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Planning and Heritage Statement

Temporary Bar at University College London Institute of Education

December 2017

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1 Introduction

- 1.1 This Planning and Heritage Statement ("the Statement") accompanies an application for planning and listed building consent submitted to the London Borough of Camden ("LBC") on behalf of University College London ("UCL"), the applicant. The application seeks temporary consent for a single storey marquee, to be located in the forecourt to the rear of the Institute of Education, 20 Bedford Way, WC1N OAL ("the site").
- 1.2 The description of development is:

"Installation of a single storey temporary (12 months) marquee for use as a temporary Student Union bar within the forecourt area to the rear of the Institute of Education, 20 Bedford Way."

1.3 This Statement sets out the planning justification for the proposed development and provides an assessment against the relevant planning policies and other material considerations.

University College London

- 1.4 UCL is London's leading multidisciplinary university, with over 11,000 staff and nearly 40,000 students. It was ranked seventh in the QS World University Rankings 2016/17 and provides excellence and leadership in teaching and research.
- 1.5 UCL is delivering an ambitious capital programme of renovation and redevelopment of its Bloomsbury Campus. An estate-wide masterplan (http://www.ucl.ac.uk/masterplan) sets out a vision for the long term development and improvement of the core Campus over the next ten to fifteen years. The ten year Capital Programme will see investment of c. £1.3bn in the UCL estate. The "Transforming Bloomsbury" masterplan identifies a range of projects to deliver this vision and the best possible teaching, learning and living environment for its students. A number of the larger projects are nearing completion, whilst further phases are at the feasibility stage.
- 1.6 UCL merged with the Institute of Education ("IoE") on 2 December 2014 creating the single Faculty School, 'UCL Institute of Education'. The merger confirms UCL as the biggest higher education institution in London, and the largest postgraduate institution in the UK.
- 1.7 Since the merger, UCL has identified a significant opportunity to undertake a full phased refurbishment of the Institute of Education to optimise the provision of teaching and study spaces in the building, whilst also improve the existing facilities for students, such as the Student Union ("SU") bar.
- 1.8 In addition to this Statement, the following documents have been submitted as part of or in support of this planning application:
 - Planning Application Form, certificates and notices;
 - · CIL Additional Information Form;
 - Site Location Plan (prepared by Mace);
 - · Existing and Proposed Plans (prepared by Mace);
 - Existing and Proposed Elevations and Sections (prepared by Mace);
 - Design and Access Statement (prepared by Mace);
 - Plant Noise Impact Assessment (prepared by Clarke Saunders);
 - Structural Report (prepared by Taylor Whalley Spyra);
 - Management Plan (prepared by Arcadis); and,
 - SU Bar Option Appraisal (prepared by Arcadis).

1.9 The remainder of this Statement is structured as follows:

- · Section 2 describes the site and the surrounding area;
- Section 3 sets out the rationale for the proposals;
- Section 4 describes the proposals;
- Section 5 details the pre-application consultation undertaken;
- Section 6 sets out the development plan and policy designations for the site;
- Section 7 justifies the proposals against relevant planning policies; and
- Section 8 concludes the Planning Statement.

2 The Site and Surrounding Area

Site location

- 2.1 The site comprises the forecourt area to the rear of the Institute of Education ("IoE"), 20 Bedford Way, WC1N OAL.
- 2.2 The IoE is located on Bedford Way in the London Borough of Camden. The site is bounded to the north by Woburn Square, to the east by the IoE building, to the south by Wing A of the IoE, and to the west by the School of Oriental and African Studies ("SOAS").
- 2.3 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.
- 2.4 The site is located within Sub-area 3 of the Bloomsbury Conservation Area 'University of London / British Museum'. The IoE building is Grade II* listed. To the north of the site are the Grade II listed Woburn Terraces. The SOAS, another Denys Lasdun designed building is Grade II* listed.
- 2.5 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.
- 2.6 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.

Surrounding area

- 2.7 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 Institutions, such as UCL and the University of London.
- 2.8 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

2.9 The listing description states:

"In situ reinforced concrete and precast mullions with a cladding of prefabricated bronzeanodised 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...."

2.10 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.

- 2.11 The main elevation of the IoE fronts Bedford Way. 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.
- 2.12 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.
- 2.13 The built area includes a paved forecourt to the rear of the building. This public space forms the main route into the rear entrance of the building.

Planning History

- 2.14 There is no relevant planning history for works to the external forecourt area.
- 2.15 Of note is LBC application reference 2017/2543/L which was approved on the 30 October 2017 for Phase 1 of the refurbishment works. The approved description of development is:

"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".

- 2.16 This application included four key areas of work:
 - Installation of a new lift serving Levels 2-4 in Wing A to improve accessibility in this part of the building;
 - Installation of secondary glazing where windows are currently single glazed to improve thermal control, noise impacts and energy efficiencies of the building. Existing roof lights are also proposed to be replaced like for like.
 - Internal reconfiguration to allow for more flexibility (in line with Lasdun's original concept) and the provision of new, improved teaching and learning floorspace and social areas.
 - Refurbishment and decoration works throughout to include the installation of new flooring, replacement ceilings, painting and furnishings.
- 2.17 The link between the implementation of the Phase 1 works approved by 2017/2543/L, and this proposal is set out in Chapter 3 of this statement, and in the accompanying 'SU Bar Option Appraisal' prepared by Arcadis.

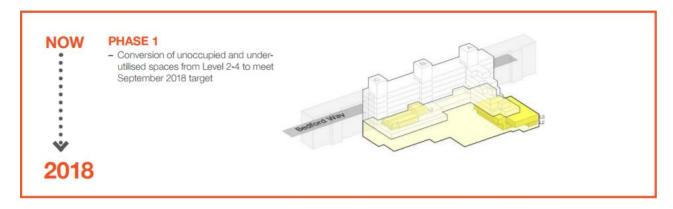
3 Context to the Proposals

Introduction

3.1 This section will introduce the need for the proposals, as well as how these fit in with the redevelopment of 20 Bedford Way. A separate 'SU Bar – Option Appraisal' has been prepared by Arcadis which sets out the justification for the site location of the temporary proposal.

Context to the Proposals

- 3.2 20 Bedford Way is a higher education building designed by architect Denys Lasdun. The post-modern building was completed in 1977 and is now Grade II* listed (listing reference 1246932). The building has been the main hub of the Institute of Education since it was built, and contains the IOE's library and archives, teaching spaces, lecture theatres and conference facilities, student facilities including the SU bar, research facilities and offices for the academic staff and administrative staff. The south end of 20 Bedford Way is occupied by the Centre for Advanced Legal Studies, part of the University of London and the north end is occupied by the University College of London. The total gross area occupied by the Institute is approximately 28,000 sqm.
- 3.3 UCL have a 999-year lease on 20 Bedford Way from the University of London which was agreed in 2008. UCL is currently undertaking a Masterplan for refurbishment of the building to optimise the provision of teaching space and improve student facilities. Phase 1 of the Masterplan received listed building consent ("LBC") (application reference 2017/2543/L) on the 30 October 2017. Phase 1 includes the refurbishment and reconfiguration of unoccupied floorspace in Levels 2-4 of Wing A and between Cores B and C. Phase 1 is currently on site and being implemented. The diagram below highlights the scope of areas included within Phase 1.



- 3.4 The scope of Phase 1 of the Masterplan includes the Institute of Education SU Bar, which is currently located at Wing A Level 3. LBC 2017/2543/L included its relocation to Wing A Level 2.
- 3.5 During summer 2017, consultation with the SU identified a number of concerns towards the proposal to relocate the bar, summarised as follows:
 - Lack of accessibility to external areas directly from the new bar space at Wing A Level 2. The current bar at Wing A Level 3 enjoys direct access to an external terrace.
 - Lack of natural light within the new bar space at Wing A Level 2. The current bar at Wing A Level 3 enjoys access to natural light.
 - A reduction in the size, flexibility and connectivity of the new bar and social space in comparison to the existing bar. The current bar and social space is larger, more flexible and more connected.

- 3.6 This consultation included a series of meetings with the SU and users to gather information on the user preferences, needs and requirements. The result of the consultation feedback was to identify a more suitable location for the SU bar.
- 3.7 Subsequently, UCL has revisited the proposals and will be expanding the scope of works for Phase 1 to also include the refurbishment of Wing A Level 4 to provide the new student bar here, instead of at Wing A Level 2. This will address all of the concerns raised during the consultation. A new listed building consent will be submitted in due course which will formalise the proposals for the new bar at Wing A Level 4.
- 3.8 In the period leading up to securing the new LBC and implementing the proposals for the new bar at Wing A Level 4, the existing bar at Wing A Level 3 will need to be removed to accommodate the progressing Phase 1 works approved under 2017/2543/L. These works are currently on site to ensure that UCL is able to deliver the new teaching space it desperately needs. Given that the new bar will not be delivered at Wing A Level 2 as originally intended and approved by 2017/2543/L, a temporary solution is required to ensure that the student bar facility, a facility of high importance to the student body, continues to be provided during the works.
- 3.9 A statement prepared by Arcadis has been submitted in support of this application. It sets out why a temporary solution must be provided at 20 Bedford Way and justifies the site location. It also sets out how the phasing and implementation of the Masterplan does not allow for an alternative temporary bar to be provided internally at the IoE.

4 The Proposals

- 4.1 This chapter should be read in conjunction with the application drawings and Design and Access Statement.
- 4.2 This planning and listed building consent application seeks consent for:

"Installation of a single storey temporary (12 months) marquee for use as a temporary SU bar within the forecourt area to the rear of the Institute of Education, 20 Bedford Way"

4.3 The single storey structure will comprise of a temporary marquee which is proposed to be installed in the terrace area to the rear of the IoE. An extract of the proposed site plan is included below.

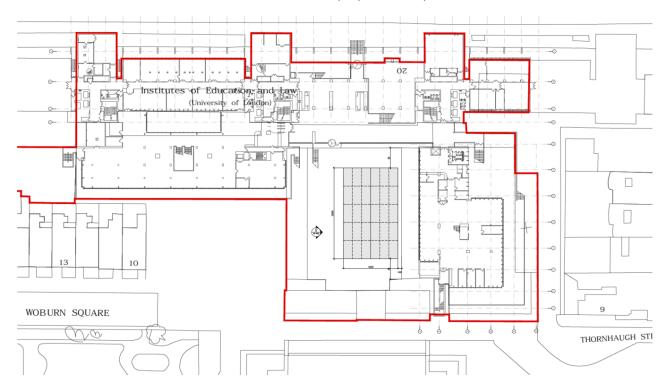


Figure 1: Site Location Plan (Prepared by Mace)

- 4.4 It is proposed that the facility will remain in situ for a temporary period of 12 months. This time scale aligns with the programme of refurbishment works currently being implemented for Phase 1 of the Masterplan.
- 4.5 Internally, the temporary structure will provide a SU bar space for use by students of the IoE. It will also contain all of the relevant facilities within the building envelope, including cellar storage space, toilet facilities (2 male, 2 female and 1 disabled access) and plant equipment (heating and cooling).
- 4.6 Externally, the temporary marquee will have white sides with glazing along the long elevations. The main entrance will be provided on the northwest elevation. See extract of the northwest elevation below.

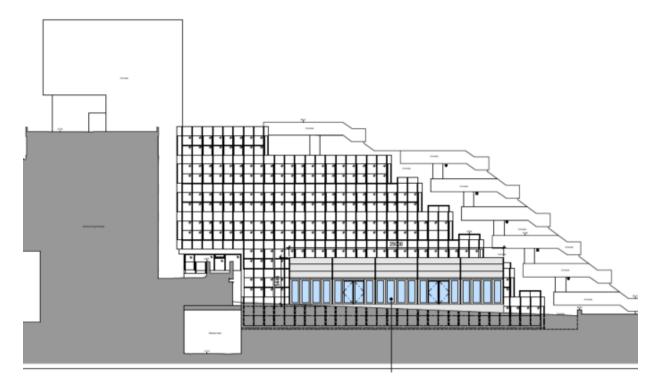


Figure 2: Proposed Northwest elevation (Prepared by Mace)

4.7 The temporary building will be 25m (L) x 15m (W) and provide 375 sqm of new internal floorspace.

5 Pre-application Consultation

5.1 This section summarises the pre-application consultation which has been undertaken with both the users of the SU Bar and other Stakeholders, as well as with the LB Camden.

Consultation with the Users and other Stakeholders

- 5.2 In the summer of 2017 (following submission of application 2017/2543/L), UCL carried out further consultation with the SU and users of the SU Bar.
- 5.3 The consultation included a series of meetings with the SU and users to gather information on the user preferences, needs and requirements.
- 5.4 In summary, the consultation feedback set out three main concerns with the proposed new location of the SU bar at Wing A Level 2, as follows:
 - Lack of accessibility to external areas directly from the new bar space at Wing A Level 2. The current bar at Wing A Level 3 enjoys direct access to an external terrace.
 - Lack of natural light within the new bar space at Wing A Level 2. The current bar at Wing A Level 3 enjoys access to natural light.
 - A reduction in the size, flexibility and connectivity of the new bar and social space in comparison to the existing bar. The current bar and social space is larger, more flexible and more connected.
- 5.5 The result of the consultation feedback was to identify a more suitable location for the SU bar.
- 5.6 Subsequently, UCL has revisited the proposals and will be expanding the scope of works for Phase 1 to also include the refurbishment of Wing A Level 4 to provide the new student bar here, instead of at Wing A Level 2.
- 5.7 To accommodate this proposal, and the implementation of the now approved application 2017/2543/L, the SU bar needs to be relocated on a temporary basis for a period of 12 months. This application seeks planning and listed building consent for a temporary marquee to accommodate the SU for a period of 12 months on the rear terrace of the IoE, 20 Bedford Way.

Consultation with LB Camden

- 5.8 A meeting was held on site with the planning officer on the 16 November 2017.
- 5.9 Table 1 below sets out the application requirements raised by the planning officer at the meeting, and the applicant's response to each of these requirements.
- 5.10 Overall, it is considered that the submission has addressed all the requirements set out by Camden at the pre-application meeting.

Торіс			Camden Comments	Response
Justification Selection	for	Site	Camden advised that a site options appraisal should be undertaken to demonstrate why this site is the only suitable site for the temporary facility, the findings of which should be submitted to support a subsequent application.	The 'SU Bar – Option Appraisal' prepared by Arcadis has been submitted in support of this application. This report sets out why a temporary solution is required, and why the site is the only suitable location.

		Appendix A of the Site Justification Report sets out the capacity study of the IoE and demonstrates that there is no capacity to temporarily locate the temporary bar internally.
Management, Servicing and Delivery Plan	Camden advised that this document should set out details on deliveries and servicing, as well as occupational capacity and security. Camden did not express concerns with regards to proposed opening hours.	A Management Plan has been prepared by Arcadis and submitted in support of this application to address this requirement.
Design and Conservation	Camden advised that due to the short term (12 months) temporary nature of the proposal, the marquee style structure proposed would be acceptable.	The proposal is for a marquee style temporary structure. The proposals are only for 12 months, and will therefore not cause harm to the setting of the listed building permanently. The proposals will only have a temporary visual impact.
Time Period	Camden advised that a phasing plan is prepared to demonstrate the need for the 12 month temporary time period.	A Phasing plan has been included within the 'SU Bar – Option Appraisal' prepared by Arcadis. This sets out the phasing of the proposals and ties the proposed 12 months temporary time period for the SU bar to the phasing and implementation of the first phases of the Masterplan.
Structural Capacity and Loading	Camden set out the requirement for a full structural report to be provided to accompany an application demonstrating that the plinth can take the load with no undue harm caused to the listed building.	A Structural Report has been prepared by Taylor Whalley Spyra and submitted in support of this application to demonstrate that the plinth has sufficient loading capacity so that no undue harm is caused to the listed building.

Table 1: Pre-application Consultation with LB Camden

6 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) sets out the Government's planning policy for England and how these are expected to be applied. The NPPF is a material consideration in the determination of planning applications.
- 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 Development Plan for the application Site comprises of:
 - The London Plan (2016);
 - Development Plan for Camden comprising of Camden Local Plan (2017).
- 6.6 Material considerations for the site will also be of note when determining the application. These include the following:
 - Bloomsbury Conservation Area Appraisal and Management Strategy (2011);
 - Camden Planning Guidance 1: Design (2015), 3: Sustainability (2015);
 - Draft Camden Planning Guidance documents; and,
 - The Draft New London Plan.

Policy Designations

- 6.7 The following policy designations apply to the application site:
 - · Central London Area (Clear Zone Region) CLA;
 - Bloomsbury Conservation Area (Sub-area 3: London University/British Library);
 - · Central Activities Zone (London Plan); and
 - Designated View5A.2 Greenwich Park Wolfe statue to Tower Bridge Right Lateral Assessment Area.

7 Policy Assessment

Introduction

- 7.1 This section sets out the relevant policy in relation to the key issues. The key issues are:
 - Land Use;
 - · Design and Heritage;
 - Management, Servicing and Delivery; and,
 - Amenity

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 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, 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. It 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".

Response

- 7.4 The existing bar is an ancillary use to the D1 use of the building. It is a SU bar that provides a social space for students of the IoE to meet, socialise and relax. The proposal for the temporary bar has been brought forward in response to the need to temporarily relocate the existing SU bar whilst internal refurbishment works are carried out at the IoE (under listed building consent 2017/2543/L).
- 7.5 The implementation of the Phase 1 works will create improved teaching and learning facilities, lecture theatres and social break-out areas in a currently under-utilised area of the building and will re-purpose existing D1 floorspace. 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. The implementation of the Phase 1 works 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.
- 7.6 The proposal for a temporary bar located within the built footprint of the IoE will enable the implementation of these works. It is therefore 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. The proposals will ensure that the SU space, an important facility within the building, is continually provided for the users of the IoE.
- 7.7 The proposed temporary bar's location on the rear forecourt area of the IoE means it will be well placed to serve these existing users. Its location will also allow easy access for those walking, cycling, or using public transport and will limit disruption to the occupiers of the building. Its location is suitable as the proposed SU bar (an ancillary D1 use) is in-keeping with the prevailing higher education uses of immediate and surrounding area.

7.8 The space in which the temporary marquee is proposed to be installed is currently an empty paved space which is underutilised and of relatively low quality. The proposals to install a marquee here for a temporary period of 12 months will therefore not displace any existing facilities for the occupiers and will have limited impact on their amenity, continued use of and access to the IoE.

Heritage and Design

- 7.9 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.
- 7.10 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 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.
- 7.11 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.
- 7.12 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."
- 7.13 London Plan 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, reuses and incorporates heritage assets, where appropriate.
- 7.14 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.
- 7.15 Camden Local Plan Policy D2 'Heritage' seeks to preserve, where appropriate, and enhance Camden's heritage assets and their settings. Policy D2 sets out that Camden will not permit substantial harm to a designated asset and would resist development that would cause harm to significance of a listed building through an effect on its setting.
- 7.16 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".
- 7.17 Camden Local Plan Policy D1 'Design' seeks to secure high quality design in development.

Response

7.18 The IoE is a Grade II* listed building located within the Bloomsbury Conservation Area. There are other listed buildings nearby as set out in Chapter 2 of this report. It is acknowledged that the buildings in the

- surrounding area significantly contribute significantly towards the heritage and character of the Bloomsbury Conservation Area.
- 7.19 The scale of the proposed structure has been carefully considered. A 25m (L) x 15m (W) temporary building is proposed that will accommodate a maximum of 250 users. The size of the temporary structure proposed provides the minimum floorspace required to ensure that the capacity of the SU Bar is maintained when it is relocated from its current home on Level 3.
- 7.20 The marquee has been designed to contain within it all of the services that are required to support the temporary bar use, both for the students (toilets, microwaves etc.) and the bar operation (heating and cooling equipment and storage area). This consolidated approach minimises visual clutter.
- 7.21 The marquee style structure is designed as a temporary structure and as such its design reflects its temporary nature and time limited purpose. For its purpose and type of temporary structure, the marquee is of high quality.
- 7.22 The proposals do not include any modifications to or loss of any historic fabric from the IoE, or any of the other surrounding listed buildings. Of further note, any harmful impacts caused by the proposals will only be for a limited period of 12 months, following which the temporary marquee will be removed in its entirety with no residual impact to the listed building. Therefore the proposals do not represent a permanent, long-term impact on the setting of the listed building or the character of the Conservation Area.
- 7.23 A structural survey has been prepared by Taylor Whalley Spyra and submitted in support of this application. It demonstrates that the structural loading capacities of the rear forecourt area of the IoE is able to accommodate the temporary building without causing undue damage to the structure of the listed building.
- 7.24 Overall, there will be no long term impact or harm to the designated heritage assets.

Management, Servicing and Delivery

- 7.25 London Plan Policy 5.17 'Waste Capacity' states that suitable waste and recycling storage facilities are required in all new developments.
- 7.26 Local Plan Policy A1 'Managing the Impact of Development' states that the Council will consider a number of factors, including delivery and servicing management plans, in order to protect the quality of life of occupiers and neighbours.

Response

- 7.27 A Management, Servicing and Delivery Plan has been prepared by Arcadis and submitted in support of this application.
- 7.28 There are no dwellings within the vicinity of the site and therefore occupants of neighbouring buildings are mostly employees or students (B1 and D1 uses). These uses are less sensitive, however their amenity has nonetheless been given due consideration.
- 7.29 The Management Plan sets out details of the construction logistics which will be limited to a tight three week timescale with appropriate safety measures implemented. This will limit the impact on surrounding occupiers. The applicant expects that a condition limiting construction work to appropriate daytime hours will be applied to a subsequent planning consent.
- 7.30 With regards to deliveries once the bar is operational, it sets out that this will not differ from the current arrangement for the existing internal bar of two deliveries per day before 11am on weekdays only. An existing servicing road will be used by delivery vehicles as per the existing bar arrangements. Deliveries will then be wheeled by hand to the temporary bar store via an existing pedestrian route. All deliveries will be pre-booked with the management team and have regular delivery slots. Overall, it is considered that this delivery schedule will have minimal impact on the amenity of the surrounding occupants, especially as it differs minimally from the existing arrangements.

- 7.31 The Management Plan sets out that sufficient waste and recycling bins will be provided internally. Waste collection will not differ from the current arrangements with bins collected on a daily basis.
- 7.32 Overall, the servicing, delivery and management arrangements for the proposed temporary bar will have limited impact on surrounding occupiers and they will not differ greatly from existing arrangements.

Access

- 7.33 London Plan Policy 7.2 'An Inclusive Environment' requires all new development in London to achieve the highest standards of accessible and inclusive design. Development should have no disabling barriers, and should be used safely, easily and with dignity by all.
- 7.34 Camden Local Plan Policy C6 'Access for All' seeks to promote fair access and expects new development to meet the highest practicable standards of accessible and inclusive design.

Response

- 7.35 Two access ramps will be provided at the entrance of the marquee. These ramps are DDA compliant. The temporary building is therefore accessible and inclusive in terms of design in line with the London Plan and Local Plan requirements.
- 7.36 There will also be a disabled toilet provided within the marquee.

Amenity

- 7.37 London Plan Policy 7.15 'Reducing and Managing Noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes' states that development proposals should seek to mitigate and minimise potential adverse impacts of noise.
- 7.38 Camden Local Plan Policy A4 'Noise and Vibration' states that development should have regard to Camden's Noise and Vibration Thresholds and development will not be granted planning permission should it or proposed plant or machinery be likely to generate unacceptable noise and vibration impacts.

Response

- 7.39 An acoustic report prepared by Clarke Saunders has been submitted in support of this planning and listed building consent application. It assesses the noise from the proposed fixed plant and patron noise at three receptor locations. It demonstrates compliance with plant noise emissions criteria at the nearest residential receptor. In addition, the assessment of patron noise impact, on the basis of reasonable assumptions, shows noise levels being consistent with or lower than prevailing ambient noise levels.
- 7.40 The Management Plan provides details of how the maximum occupancy will be managed. This is in line with the arrangements for the existing bar. The temporary structure will be secured outside of operating hours to minimise anti-social behaviour and use of the temporary structure outside of the approved hours. During operating hours, security personnel will ensure that users do not gather outside of the facility. The management strategies employed will minimise the impact of the temporary bar on the amenity of the neighbouring occupiers in terms of noise and the potential for anti-social behaviour.

Sustainability

7.41 The NPPF states that:

"at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking."

7.42 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.

7.43 Local Plan Policy CC1 'Climate Change Mitigation' required all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.

Response

- 7.44 Measures have been taken to ensure the sustainability of the development. The marquee is a reusable temporary structure. The temporary nature of the development is therefore arguably more environmentally friendly than a fixed long term structure.
- 7.45 The temporary building will only be in situ for a period of 12 months and will have no lasting impact to the surroundings.

8 Heritage Impact Assessment

- 8.1 This chapter assesses the heritage impact of the proposals.
- 8.2 The site context is outlined in Chapter 3, and within the accompanying DAS. In summary, there are three designated heritage assets to consider:
 - The Bloomsbury Conservation Area;
 - The Grade II* Institute of Education (list reference 1246932); and,
 - The Grade II* Philips Building, School of Oriental and African Studies (list reference 1401342).
- 8.3 There are other listed buildings within 100m of the site, however it is considered that only SOAS and the IoE have a visual relationship with the site. The Georgian terraces to the north at Woburn Square, and to the south at Russell Square have a close relationship with the Squares that they face onto and are inwards facing. The site is located between the two Denys Lasdun designed buildings and does not contribute to the townscape of these Squares. Therefore the site is considered to only contribute to the setting of these two listed buildings.

Policy and Guidance

The Planning (Listed building and Conservation Areas) Act 1990

- 8.4 As the Site is situated within a Conservation Area, Section 72 of the Act (which requires the Local Planning Authority to pay special attention to the 'desirability of preserving or enhancing the character or appearance of that area') is directly relevant to the Proposed Development.
- 8.5 There are also 2 listed buildings which may be affected by the proposed development. Section 66 of the Act requires the Local Planning Authority to 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possess' when considering whether to grant Planning Permission.

Relevant Planning Policy

8.6 Please refer to Chapter 7 for the relevant policy relating to Heritage.

National Guidance

- 8.7 Historic England's Conservation Principles (2008) laid the bedrock for the principles set out in the NPPF regarding the historic environment, and provides guidance on the policies in the NPPF, particularly on understanding significance. Detail is also provided on the four values highlighted in the NPPF's definition of significance: Evidential, historical, aesthetic and communal.
- 8.8 There are a number of guidance documents prepared by Historic England that have also been considered.

Assessment of Significance

Bloomsbury Conservation Area

- 8.9 The Bloomsbury Conservation Area was designated in 1968 and has been extended several times.
- 8.10 The Conservation Area is noted for its formally planned arrangements of streets and squares. The Bloomsbury Conservation Area Appraisal sets out that the site lies within sub-area 3 the 'University of London / British Museum' character area. The building is described as part of a group with its neighbour, SOAS.
- 8.11 The Bloomsbury Conservation area is vast and given the scale of the proposals, the significance of just sub-area 3 has been considered. The area has high architectural significance given the dominating presence of the IoE and SOAS. It also has high historical significance given that the site is located on part of the built

area of IoE, which represents just part of the architect's original intended Masterplan for the area which involved the demolition of further Georgian terraces on Woburn Square.

Contribution of Site to Character of Conservation Area

8.12 The site comprises the paved forecourt area to the rear of the IoE. It forms part of the built area of the IoE and therefore is very closely associated with its built form. It is a quasi-public space which is accessible but also slightly closed off by way of its raised and mostly fenced nature. It is therefore considered to have a limited contribution to the character of the Conservation Area.

Institute of Education

- 8.13 The IoE building has a strong design concept of stepped form, bold horizontal layers and strong vertical elements this gives the building a high quality architectural finish and lends it high significance.
- 8.14 The historic significance of the building is consider to be high. The building is an example of large scale brutalist architecture of the post-war era. It was also designed by a highly acclaimed architect post-war architect, Sir Denys Lasdun.
- 8.15 Overall, the heritage significance is considered to be high.

Contribution of Setting to Significance

8.16 The setting of the listed building is considered to contribute to its significance. The setting of the listed building is comprised of its close relationship with SOAS – of similar architectural intent and materials. The buildings are separated by a permeable pedestrian only route which increases this sense of a relationship. This gives the sense of an educational enclave, which is further emphasised by the very different built form to the north and south at Woburn Terrace and Russell Square, where the prevailing Georgian townscape takes precedent.

Contribution of Site to Setting

8.17 The site comprises the paved forecourt area to the rear of the IoE. It is a fairly plain space with low quality materials. Its key purpose is to provide a pedestrian route into the building from the rear at Level 4. Given that the site forms part of the built form of the IoE, the site contributes significantly to the setting of the listed building.

SOAS

- 8.18 SOAS shares a strong architectural form with IoE, but does not have such a monumental presence in the area. It is considered to have high architectural interest. The listing description states: "while relatively little-known, this pavilion library is one of the most powerful library designs of the post-war period, also of interest for being a work of this major post-war architect".
- 8.19 Like IoE, the asset is considered to have high historical, evidential and architectural significance.
- 8.20 The proposals will not require excavations and therefore archaeological significance has not been considered.

Contribution of Setting to Significance

8.21 The setting of the listed building is considered to contribute to its significance. The setting of the listed building is comprised of its close relationship with IoE – of similar architectural intent and materials. The buildings are separated by a permeable pedestrian only route which increases this sense of a relationship. This gives the sense of an educational enclave, which is further emphasised by the very different built form to the north and south at Woburn Terrace and Russell Square, where the prevailing Georgian townscape takes precedent.

Contribution of Site to Setting

8.22 The site comprises the paved forecourt area to the rear of the IoE. It is a fairly plain space with low quality materials. Its key purpose is to provide a pedestrian route into the IoE from the rear at Level 4. Given that the site forms part of the built form of the IoE, the site contributes significantly to the setting of the IoE,

but less so to the significance of SOAS. It is visually connected, but physically cut off by its raised level and its close relationship with IoE.

The Proposals

8.23 The proposals are set out in Chapter 4 of this statement, and within the DAS and drawings.

Assessment of Impact

- 8.24 The temporary marquee will have limited impact on the setting of the listed buildings given its short-term (12 month) temporary nature.
- 8.25 The proposals will require no excavation works and the marquee will be situated on the existing paving of the IoE rear forecourt. As such no physical interventions are required that will impact the fabric of the listed building. Therefore the proposals will have no long term impact on the architectural, evidential or historical significance of the IoE or SOAS.
- 8.26 The proposed temporary bar will have a limited impact on the character of the Conservation Area. However, the design of the marquee reflects its temporary nature and as such the visual impact will be associated with a temporary solution.
- 8.27 Furthermore, the limited impact and temporary harm that is caused, is considered to be outweighed by the following public benefits:
 - Provision of the temporary facility for users of the IoE to ensure their experience of studying at IoE
 continues to be high quality with all the facilities that are required and expected;
 - Continued provision of a student facility which has an important role to play in the identity of the IoE – for which the building was originally designed;
 - By allowing the implementation of the first phase of the Masterplan at IoE:
 - The Grade II* listed building will receive the attention and refurbishment works that it needs to ensure the building remains relevant and is able to continue to perform its original purpose; and,
 - UCL will be able to deliver significantly improved and high quality D1 floorspace in Camden, contributing to the important role of the higher education sector in Camden, and to the role and function of the wider London CAZ.
- 8.28 Overall, the proposals are considered to cause minor short term harm to the setting of the listed buildings and the character of the Conservation Area. However this harm is limited and completely reversible due to the nature of the proposals.

9 Conclusion

9.1 UCL is seeking planning and listed building consent for:

"Installation of a single storey temporary (12 months) marquee for use as a temporary SU bar within the forecourt area to the rear of the Institute of Education, 20 Bedford Way."

- 9.2 The application has been informed by pre-application consultation with both the user group and LB Camden. The result of the consultation with the user group was that a more suitable permanent home for the new Student Bar needed to be sought than the approved location at Level 2 Wing A (granted under LBC 2017/2543/L).
- 9.3 The new permanent home for the Student Bar is now proposed to be at Level 4 Wing A. A separate listed building consent application will be submitted to formalise this proposal at a later date.
- 9.4 In the interim period between relocation to Level 4 and the implementation of the Phase 1 refurbishment works, a temporary bar solution is required. A temporary marquee is proposed to the rear forecourt of the IoE to accommodate the SU Bar for a temporary period of 12 months. This time period is closely aligned to the programme of works for Phase 1.
- 9.5 The proposed location has been fully justified in the accompanying 'SU Bar Option Appraisal' prepared by Arcadis. This appraisal considers and discounts alternative sites and temporary solutions and why these were discounted.
- 9.6 This Statement should be read in conjunction with the documents listed in paragraph 1.8 of this Statement.
- 9.7 This Statement has justified the proposals against relevant planning policy and undertaken a heritage impact assessment.
- 9.8 It concludes that the temporary nature of the design means that it will have a very limited impact on the setting of the listed buildings and the character of the Bloomsbury Conservation Area. The design of the marquee is minimised to only allow for maximum occupancy and will also include DDA compliant ramps to ensure that it will be accessible to all.
- 9.9 The proposed structure will accommodate the existing SU bar and therefore the occupation and use levels will be very similar to the existing SU bar within the building. As such, servicing and delivery requirements will remain similar to the existing. Therefore there is not expected to be any negative impact on neighbouring occupiers (D1 and B1 uses) as a result of servicing and deliveries.
- 9.10 A robust management plan will be in place to ensure that the proposed temporary SU bar will be appropriately managed with appropriate security measures in place. Given the limited opening hours, and as set out in the supporting acoustic report, the proposed bar is not likely to give rise to harmful effects on amenity.
- 9.11 Overall, given the above and the limited impacts that the proposals will have both to neighbouring occupiers and in terms of heritage assets, it is considered that this application for planning and listed building consent be granted with appropriate conditions in place.

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