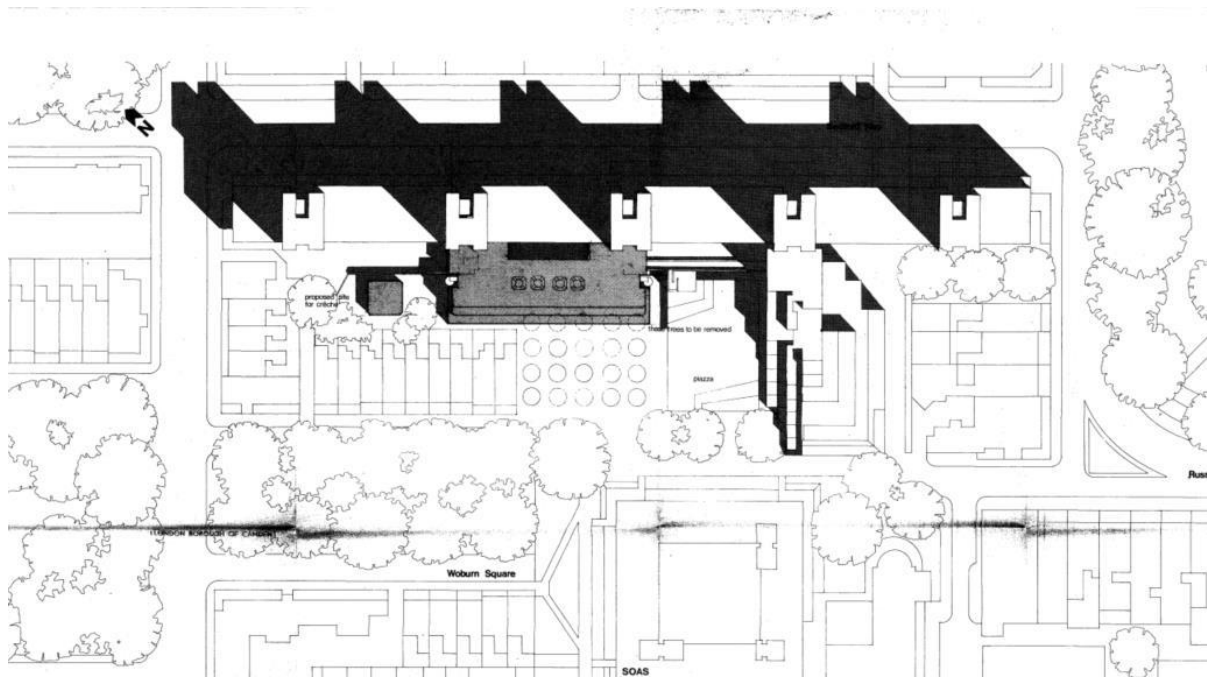


Figure 2: 1990 Approved Plan (Source: Camden Online Planning Application Database, application reference 9000181)

### The 2009 Consents

3.4. In May 2008 applications 2008/1237/P, 2008/1239/L and 2008/1594/L were submitted for the following:

#### Planning Application ref. 2008/1237/P

*"Erection of rear extension (levels 2-9) for educational use in connection with the Institute of Education including provision of offices, teaching and library archive facilities as shown on drawing numbers: 000 Rev PL; 002 Rev PL; 003 Rev PL; 004 Rev PL; 005 Rev PL; 006 Rev PL; 007 Rev PL; 008 Rev PL; 009 Rev PL; 010 Rev PL; 011 Rev PL; 013 Rev PL1; 014 Rev PL1; 015 Rev PL1; 016 Rev PL1; 018 Rev PL1; 019 Rev PL1; 021 Rev PL1; 022 Rev PL1; 023 Rev PL1; 024 Rev PL1; 025 Rev PL1; 026 Rev PL1; 027 Rev PL1; 028 Rev PL1; 030 Rev PL; 041 Rev PL3; 042 Rev PL3; 043 Rev PL4; 044 Rev PL4; 045 Rev PL2; 046 Rev PL2; 047 Rev PL2; 048 Rev PL2; 049 Rev PL2; 051 Rev A; 052*

*Rev PL; 053 Rev PL1; 055 Rev PL; 056 Rev PL; 057 Rev PL1; 061 Rev PL; 065 Rev PL; 066 Rev PL and 067 Rev PL.”*

- 3.5. The planning application works included the demolition of the rear garden wall to the properties of 10-18 Woburn Square (the works covered by the listed building consent application ref. 2008/1549/L below). The demolition of the wall is shown on the approved Proposed Mews Plan ref. 055.

**Listed Building Consent Application 2008/1239/L**

*“Erection of rear extension (levels 2-9) for educational use in connection with the Institute of Education including provision of offices teaching and library archive facilities includes removal of existing stairs and end wall to existing library.”*

- 3.6. This listed building application also included Proposed Mews Plan ref: 55 showing the demolition of the garden wall.

**Listed Building Consent Application 2008/1594/L**

*“Removal of part of rear garden walls to properties 10-18 Woburn Square to create new landscaped area incorporating seating hard and soft landscaping in connection with scheme for the erection of rear extension (levels 2-9) for educational use in connection with the Institute of Education including provision of offices teaching and library archive facilities at 20 Bedford Way.”*

- 3.7. The applications were refused at Committee in December 2008 by members, against the officer’s recommendation.
- 3.8. On 19 August 2009, appeals were lodged for all three applications. Following this, the applications were approved on 16 December 2009.
- 3.9. The consents were subject to conditions and the planning consent was also subject to a Section 106 Agreement.
- 3.10. An extract of the approved plan is included below, the approved extension is highlighted in blue.

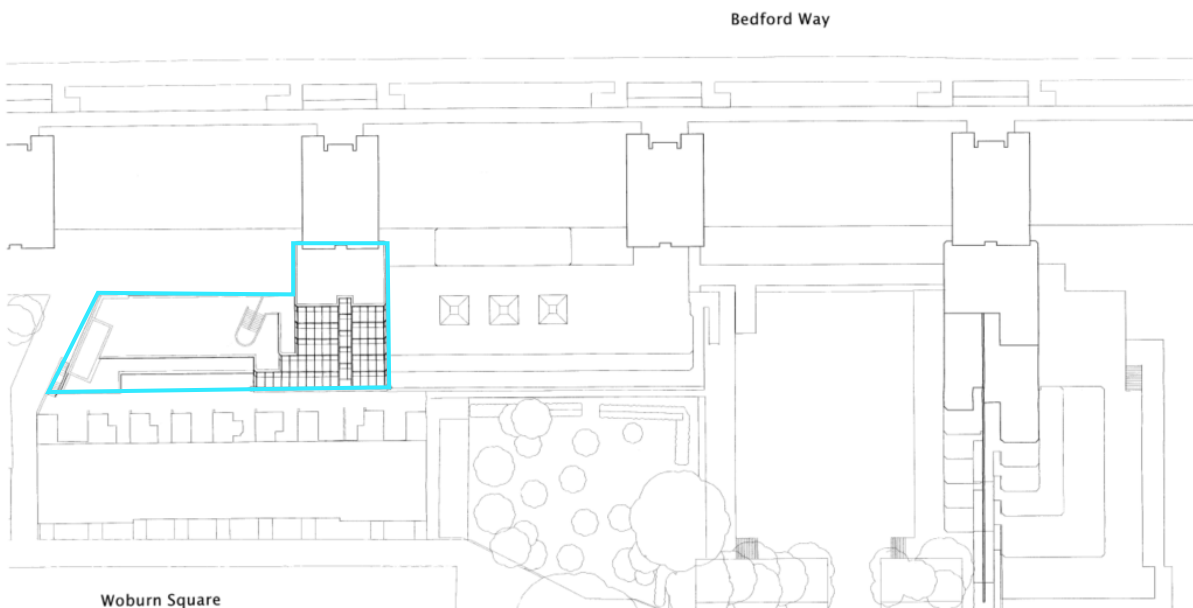




Figure 3: Proposed Plan (Source: Camden Online Planning Application Database, application reference 2008/1237/P).

### Conditions

3.11. Since the grant of the 2009 consents, a number of the attached conditions have been discharged and confirmed by the Council on 30 August 2013.

3.12. Planning permission 2008/1237/P had nine conditions attached. The status of these is confirmed in the table below.

Condition	Subject	Status	Date Approved
1	Time Limit	Compliance	N/A
2	No meter Boxes	Compliance	N/A
3	Plant	Approved	5 June 2013 (ref. 2013/1953/P)
4	Refuse Storage and recycling	Approved	7 November 2012 (ref. 2012/4733/P)
5	Landscaping	Approved	13 November 2012 (ref. 2012/4814/P)
6	Cycle Parking	Approved	12 November 2012 (ref. 2012/4808/P)
7	Security Measures	Approved	11 October 2012 (ref. 2012/4781/P)
8	Overlooking	Approved	12 November 2012 (ref. 2012/4820/P)
9	Balustrading	Approved	7 November 2012 (ref. 2012/4823/P)

Table 1: Conditions of 2008/1237/P

3.13. The Listed Building Consent 2008/1239/L had three conditions. The status of these is set out in the table below:

Condition	Subject	Status	Date Approved
1	Time Limit	Compliance	N/A
2	Internal Finishes	Compliance	N/A
3	Materials	Approved	14 September 2012 (ref. 2012/3098/L)

Table 2: Conditions of 2008/1239/L

3.14. Listed Building Consent 2008/1594/L had two conditions which were compliance only.

### Certificate of Lawfulness of Existing Use of Development (CLEUD)

3.15. On the 30 August 2013, an application made by the IoE for a CLEUD was granted by LB Camden (ref. 2012/6773/P).

## Section 96A Application

3.16. On 11 August 2016, a Section 96a application (NMA) (reference 2016/4176/P) was approved for:

*"Inclusion of condition to list approved drawings granted under reference 2008/1237/P granted on Appeal reference APP/X5210/A/09/02110637 dated 16/12/09 for erection of rear extension (levels 2-9) for educational use in connection with the Institute of Education including provision of offices, teaching and library archive facilities."*

3.17. The S96a application was submitted to enable the submission of this MMA application and was submitted following consultation with the Local Planning Authority.

3.18. As a result of the application, an additional Condition, 10, was added to the original consent. Condition 10 states:

*"The development hereby permitted shall be carried out in accordance with the following approved plans: 1990-MS-100 P1; 06050 - 000 - PL; 06050 - 001 - PL; 06050 - 002 - PL; 06050 - 003 - PL; 06050 - 004 - PL; 06050 - 005 - PL; 06050 - 006 - PL; 06050 - 007 - PL; 06050 - 008 - PL; 06050 - 009 - PL; 06050 - 010 - PL; 06050 - 011 - PL; 06050 - 013 - PL; 06050 - 014 - PL; 06050 - 015 - PL; 06050 - 016 - PL; 06050 - 018 - PL; 06050 - 019 - PL; 06050 - 021 - PL1; 06050 - 022 - PL1; 06050 - 023 - PL1; 06050 - 024 - PL1; 06050 - 025 - PL1; 06050 - 026 - PL1; 06050 - 027 - PL1; 06050 - 028 - PL1; 06050 - 029 - PL1; 06050 - 030 - PL; 06050 - 041 - PL3; 06050 - 042 - PL3; 06050 - 043 - PL3; 06050 - 044 - PL3; 06050 - 045 - PL2; 06050 - 046 - PL2; 06050 - 047 - PL2; 06050 - 048 - PL2; 06050 - 049 - PL2; 06050 - 051 - PL; 06050 - 052 - PL; 06050 - 053 - PL; 06050 - 055 - PL; 06050 - 056 - PL; 06050 - 057 - PL; 06050 - 061 - PL; 06050 - 065 - PL; 06050 - 066 - PL; 06050 - 067 - PL. Reason: For the avoidance of doubt and in the interest of proper planning"*

# 4 Background to the Proposals

## Context

- 4.1. As set out above, the 2009 scheme was implemented and a CLEUD to demonstrate as such was obtained. Furthermore, all pre-commencement conditions were discharged. At this stage the property was owned by the Institute of Education; however, the institute were unable to construct the approved extension.
- 4.2. Since then, UCL have merged with IoE and are keen to construct the approved extension as part of a strategic review of the IoE's wider estate which includes the main 20 Bedford Way building.
- 4.3. The approved, but yet to be constructed, extension offers UCL IoE an excellent opportunity to increase the quantum and quality of teaching and supporting ancillary floorspace within Camden.
- 4.4. UCL is continually seeking to improve its offer to students and staff alike and by doing so improve its competitive standing in the World-wide University rankings. This approach to improving the Bloomsbury Campus has resulted in significant inward investment and improvements into the Bloomsbury Area, for students and staff, as well as visitors and residents, alike.
- 4.5. Despite the eagerness to commence development, UCL are also keen to ensure they will be delivering the optimal design for the new extension.
- 4.6. Therefore, UCL have taken the opportunity to review the approved design thoroughly. Following this critical review, it has been decided that some minor amendments to the approved design will improve energy efficiency, practicality of the extension for the intended use, and the impact of the extension in design terms to the surrounding area and neighbouring buildings.
- 4.7. UCL have retained SEH as architects on the scheme. SEH have worked up revised proposals and engaged with Camden Planning and Design Officers throughout the process.
- 4.8. In order to progress with design changes, it was agreed with Camden Planning Officers that a S96a application was needed for the addition of an 'approved drawings' condition to the original 2009 planning consent. This was approved on 11 August 2016.
- 4.9. This MMA application seeks to make alterations to the 'approved drawings' condition on the recently amended 2009 consent. Therefore, planning permission for the following minor design changes to the 2009 scheme is sought:
  - Stepped spur profile where the approved profile is sloped;
  - A minor amendment to the stairs to increase the width by 400mm;
  - The reintroduction of the cantilever; and,
  - Amendments to the landscaping to include the terraces on the spur.
- 4.10. In recognition that planning policy and building regulations have progressed since 2009, UCL have also reviewed the design in light of National and Local requirements, specifically in relation to the requirements of the conditions.
- 4.11. This application also comprises the re-submission of materials to address previously approved conditions.

4.12. The table below sets out UCL’s position on each of the conditions. It includes the new condition (“condition 10”) which was added as a result of the recently approved S96a application:

<b>Condition</b>	<b>Subject</b>	<b>Status</b>
<b>2008/1237/P</b>		
<b>3</b>	Plant	Details not submitted with this application and will be handled via a new condition.
<b>4</b>	Refuse Storage and recycling	Details not submitted with this application and will be handled via a new condition.
<b>5</b>	Landscaping	A revised proposal for the hard and softlandscaping of the green roof areas has been developed and is shown on the application drawings. However, planting details are not yet confirmed. We expect this condition to be re-attached.
<b>6</b>	Cycle Parking	It is proposed to provide spaces for 68 cycles. Details are included in the application.
<b>7</b>	Security Measures	Details remain unchanged and are included in this submission to prevent the condition from being re-attached.
<b>8</b>	Overlooking	Woburn Terrace opposite is no longer used for student accommodation. Therefore this condition does not need to be re-attached.
<b>9</b>	Balustrading	Details remain unchanged and are included in this submission to prevent the condition from being re-attached.
<b>10</b>	Drawing Numbers	This condition will be updated with new drawing Numbers.
<b>2008/1239/L</b>		
<b>3</b>	Materials	Spur configuration has changed and new material samples will need to be obtained. We expect this condition to be re-attached.

Table 3: Proposed Approach to Conditions

4.13. Overall, the proposed design amendments are considered to be an improvement over the existing scheme. Other benefits of the scheme are discussed in Chapter 6.

### Pre-application Consultation

4.14. A pre-application meeting was held with the London Borough of Camden on the 21 June 2016. At this meeting the principle of revisiting the extant consent and proposed design amendments to it were discussed along with the mechanism to approve them.

4.15. Officers were supportive of the proposals and the scheme has been developed in close discussion with officers.

4.16. Several amenity groups have been notified at pre-application stage and the emerging plans have been shared with them, including the Bloomsbury Conservation Area Advisory Committee, Historic England, The Georgian Group and the 20<sup>th</sup> Century Society has also been carried out. To date, positive responses to the changes have been received by the CAAC and Historic England.

# 5 The Proposals

## Consented Scheme

- 5.1. The consented scheme comprises a new mews building and a new spur building as an extension to the existing IoE building designed by Lasdun.
- 5.2. The mews building will be a four storey extension, the spur building a four storey roof extension on top of the existing IoE library. The spur will attach to the existing stair tower of Lasdun's building.
- 5.3. The Spur has an approved sloped profile facing Woburn Terrace. The image below extracted from the DAS addendum demonstrates the consented spur and mews extensions.



Figure 4: Approved Design of Thornhaugh Mews Extension (Source: DAS Addendum)

## Proposed Scheme

- 5.4. The proposed scheme design is summarised below. Please refer to the application drawings and the DAS Addendum for further detail on the design amendments.
- 5.5. Overall, the amendments result in an increase in floorspace of 430 sqm (GIA).

## Spur Profile

- 5.6. This S73 application is for a design alteration to the profile of the spur. It is proposed to amend the new spur extension to provide a stepped profile with terraces to the south-west elevation at each level rather than a sloped glazed profile.

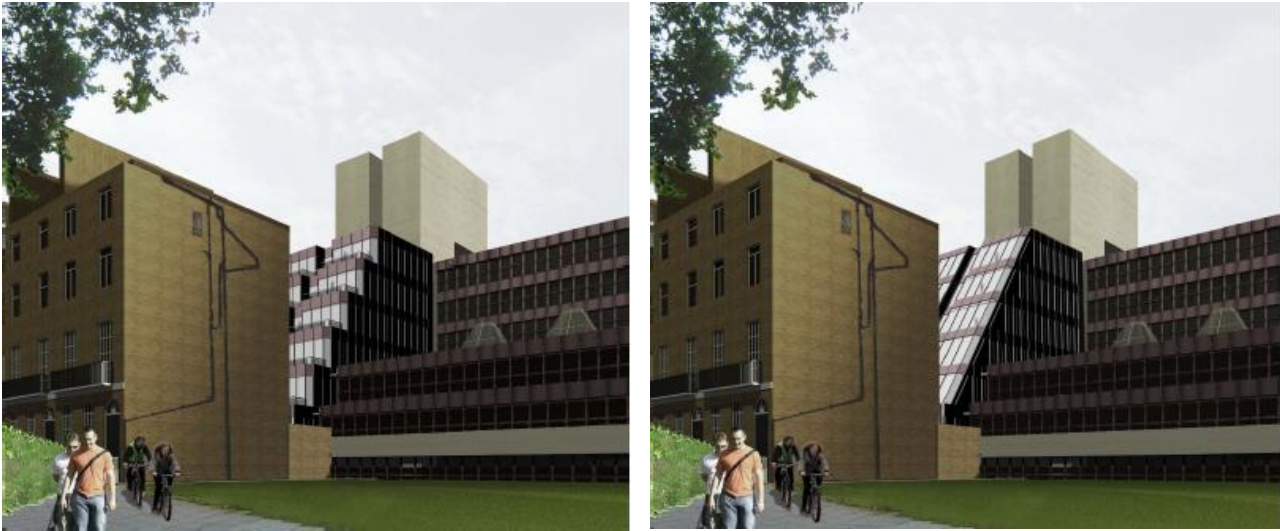


Figure 5: Proposed Design Change to Profile of Spur (Source: DAS Addendum)

### **Reintroduction of Cantilever**

- 5.7. In the new mews building it is proposed to reintroduce a cantilevered portion of building over the service road.

### **Stair Amendments**

- 5.8. The new staircase located at the northern end of the new mews building was originally designed to suit office and library accommodation. However, it is now proposed that the projecting stair tower is widened by 400mm to accommodate teaching accommodation.

### **Landscape Amendments**

- 5.9. The change in profile of the new spur has resulted in a new series of external terraces at level 6 (library roof level) and levels 7, 8 and 9. It is proposed that these are planted with a narrow strip left for maintenance only.

# 6 Policy and Planning Justifications

## Development Plan

6.1. The development plan for the site comprises:

- London Plan (2015);
- Camden Core Strategy (2010) (“CCS”);
- Camden Development Policies (2010) (“CDP”);
- Camden Policies Map (2016); and,
- Site Allocations Plan (2013).

6.2. The Camden Local Plan is currently under examination by the Secretary of State. Therefore some weight has been given to the emerging policies within this document.

6.3. Other material considerations include:

- Camden Planning Guidance 1: Design (2015) (“CPG1”);
- Camden Planning Guidance 3: Sustainability (2015) (“CPG3”); and,
- Bloomsbury Conservation Area Appraisal and Management Plan (2011) (“BCAAMS”).

## Key Planning Considerations

6.4. The following relevant planning considerations are considered below:

- Design Quality;
- Heritage Impact;
- Sustainability and Energy Performance; and,
- Cycle Parking and Transport.

## Design Quality

6.5. CCS Policy CS14 ‘Promoting High Quality Places and Conserving Our Heritage’ requires development to be of a high standard of design and respect local character. It promotes high quality landscaping and works to streets and public spaces.

6.6. CDP Policy DP24 ‘Securing High Quality Design’ requires all development to be of the highest standard of design, and expects developments to consider the character, setting, context, form and scale of neighbouring buildings, the quality of materials used, natural features and landscaping. The policy encourages outstanding design in contemporary or traditional styles. The policy requires development to consider existing rhythms, symmetries and uniformities in the townscape, the compatibility of

materials and their texture, tone and colour, the contribution of a design to views and vistas, and the wider historic environment and features.

6.7. CPG1 states that *"Camden is committed to excellence in design and schemes should consider:*

- *The context of a development and its surrounding area;*
- *The design of the building itself;*
- *The use of the building;*
- *The materials used; and*
- *Public spaces."*

#### **UCL Response**

6.8. The proposed design of the spur is considered to be an improvement over the approved scheme. This is because the form and massing of the spur will be more in-keeping and less prominent against the existing IoE building.

6.9. The addition of the stepped design will also allow for an increased soft landscaped area, improving the outlook for users of the IoE building, and Woburn terrace.

#### **Conservation and Heritage**

6.10. CCS Policy CS14 requires development to respect local character and requires development to preserve and enhance heritage assets.

6.11. CDP Policy DP25 'Conserving Camden's heritage' requires development take account of conservation area statements, appraisals and management plans. Development will only be permitted within conservation areas which preserves and enhances the character and appearance of that area.

6.12. The BCAAMS states that *"high quality new development that is appropriate for its context can preserve or enhance the Conservation Area"*.

6.13. CPG1 states that Camden will *"only permit development within conservation areas that preserves and enhances the character and appearance of the area"*.

#### **UCL Response**

6.14. It is considered that the proposed stepped design on the spur will improve the extensions relationship with both the Grade II\* IoE building and the Grade II listed Woburn Terrace.

6.15. The proposed stepped spur better conveys Lasdun's design rhetoric with greater respect heeded to his wider vision for the building, which included more spurs to match the stepped spur constructed at the southern end of the building.

6.16. The change to a stepped profile would align the appearance of the new spur block more closely with that of Lasdun's only built spur, while its massing and the detailed design of the elevations, otherwise unchanged from the consented and implemented scheme, would continue subtly to distinguish it from both phases of Lasdun's work.

6.17. The subtle differences will emphasise the modern nature of the extension, whilst also outwardly celebrating the spirit in which Lasdun's design was intended to be read. This would make the extension sit more comfortably into the framework of the Lasdun building, and thus be marginally beneficial in terms of its effect on the character and appearance of the grade II\* listed building.



- 6.18. The stepped terraces will also improve the design relationship between the terrace and the spur – with the spur sitting more comfortably in the tight space and seemingly ‘taking a step back’ from the rear elevations of the terraces.
- 6.19. Overall, the stepped design looks less imposing against the Georgian Terrace, and more in keeping with the existing IoE building.
- 6.20. The slight reduction in enclosed volume would be marginally beneficial in relation to the setting of the back of the Grade II listed terrace in Woburn Square.
- 6.21. The amended design is also considered to improve the scheme’s relationship to the Bloomsbury Conservation Area. With a design more in keeping with this particular character area: Sub-area 3 ‘University of London/British Museum’, ‘Southern University area’. This area is described in the BCAAMP as “*consist[ing] of predominantly 20th century redevelopments which were part of the expansion of the University of London on land cleared for this purpose to the north of Montague Place. The area is now home to a number of notable modern 20th century buildings*”.
- 6.22. The BCAAMP specifically mentions the IoE building stating:
- “The rear library extension to SOAS known as the Philips Building, and the Institute of Education (grade II listed) are seen as a group in views from Torrington Square, Woburn Square and Thornhaugh Street. Both by Denys Lasdun, they share a common vocabulary derived from the postwar British Brutalist architecture: stark concrete, strongly modelled structures with horizontal glazing, and distinct sculptural forms including vertical circulation towers. While radical interventions in the Bloomsbury townscape, the Lasdun buildings are now part of the established character of the Conservation Area”.*
- 6.23. Of particular note is the BCAAMPS reference to the character of the area being defined by the horizontal glazing. The proposed design amendment will therefore contribute to the character of this part of the Bloomsbury Conservation Area, where the previous sloped glazing design was less sympathetic.
- 6.24. For the above reasons the amendments would also have a marginally beneficial effect on the character and appearance of the Bloomsbury Conservation Area.
- 6.25. The impact on views within the Conservation Area has also been considered. The stepped design will not impact on the views within the Conservation Area over what is already consented. However, we consider that there will be an improvement to the views of the building overall, with the stepped design likely to be less prominent in views of the main IoE building.
- 6.26. It also offers a number of other benefits as set out below.

## **Sustainability**

- 6.27. CCS Policy CS13 ‘Tackling climate change through promoting higher environmental standards’ requires all new developments to take measures to minimise the effects of and adapt to climate change and meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 6.28. CDP Policy DP22 ‘Promoting Sustainable Design and Construction’ states that “The Council will require development to incorporate sustainable design and construction measures”. The Council expects non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” from 2016 where previously.

## UCL Response

- 6.29. Since the 2009 consent, National Legislation as well as Camden’s local requirements for Sustainability measures have become more stringent. The proposal must now comply with Part L of the Building Regulations (2013).
- 6.30. Additionally, UCL’s target BREEAM rating of Excellent (see below) requires that the operational CO2 emissions are at least 30% lower than the Building Regulations requirement.
- 6.31. Given this, the design has been re-tested in terms of its energy performance and overall sustainability. It has been found that the design change to the profile of the spur will improve thermal performance by reducing solar gain. In addition, it is proposed that some of the glazing on the south west façade of the spur will become opaque to further combat solar gain.
- 6.32. A Pre-Assessment has been carried out for the revised design indicating how it is anticipated that the ‘Excellent’ rating will be achieved. A copy of the pre-assessment accompanies this application.
- 6.33. Overall, the design amendments will improve environmental performance over the approved scheme.

## Amenity

- 6.34. Policy DP26 ‘Managing the impact of development on occupiers and neighbours’ also resists development that will cause harmful effects on the amenity of occupiers and nearby properties. This includes visual outlook, noise and vibration.
- 6.35. Policy DP28 ‘Noise and Vibration’ states that the Council will only grant permission for plant or machinery if it can be operated without causing harm to amenity and does not exceed Camden’s noise thresholds.

## UCL Response

- 6.36. In 2009, the consents were granted with the understanding that some student residential accommodation was in use in Woburn Terrace. As a result, Condition 8 was applied to the 2009 consents which sought to mitigate against overlooking.
- 6.37. Since 2009, the student accommodation in Woburn Terrace has fallen out of use. The use of each of the terraces is set out below:
- No. 10 – academic office space (in use);
  - No. 11 –Basement to 2nd floor is academic office space (in use), 3rd floor - unoccupied flat;
  - No. 12 – residence - closed under security protocol;
  - No. 13 – residence - closed under security protocol;
  - No. 14 – residence – closed, final decant to be completed prior to being placed under security;
  - No. 15 – academic office space, imminent academic redevelopment (Confucius – UPO Rosemary Clements);
  - No. 16 – academic office space closed under security protocol;
  - No. 17 – closed, final decant to be completed prior to being placed under security; and,
  - No. 18 – academic office space (in use).
- 6.38. The office spaces are occupied during normal working hours.
- 6.39. Therefore, the overlooking of residential properties will not be an issue with the revised scheme. Furthermore, UCL have no intention of re-implementing the student accommodation use in the terrace.

**Cycle Parking**

6.40. Since the 2009 consent, the London Plan has set out new cycle parking requirements for new development.

6.41. For Class D1 development, the London Plan requires the following:

<b>Use</b>	<b>Long Stay Cycle Parking</b>	<b>Short Stay Cycle Parking</b>
<b>D1 – Universities and Colleges</b>	1 space per 4 staff + 1 space per 20 FTE students	1 space per 7 FTE students

**UCL Response**

6.42. It is proposed that 68 cycle parking spaces comprising 34 Sheffield Stands are located on the service road which runs beneath the library. This is the policy compliant number based on the anticipated occupancy of the scheme of 184 academic staff and 110 students

**Transport**

6.43. As part of the 2009 consents, a transport statement was prepared by Capita Symonds. This document set out the proposed trip generation and assignment of pedestrian routes.

6.44. The proposed minor design amendment will result in a very minor uplift in floorspace of 430 sqm. It is therefore not considered that the amendment will impact the local transport network over and above the 2009 consent.

6.45. Apart from an increase in cycle parking provision, as set out above, there are no other design amendments relating to Transport proposed.

6.46. An updated transport statement is therefore not included within this MMA application.

# 7 Variation of Conditions

- 7.1. The proposals comprise a S73 application and corresponding LBC application.
- 7.2. The S73 application seeks approval for a number of minor design alterations to the main 2009 consent as set out in Section 5.
- 7.3. The S73 application also seeks consent to vary the wording of specific conditions of the 2009 consent in order to vary the trigger for their discharge, as discussed with LBC officers
- 7.4. The table below sets out the proposed trigger for each of the conditions attached to the S73 application. It is proposed that a variation of the wording will amend the trigger point of the relevant conditions.

No.	Existing Condition Wording	Proposed Variation to Condition Wording
1	The development hereby permitted shall begin not later than three years from the date of this decision.	Compliance only, no change proposed.
2	No meter boxes, flues, vents, pipes or satellite dishes shall be fixed or installed on external elevations of any of the buildings hereby approved without the prior written consent of the local planning authority.	Compliance only, no change proposed.
3	No development shall commence until details of plant (including an acoustic report, sound attenuation and acoustic isolation from the structure) to be installed externally as part of the development have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with such approved details, including specified maximum noise levels, and thereafter maintained for as long as the development remains in existence.	<b>The development shall not be occupied</b> until details of plant (including an acoustic report, sound attenuation and acoustic isolation from the structure) to be installed externally as part of the development have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with such approved details, including specified maximum noise levels, and thereafter maintained for as long as the development remains in existence.
4	No development shall commence until details of refuse storage and recycling areas serving the development have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with such details and maintained as such for as long as the development remains in existence.	<b>Prior to the implementation of relevant works</b> , details of refuse storage and recycling areas serving the development have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with such details and maintained as such for as long as the development remains in existence.
5	No development shall commence until details of all hard and soft landscaping (including all planting, green & brown roofs, trees, all hard surfaces and seating) on the site have been submitted to and approved in writing by the local planning authority and shall be carried out in accordance with such approved details no later than the end of the first planting season following completion of the development or any phase of the development. Any trees or areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, no later than the end of the following planting season, with others of similar	<b>Prior to implementation of relevant works</b> , details of all hard and soft landscaping (including all planting, green & brown roofs, trees, all hard surfaces and seating) on the site have been submitted to and approved in writing by the local planning authority and shall be carried out in accordance with such approved details no later than the end of the first planting season following completion of the development or any phase of the development. Any trees or areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, no later than the end of the following planting season, with others of similar size, and species, unless

	<p>size, and species, unless the Council gives prior written consent to any variation. The landscaping details shall include those to the following areas:</p> <p>A) Green and brown roof to proposed extension (including management details)</p> <p>b) Proposed mews/courtyard area between the proposed extension and the rear of 10-18 Woburn Square</p> <p>c) Details of measures to promote biodiversity, including bird and bat boxes plus any other similar such measures.</p>	<p>the Council gives prior written consent to any variation. The landscaping details shall include those to the following areas:</p> <p>A) Green and brown roof to proposed extension (including management details)</p> <p>b) Proposed mews/courtyard area between the proposed extension and the rear of 10-18 Woburn Square</p> <p>c) Details of measures to promote biodiversity, including bird and bat boxes plus any other similar such measures.</p>
6	<p>No development shall commence until details of cycle parking areas (including full details of the proposed racks/housings themselves) sufficient to accommodate a minimum of 20 bicycles have been submitted to and approved in writing by the local planning authority. The development shall be implemented in accordance with such approved details and these facilities shall be available for use prior to occupation of the development and shall be retained for as long as the development remains in existence.</p>	<p><b>The development shall not be occupied</b> until details of cycle parking areas (including full details of the proposed racks/housings themselves) sufficient to accommodate a minimum of 20 bicycles have been submitted to and approved in writing by the local planning authority. The development shall be implemented in accordance with such approved details and these facilities shall be available for use prior to occupation of the development and shall be retained for as long as the development remains in existence.</p>
7	<p>No development shall commence until details of security measures including security/entrance gates, external lighting, lighting to entrance areas, windows, entrances and other related measures have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with any such approved measures.</p>	<p>Information submitted in support of the S73 application. Therefore we do not expect this condition to be re-attached.</p>
8	<p>Notwithstanding the drawings hereby approved, no development shall commence until detailed drawings have been submitted to and approved in writing by the local planning authority, showing details of measures (e.g. obscure glazing, screening or other appropriate measures) to prevent potential intrusive overlooking from the proposed extension into rooms of adjoining premises at 26 Bedford Way. The development shall be carried out in accordance with any such approved details and shall remain as such for as long as the development remains in existence.</p>	<p>Notwithstanding the drawings hereby approved, <b>the development shall not be occupied</b> until detailed drawings have been submitted to and approved in writing by the local planning authority, showing details of measures (e.g. obscure glazing, screening or other appropriate measures) to prevent potential intrusive overlooking from the proposed extension into rooms of adjoining premises at 26 Bedford Way. The development shall be carried out in accordance with any such approved details and shall remain as such for as long as the development remains in existence.</p>
9	<p>Notwithstanding the details of the proposed glazed balustrade at levels five and six (enclosing the roof terraces) indicated on the drawings of the development hereby permitted, no development shall commence until full details of a balustrade have been submitted to and approved in writing by the local planning authority and thereafter the development shall be carried out in accordance with the details approved by the local planning authority.</p>	<p>Information submitted in support of the S73 application. Therefore we do not expect this condition to be re-attached.</p>
10	<p><i>The development hereby permitted shall be carried out in accordance with the following approved plans: 1990-MS-100 P1; 06050 - 000 - PL; 06050 - 001 - PL; 06050 - 002 - PL; 06050 - 003 - PL; 06050 - 004 - PL; 06050 - 005 - PL; 06050 - 006 - PL; 06050 - 007 - PL; 06050 - 008 - PL; 06050 - 009 - PL; 06050 - 010 - PL; 06050 - 011 - PL; 06050 - 013 - PL; 06050 - 014 - PL; 06050 - 015 - PL; 06050 - 016 - PL; 06050 - 018 - PL; 06050 - 019 - PL; 06050 - 021 - PL1; 06050 - 022 - PL1; 06050 - 023 - PL1; 06050 - 024 - PL1; 06050 -</i></p>	<p>This condition will be amended to list the new drawing numbers.</p>

*025 - PL1; 06050 - 026 - PL1; 06050 - 027 - PL1;  
06050 - 028 - PL1; 06050 - 029 - PL1; 06050 - 030 -  
PL; 06050 - 041 - PL3; 06050 - 042 - PL3; 06050 - 043  
- PL3; 06050 - 044 - PL3; 06050 - 045 - PL2; 06050 -  
046 - PL2; 06050 - 047 - PL2; 06050 - 048 - PL2;  
06050 - 049 - PL2; 06050 - 051 - PL; 06050 - 052 - PL;  
06050 - 053 - PL; 06050 - 055 - PL; 06050 - 056 - PL;  
06050 - 057 - PL; 06050 - 061 - PL; 06050 - 065 - PL;  
06050 - 066 - PL; 06050 - 067 - PL. Reason: For the  
avoidance of doubt and in the interest of proper  
planning*

Table 4: Proposed Condition Wordings

## 8 Conclusion

- 8.1. This statement has been prepared in support of a S73 and LBC application to amend the design of the approved 2009 scheme for an extension at Thornhaugh Mews. The design amendments are also accompanied by a listed building application to formalise the changes.
- 8.2. The 2009 scheme was implemented (a CLEUD has been obtained) and all conditions were discharged where required. However, the extension was not constructed.
- 8.3. Since then, the ownership of the IoE building has changed, with UCL merging with the IoE.
- 8.4. UCL are keen to build out the approved extension as soon as possible, as part of a strategic review of the IoE's estate and the opportunity to help meet the need for new teaching and learning space for the IoE.
- 8.5. However, UCL have taken the opportunity to review the approved design and have decided that some minor design amendments will improve the design, energy efficiency and practicality of the extension.
- 8.6. UCL have worked up revised proposals and have engaged with Camden Planning and Design Officers during this process.
- 8.7. In order to progress with design changes, it was agreed with Camden Planning Officers that a S96a application needed to be submitted to add an 'approved drawings' condition to the original 2009 planning consent. This was approved on the 11 August 2016.
- 8.8. The S73 application seeks to make alterations to the 'approved drawings' condition on the recently amended 2009 consent. Therefore, planning permission for the following minor design changes to the 2009 scheme is sought:
  - Stepped spur profile where the approved profile is sloped;
  - A minor amendment to the stairs to increase the width by 400mm;
  - The reintroduction of the cantilever; and,
  - Amendments to the landscaping to include the terraces on the spur.
- 8.9. This Statement has considered the design amendments in light of up to date local policy. It is considered that the key policy areas, design, heritage, sustainability and cycle parking are satisfied.
- 8.10. In recognition that planning policy and building regulations have progressed since 2009, UCL have also reviewed the design in light of National and Local requirements, specifically in relation to the requirements of the conditions.
- 8.11. Therefore, this application also comprises the re-submission of materials to address previously approved conditions.
- 8.12. Overall, the proposed design amendments are considered to be an improvement over the existing scheme and for this reason, it is considered that consent should be granted.



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