



**Institute of Education, 20 Bedford
Way**
Planning Statement

3 May 2017

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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 an application for listed building consent for internal alterations at 20 Bedford Way (also known as the Institute of Education), WC1H 0AL (“the site”). The application is seeking listed building consent for:

“A new lift serving levels 2-4 within the west wing, and internal alterations and refurbishment works at levels 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”.

- 1.2. The proposals comprise Phase 1 of a wider site-wide series of works at 20 Bedford Way, which UCL have developed since merging with, and obtaining the long leasehold of, the building from University of London (UoL) in 2008.
- 1.3. The building comprises circa 27,000 sqm of Class D1 (higher education) floorspace. In its existing condition the building is tired and out-dated. It suffers from a range of issues including poor circulation, poor accessibility of some areas of the building, poor thermal control and inefficient organisation of internal spaces.
- 1.4. This listed building application is seeking consent for internal alterations only, including the reconfiguration of internal layout, a revised servicing strategy and a new lift. The proposals aim to address the key issues that the building currently suffers and thereby improve its effectiveness and efficiency and the overall student experience. The proposals will also allow for the provision of much needed new teaching and learning spaces for UCL through the rationalisation of the building.

Application Documents

- 1.5. The application comprises:
 - Application forms, certificates and notices;
 - Covering letter;
 - Planning Statement;
 - Architectural drawings including existing, demolition and proposed elevations, floorplans and sections;
 - Design and Access Statement;
 - Mechanical and engineering drawings including electrical, mechanical and public health services.
 - Heritage Statement;
 - BREAAAM Report;
 - Interim Sustainability Report;
 - Fire Strategy;
 - Accoustic Survey; and,
 - Structural Statement and accompanying structural drawings.

Structure of Planning Statement

1.8. The remainder of this planning statement sets out the site context, the background to the application, the planning policy framework, key policies and how the scheme meets these.

1.9. This statement comprises the following chapters:

- Chapter 1: Site context – This chapter describes the site, its location and surroundings.
- Chapter 2: Background to Application – This chapter sets out the need for the application and the objectives of the proposals.
- Chapter 3: Pre-application Consultation – This chapter outlines the pre-application consultation that has taken place prior to submission of the application.
- Chapter 4: The Proposals – This chapter describes the proposals.
- Chapter 5: Pre-application consultation – This chapter sets out the pre-application consultation with London Borough of Camden and Historic England to date.
- Chapter 6: The Development Plan – This chapter sets out the Development Plan against which the proposals will be assessed in Chapter 6.
- Chapter 7: Policy Justifications – This chapter assesses the proposals against the Development Plan and relevant policies.
- Chapter 8: Conclusions – This chapter concludes the Planning Statement.

2 Site Context

Site Location

- 2.1. The Site is located on Bedford Way in the London Borough of Camden. It is bounded to the north by Gordon Square, to the east by Bedford Way and the Royal National Hotel, to the south by Russell Square and to the west by the School of Oriental and African Studies (SOAS), another Lasdun designed building.
- 2.2. The site is located within Sub-area 3 of the Bloomsbury Conservation Area 'University of London / British Museum'. To the west of the site are the Grade II listed Woburn Terraces and Gordon Square Terraces to the north and the Grade II* listed SOAS and Grade II listed Russell Square terrace to the south.
- 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 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.

The surrounding area

- 2.5. 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 and office uses in the surrounding area. The immediate surrounding buildings are generally in D1 use and occupied by Higher Education providers, such as UCL, UoL and SOAS.
- 2.6. 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.

Site Description

- 2.7. The site comprises part of the Grade II* listed former Institute of Education Building. The building was designed by Architect Sir Denys Lasdun and Partners and completed in 1977.
- 2.8. The listing description states:

"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."

- 2.9. 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 (CLIE) 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.

- 2.10. The main elevation fronts Bedford Way. However, there are both front and rear entrances to the building which are both in full use accessed via Bedford Way and Woburn Square and enter lower and upper ground levels respectively.
- 2.11. The building comprises an imposing glazed and concrete façade with five distinct core towers and a projecting wing to the rear off of Core tower A. It contains nine levels, three below ground and six above.
- 2.12. This listed building consent application relates to 20 Bedford Way only, and specifically levels 2, 3 and 4 of the west wing and, in the main building, the floor plate between cores B and C also at third floor level.

Planning History

- 2.13. The site has an extensive planning history.
- 2.14. The most recent application in its history was the amendment to the 2008 planning and listed building consents (reference 2008/1237/P and 2008/1239/L) for the erection of a new spur extension to the rear of the building (reference 2016/5738/L and 2016/5639/P). The amendments sought under the latest applications included the changing of the profile of the proposed extension from sloped to stepped. The applications were approved in December 2016.
- 2.15. Other recent applications have been for minor works only, such as listed building consents for minor amendments to the internal layout of the building, advertisement consents for new signage and planning permission for new servicing.
- 2.16. The building has also been subject to a listed building consent application for the installation of secondary glazing. Application 2013/2452/L gained listed building consent in 2013 for: *“Installation of internal secondary glazing to 4th, 5th, 6th, 7th, 8th & 9th floor level windows”*.

3 Background to Application

Project Background

- 3.1. 20 Bedford Way comprises a large building of circa 27,000 sqm of D1 and associated ancillary floorspace. UCL merged with the existing occupiers, the Institute of Education, in 2014. This recent merger has provided further opportunity for UCL to continue delivering the aims of its masterplan across the wider Bloomsbury Estate.
- 3.2. As the new occupier and long term custodian of this Grade II* listed building, and with the aims of the Bloomsbury Masterplan in mind, UCL are now seeking to make improvements to the building.
- 3.3. Currently, it is considered that the building is in a poor state of repair and is underutilised. The building also contains legacies of projects implemented at specific times to address specific issues, and there has been a clear lack of site wide visioning and a holistic approach.
- 3.4. Therefore, UCL are currently carrying out a wider master-planning process for the building. This holistic approach to the building will allow 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.
- 3.5. With circa 27,000 sqm of D1 floorspace, the building presents significant opportunities for UCL to provide both improved and new teaching and learning spaces, through refurbishment and reconfiguration of the existing building.
- 3.6. Notwithstanding the opportunity the existing building presents, UCL have also recently received revised planning and listed building consent for the Thornhaugh Mews extension, which will comprise 2,500 sqm of new floorspace at the north end of the building.
- 3.7. Given the above, UCL has demonstrated considerable commitment and investment to improving and refurbishing the building, in order to ensure its longevity into the 21st Century.
- 3.8. Through the refurbishment and improvement works at 20 Bedford Way, UCL aim to:
 - Address historic issues of the building through a comprehensive master-planning approach, rather than continuing to address individual issues on an individual basis.
 - Bring the building up to date through a comprehensive refurbishment programme. This will ensure the longevity of the building into the 21st Century whilst ensuring that it remains functional in a new era of Higher Education;
 - Deliver outstanding student experience through delivering high quality teaching, learning and socialising spaces. In an increasingly competitive arena, UCL must ensure that it provides the quality of spaces that existing students expect, and maintain its competitiveness in order to attract the best new students in the future.
 - Deliver a range of flexible teaching spaces which will accommodate the requirement to adapt according to future demand. This approach conforms to Lasdun’s original design concept for the building, one of flexibility and adaptability based on the grid structure of the building.
 - Support the growth in student population through the unlocking of new teaching and learning spaces and the provision of new student facilities in this currently underutilised building.
 - Improve the environmental performance of building whilst maintaining its character and significance. UCL will seek to make sympathetic interventions into the building fabric to

improve its thermal and performance and energy consumption, overall improving the sustainability of the 1970's building and the working environment for its users.

- Improving the accessibility for all users in all parts of the building. UCL realise the urgency to improve the accessibility within the lower level of the wings and will seek to address this within Phase 1 of the refurbishment works. UCL will also seek to reconfigure spaces to ensure user friendly circulation.
- Identify any emerging building fabric issues such as water ingress, or degradation as a result of age. UCL recognise the historic significance of this building and will seek to take action to preserve this asset for the enjoyment of future generations of students, staff and the public alike.

A Phased Approach

- 3.9. Despite the need for refurbishment, UCL must also approach the master-planning of the building practically, recognising that the existing building does provide 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 D1 floorspace already due to a number of other refurbishment projects on its Bloomsbury Campus.
- 3.10. Consequently to limit disruption to the existing D1 provision and pressure on already encumbered D1 floorspace elsewhere on Campus, UCL have taken a phased approach to the implementation of the master-planning works at 20 Bedford Way.
- 3.11. This listed building consent application relates to Phase 1 of the refurbishment and improvement works only.
- 3.12. Following the master-planning process and significant investigation into the condition of the building, UCL is proposing 5 years of works across four phases to refurbish and optimise 20 Bedford Way. The works include a complete replacement of the mechanical and electrical services, as well as a re-configuration of internal spaces to optimise teaching and learning spaces. Once the refurbishment works are complete, the IoE building will deliver new teaching and learning spaces within the wider Bloomsbury Campus.
- 3.13. The most effective and sustainable programme to deliver the IoE refurbishment project is a phased scheme that prioritizes structural and service improvements to the building in the early phases, with provision of new teaching space being delivered during the later phases. The proposed Phase 1 mechanical and engineering works will help enable the following phases.
- 3.14. This phased approach will also limit the impact and disruption to the existing student experience and provision of teaching and learning facilities, where existing provision is already under considerable pressure.
- 3.15. Phase 1 seeks to unlock a significant quantum of underutilised and inefficient floorspace from floors 2 to 4 whilst updating existing mechanical services.
- 3.16. It will unlock spaces that are currently underutilised, which will help to alleviate pressure on existing D1 floorspace once later phases come forward.

Enabling Works

- 3.17. Prior to the submission of this application for Phase 1, a package of enabling works was discussed with Camden and Historic England in February 2017. These enabling works comprised the strip-out of the areas of the building to which Phase 1 relates. They included the removal of non-original partitions and internal fabric as well as asbestos.
- 3.18. A package of demolition drawings and overlay drawings which demonstrated how little of the remaining internal partitions were original, were prepared by the Heritage Consultants, Alan Baxter Associates.

- 3.19. Given the minimal impact to historic fabric, it was agreed with LB Camden that the strip-out and enabling works could commence without the need for listed building consent.
- 3.20. The next Chapter sets out the proposals comprising Phase 1 of the refurbishment works, for which this application seeks listed building consent.

4 The Proposals

Description of Development

4.1. This application is seeking listed building consent for:

"A new lift serving levels 2-4 within the west wing, and internal alterations and refurbishment works at levels 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".

4.2. The proposals relate to two distinct areas of the building:

- Levels 2-4 of the wing adjoining Core A; and,
- Level 3 between Cores B and C.

4.3. The proposals comprise refurbishment and redecoration works, reconfiguration of the internal layout as well as the insertion of a new lift between levels 2 and 4 within the west wing and new servicing arrangements. The proposals are also seeking to install new secondary glazing and replace existing secondary glazing.

Description of Proposals

Lift

4.4. Within the west wing off Core A, it is proposed that a new lift shaft is installed between levels 2 and 4.

4.5. Currently accessibility between floors is poor in this area of the building. The lift will be located in the corner of the wing closest to the main body of the building and next door to the main entrance to the wing. From here it will be visible and easily accessible.

4.6. The exact detail of the design of the lift has not yet been developed. It is anticipated that detailed design is developed following grant of listed building consent, and that this would be secured via condition at a later stage.

4.7. A structural report has been included with this application to demonstrate the physical feasibility of the insertion of the lift core.

Glazing

4.8. It is proposed that the existing roof lights will be replaced like for like on the wing of level 3. Planning consent is not required given the like for like nature of the replacement.

4.9. Internal secondary glazing is proposed where windows are only single glazed, and where existing secondary glazing is already installed, this will be replaced. This is clearly demonstrated on the proposed architectural drawings and within the Design and Access Statement. This will considerably improve the thermal control, noise impacts and energy efficiencies of the building, creating an improved environment for users. The installation of secondary glazing minimises the level of intervention required to the façade and addresses the issue without impacting the significance of the external façade.

Reconfiguration

4.10. 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.

4.11. The proposals are seeking to remove existing internal partitions and re-arrange the internal spaces to create new teaching floorspace, offices and social areas. The newly configured spaces will utilise the existing modular grid structure of the building.

4.12. Within the west wing, at level 2, it is proposed that a social hub is created to include the student union and bar, social break out areas, new toilets and facilities such as kitchens and tea points,

and some multi-function rooms. There will also be a back office area for UCL's facilities management.

- 4.13. At level 3, a new teaching area will be created, including the provision of two new lecture theatres, with smaller teaching rooms of varying capacity and a central communal area for group learning and working.
- 4.14. At level 3 between Core B and C, new flexible teaching spaces will be created, again of varying capacities arranged off of the central spinal corridor of the building.

Refurbishment and Redecoration

- 4.15. As part of the above works, the spaces will undergo intensive refurbishment and redecoration works, including the installation of new flooring and replacement ceilings, painting and furnishings.

5 Pre-application Consultation

- 5.1. The application has been subject to formal pre-application discussions with the London Borough of Camden and Historic England in April 2016 and February 2017.

Principle of Refurbishment Works

- 5.2. 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.
- 5.3. At this meeting, the principles of refurbishment works and internal reconfiguration were discussed. Key areas of significance were highlighted by the officer, including the stair core and central spinal corridors.
- 5.4. The principle of reconfiguration was accepted.

Enabling and Strip-out works

- 5.5. A second meeting with the Design and Conservation Officer at LB Camden and Historic England was held on the 23 February 2017 once proposals had been further defined.
- 5.6. At this meeting, the enabling works were discussed in detail. Following the meeting, demolition plans and overlay drawings were provided to officers to demonstrate the limited original fabric that would be impacted by the proposals.
- 5.7. It was agreed with both the LPA and Historic England that the strip out works could commence without the need for listed building consent.
- 5.8. Discussion with the LPA during the design development has been ongoing.

6 The Development Plan

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

National Planning Policy Framework

6.2. The National Planning Policy Framework (NPPF) (2012) is the overarching planning policy document for England.

6.3. The NPPF sets out a presumption in favour of sustainable development, which is described as a “golden thread running through plan-making and decision-taking”. Sustainable development is about positive growth – making economic, environmental and social progress for this and future generations and the NPPF explains that development that is sustainable should go ahead without delay.

The Development Plan

6.4. 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.

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

- The London Plan (FALP 2016);
- Camden Core Strategy (2012); and
- Camden Development Management Policies (2010).

6.6. The following documents will be material considerations:

- Bloomsbury Conservation Area Appraisal and Management Strategy (2011);
- Camden Planning Guidance 1: Design (2015), 3: Sustainability (2015);
- The National Planning Policy Framework (NPPF) (2012); and
- Draft Camden Local Plan (2016).

Site Allocations

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

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

7 Policy Assessment

Introduction

7.1. This section assesses the proposals against the following key policy areas:

- Land Use;
- Heritage and Design; and,
- Sustainability.

Land Use

7.2. London Plan Policy 2.1 'London in its Global, European and United Kingdom Context' will support proposals and policies that retain and extend London's global role as a sustainable centre for a range of sectors, including education, whilst policy 2.10 'Central Activities Zone – Strategic Priorities' outlines the need to "enhance and promote the unique international, national and London-wide roles of the Central Activities Zone (CAZ)". Map 2.3 identifies the area as mixed use with a strong academic character.

7.3. Policy CS9 'Achieving a Successful Central London' of the Core Strategy outlines the Council's aims to support the Central London area of Camden. This includes supporting Central London as a focus for Camden's growth, and ensuring development in Central London and the growth areas of King's Cross and Euston contributes to London's economic, social and cultural role.

7.4. Policy CS10 'Supporting community facilities and services' promotes the need to support the higher education sector in Camden, whilst ensuring developments are sensitive to their surroundings.

7.5. Camden's draft Local Plan also seeks to support the concentration of educational institutions within Central London that form an integral part of the knowledge quarter. Draft Local Plan policy C2 'Community facilities, culture and leisure' sets out that Camden will support the Higher Education sector and balance its requirements with those of other sectors in the local community. The draft policy states:

"In assessing applications for further and higher education use, the Council will ensure that such developments are sensitive to their surroundings, take into account the cumulative impact on the balance and mix of uses in the area, the contribution made to the 'knowledge quarter' and protect residential uses, the local environment and the amenity of, and services for, the residential community and other users of the area and their future needs".

Applicant's Response

7.6. The proposals are for internal works only to an existing educational building in an area surrounded by similar institutional and higher educational uses. Therefore it is considered that the proposals are suitable and will not impact on residential uses or their amenity and services.

7.7. The proposals will optimise the existing spaces on levels 2-4 of the west wing and level 3 between Cores C and B. The proposals will create improved teaching and learning facilities, lecture theatres and social break-out areas in a currently under-utilised area of the building. The proposals are not considered to result in a significant increase in capacity of the building. The proposals seek only to re-purpose existing D1 floorspace.

7.8. The proposals will optimise the existing D1 floorspace within the building, thereby supporting the provision of high quality teaching and learning floorspace expected of UCL and its renowned Bloomsbury Campus. 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.

7.9. The proposals are a sustainable response to the recent and increasing pressures on D1 floorspace within the wider UCL Bloomsbury Campus, where the proposals seek to optimise existing floorspace with limited impact on other occupiers and users of the surrounding area.

Heritage and Design

7.10. Paragraph 131 of the NPPF sets out three criteria that Local Authorities should take into account when determining applications:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

7.11. Paragraph 132 advises that when considering the impact of a proposed development on the significance of a designated heritage asset “great weight” should be given to the asset’s conservation. It clarifies that the more important the asset, the greater the weight should be and any harm or loss should require clear and convincing justification.

7.12. Paragraph 134 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

7.13. London Plan Policy 7.6 ‘Architecture’ states that:

“Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.”

7.14. Policy 7.8 ‘Heritage Assets and Archaeology’ notes that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. This Policy also ensures development identifies values, conserves, restores, re-uses and incorporates heritage assets, where appropriate.

7.15. Policy CS5 ‘Managing the impact of growth and development’ highlights the need to ensure development meets the needs of Camden’s population, is sustainable and in spaces of the highest quality, and contributes to enhancing the environment and heritage. The impact of developments on their occupiers and neighbours is too considered.

7.16. Policy CS14 of the Camden Core Strategy and Policy DP25 of the Camden Development Policies document require development to preserve and enhance heritage assets and their settings.

7.17. 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.

7.18. The NPPF, London Plan and local policies will require development to be of high quality design. The NPPF sets out in paragraph 56 that:

“good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”.

Applicant’s Response

Reconfiguration

7.19. The proposals seek to make internal alterations to the Grade II* listed building only. The proposals seek to reconfigure the floorspace at levels 2-4 of the west wing and floor 3 between Core B and C. This includes the removal of existing partitions and installation of new partitions.

7.20. As aforementioned, the proposals have been subject to detailed pre-application discussions with Camden’s Planning and Conservation Officers, as well as Historic England. At these discussions and site visits, it was confirmed that the existing partitions (within the relevant areas of the building subject to this application) had little to no architectural interest or historic significance. The partitions were not original and retained little of the Historic layout, as demonstrated on

overlay drawings provided by the heritage consultant, Alan Baxter Associates, at the pre-application stage.

- 7.21. The Heritage Statement submitted in support of this application and prepared by Alan Baxter Associates sets out that the removal of internal partitions and subsequent reconfiguration of the floorspace is justified by the benefit of creating improved teaching, learning and administration spaces.
- 7.22. The building was originally designed by Lasdun for D1 use, for the occupation by the Institute of Education. The proposals will therefore allow for the continued use of the Heritage Asset's for its optimum viable use.
- 7.23. The proposals have been developed with Lasdun's original vision in mind, to allow for future flexibility through reconfiguration as UCL's requirements as a Higher Education provider change over time. The proposals have sought this flexibility whilst staying true to Lasdun's linear design features, for example maintaining the spinal corridor on level 3 between cores B and C.

Glazing

- 7.24. The proposals include the installation of secondary glazing where existing windows are single glazed and replacement of secondary glazing where it is already in place. The secondary glazing will be installed sympathetically within the building. Exact fixing details are to be confirmed at a later date.
- 7.25. It is considered that this proposal will improve the quality of teaching and learning spaces within the building by improving internal climate control, as well as thermal performance and energy efficiency. The proposals will not impact the appearance of the external elevation.
- 7.26. The Heritage Statement considers this proposal to result in less than substantial harm that is outweighed by the benefits of significantly improving environmental performance.
- 7.27. The proposals also include the replacement of the roof lights to the exterior. The replacement will be like for like. The existing roof lights are poor in quality and condition and are in a conspicuous area of the building (the corner of the service entrance). Therefore, it is considered that the impact to the Grade II* listed building and the character of the Conservation Area will be negligible.

Lift

- 7.28. The proposals include the installation of a new lift within the west wing serving levels 2-4. This will require the removal of a section of the floorplate at levels 2, 3 and 4 to allow for the creation of a new lift shaft.
- 7.29. The full details of the lift are not yet available and will be confirmed at a later date. However the lift will be fully accessible for all potential users, including those with physical impairments.
- 7.30. This area of the building has very poor existing circulation and is not very accessible for all. As a result, this part of the building is considerably underutilised by users, who find it confusing to navigate.
- 7.31. The installation of the new lift will open up these underutilised spaces to the users and provide a clear means of access to the lower levels of the building. Combined with reconfiguration and refurbishment works, the installation of the lift will contribute to the optimisation of the currently underutilised areas within the west wing at levels 2-4.
- 7.32. The location of the new lift will be in the corner of the west wing where it meets the main building. It is not considered to be visible in this location externally and therefore will not impact the character of the building.
- 7.33. The Heritage Statement considers this element of the proposals to result in less than substantial harm that is outweighed by the benefits of the significant improvement to circulation and accessibility for all users.

Refurbishment and Redecoration

- 7.34. The proposals will not impact areas of high significance within the building.
- 7.35. The existing building is tired and redecoration will reinvigorate the areas. The proposals are seeking to provide high quality teaching and learning spaces, in line with Lasdun's original vision. This will ensure the continued optimal use of the listed building for its original purpose.
- 7.36. Overall, it is considered that the proposals are seeking to preserve and enhance the Heritage asset, in line with the requirements of the Development Plan, and are in keeping with Lasdun's original vision for the building in terms of allowing for future flexibility.

Sustainability

- 7.37. At the heart of the NPPF is the presumption in favour of sustainable development.
- 7.38. London Plan Policy 5.3 'Sustainable Design and Construction' outlines the need for development proposals to demonstrate sustainable design standards are integral to the proposal, including its construction and operation. They should also ensure that these issues are considered at the beginning of the design process.
- 7.39. Camden Core Strategy Policy CS13 'Tackling climate change through promoting higher environmental standards' states that:

"The Council will require all development to take measures to minimise the effects of, and adapt to, climate change and encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation."

- 7.40. Policy CS13 sets out a number of measures by which application proposals should meet this requirement:
- by reducing the effects of and adapting to climate change;
 - promoting local energy generation;
 - increasing water efficiency and minimising surface water flooding; and,
 - introducing carbon reduction measures.
- 7.41. Camden Development Policy DP22 'Promoting Sustainable Design and Construction' sets out how the Council will *"require development to incorporate sustainable design and construction measures"*.

Applicant's Response

- 7.42. This listed building consent application is accompanied by an interim Sustainability Statement.
- 7.43. Although not a requirement for this application, in the spirit of the wider masterplan for the building over the longer term, UCL considered it appropriate to demonstrate how the proposed Phase 1 works will contribute towards providing a more sustainable historic building, and how this has been considered from the outset of the works.
- 7.44. A BREEAM refurbishment and fit out assessment (2014) will be submitted as part of new application at a later date to incorporate Phases 1-3 of the masterplan. The UCL Sustainable Building Standard states that all refurbishment projects with building services or building fabric upgrades must achieve a BREEAM Excellent rating.
- 7.45. A pre-assessment score of 72.7% is targeted ('excellent').
- 7.46. In Phase 1, the installation of new and replacement secondary glazing will significantly contribute to this target.

- 7.47. The building in its existing state with a single glazed façade and uninsulated concrete walls has poor thermal performance and low energy efficiency resulting in the building being too hot in the summer and too cold in the winter.
- 7.48. Within the Phase 1 works, the installation of new and replacement secondary glazing will aim to significantly improve the thermal performance and energy efficiency of the building, and the internal climate for users. This is 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.
- 7.49. Such improvements will also contribute to the improvement of user amenity, including insulation from noise as well as thermal, and light and air quality.
- 7.50. Despite the constraints of the Grade II* listed building, Phase 1 proposals will significantly improve energy performance. As the masterplan progresses and later Phases of work come forward, further work will be carried out to develop detailed strategies for the building in line with BREAM Excellent requirements, the UCL Sustainable Building Standards, Building Regulations and local policy requirements.

8 Conclusions

8.1. This planning statement accompanies a listed building consent application for:

"A new lift serving levels 2-4 within the west wing, and internal alterations and refurbishment works at levels 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".

8.2. The existing building is tired and in need of refurbishment and modernisation in order meet the level of expectation of students and staff at UCL, and ensure UCL's global competitiveness.

8.3. The building has been subject to a number of interventions in the past. Since UCL have taken over the long leasehold of the building, they are seeking to implement a new and much needed overarching masterplan approach to the refurbishment of the building.

8.4. This application relates to Phase 1 of the wider masterplan proposals only. Phase 1 works include easy wins in underutilised parts of the building to provide new teaching, learning and social floorspace, as well as servicing works that will enable future phases to come forward. Phase 1 has been carefully considered to ensure that works can be carried out with minimal impact to the existing users.

8.5. The proposals have been fully considered against relevant planning policy at National, Regional and Local level, and discussed with Camden Planning and Conservation Officers and Historic England who have raised no concerns with regards to the proposed works.

8.6. The benefits of the proposals comprise:

- Improved thermal performance and energy efficiency of the building through the installation of new and replacement secondary glazing and new servicing arrangements.
- Improved user environment for students and staff through reduced noise levels and better internal climate.
- Poor circulation within the lower levels of the west wing to be resolved through the installation of the new lift.
- Increased accessibility of previously poorly accessible areas within the West wing through the provision of a new fully accessible lift.
- Optimised use of underutilised spaces within the west wing at levels 2-4 and at level 4 between Cores B and C.
- Provision of new high quality teaching, learning and social areas that are adaptable to new ways of teaching and learning and flexible for the future.
- Increased investment into this important Heritage asset to ensure its viability for its original purpose into the twenty first century.

8.7. It is considered that the above benefits considerably outweigh the less than substantial harm that a couple of minor elements of the proposals will have against the heritage asset (including installation of new and replacement secondary glazing and the new lift).

8.8. For this reason, we consider that listed building consent should be granted for these proposals.



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