



Deloitte LLP
Athene Place
66 Shoe Lane
London
EC4A 3BQ

Phone: [REDACTED]
Fax: + [REDACTED]
www.deloitte.co.uk

Direct phone: [REDACTED]

8 March 2018

London Borough of Camden
5 Pancras Square
London
N1C 4AG

FAO Antonia Powell

Dear Antonia,

University College London, 26 Bedford Way, London, WC1H 0AP

Full Planning and Listed Building Consent Application for Installation of a MRI Scanner

On behalf of our client, University College London ('UCL') (the 'Applicant'), we hereby submit to the London Borough of Camden ('LBC') an application for planning and listed building consent for the installation of an MRI Scanner and associated works in the basement of 26 Bedford Way (the 'Site'). The description of the development is as follows:

"Full planning and listed building consent for the installation of a new MRI Scanner and associated works at 26 Bedford Way, WC1H 0AP"

The proposals are for the installation of a new MRI Scanner within the basement of 26 Bedford Way for use by the Birkbeck-UCL Centre of Neuroimaging ("BUCNI"). The proposed works will include the temporary removal of two concrete mullions and three glazing panels, localised lowering of the floor, reconfiguration and refurbishment works to create a new MRI Scanner facility and associated control room in the basement of 26 Bedford Way.

Background to UCL

UCL is London's leading multidisciplinary university, with over 11,000 staff and nearly 40,000 students. UCL provides excellence and leadership in teaching and research, was ranked seventh in the QS World University Rankings 2018, and is among the top 20 universities ranked by The Times (16) and The Guardian (10).

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. UCL's strive to provide such world-class facilities is evident in Central London on their Bloomsbury Campus.

The provision of world class teaching and research space and student accommodation are regarded as essential components of UCL's ability to attract high quality students and staff, both from the UK and abroad.

Deloitte LLP is a limited liability partnership registered in England and Wales with registered number OC303675 and its registered office at 2 New Street Square, London, EC4A 3BZ, United Kingdom.

Deloitte LLP is the United Kingdom affiliate of Deloitte NWE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NWE LLP do not provide services to clients. Please see www.deloitte.com/about to learn more about our global network of member firms.

© 2018 Deloitte LLP. All rights reserved.

Rationale for the Proposals

The application seeks permission for a new MRI Scanner for use by BUCNI. BUCNI provides state of the art magnetic imaging facilities for Birkbeck and UCL staff. BUCNI forms part of the Experimental psychology department which explores behaviour in both human and other species, from a cellular level through brain systems, cognition, computational and social levels. BUCNI's core research encompasses behavioural and cognitive neuroscience, sensory systems, learning and memory, language, decision-making and social cognition. The research is carried out by using state-of-the-art facilities within the department, including brain imaging (MRI Scans) and stimulation, behavioural testing and systems neuroscience.

The provision of MRI facilities for BUCNI at 26 Bedford Way is just one example of the wide range of top research facilities that are provided on the Bloomsbury Campus. This application seeks to enhance this particular element of research facility provision, with the addition of a new top of the range MRI Scanner at 26 Bedford Way. The provision of a new state of the art MRI Scanner will be vital to enable the continued ground breaking research carried out by UCL and its staff.

Pre-application Consultation

A pre-application meeting was held on site with the planning and conservation and design officers on 15 September 2017. At this meeting the principle of the proposals was discussed, and discussions focused on the temporary removal of the concrete mullions and the glazing panel. It was acknowledged that the proposals would have a temporary harmful impact but that the mullions and glazing panels would be reinstalled as they were before. No concerns were raised with regards to the localized proposed internal reconfiguration and refurbishment works.

It was noted that the service road was cluttered and that a consolidated approach to any external plant and machinery required should be taken.

The Proposals

The proposals comprise of the following works which are broken down to external and internal works:

External Works

- Temporary removal of two concrete mullions and three glazing panels to allow for the installation of the MRI Scanner from its delivery on the service road. The mullions and glazing will be fully reinstated.
- Installation of new plant equipment serving the MRI Scanner and plant enclosure on the service road adjacent to the MRI scanner operational area.

Internal Works

- Localized lowering of the floor level to allow for adequate ceiling height for the MRI to be situated and operate at the basement level of the building.
- Localized removal of existing internal modern partitions and doors.
- Installation of new partitions and doors where required to reconfigure the space and create a control room, entrance area and operational room (in which the MRI Scanner will be located).
- Redecoration works.

For further detail, please refer to the architectural drawings and Design and Access Statement prepared by CSM Architects which have been submitted in support of this application.

Planning History

The site has a comprehensive planning history including listed building consents for refurbishment works and planning and listed building consents for installation of new plant. Recent consents and those of relevance,

including the planning and listed building consent for the existing MRI Scanner at 26 Bedford Way, are set out in the table below.

Application Reference Number	Description of Development	Decision and Date
2016/1261/L	Partial refurbishment and reconfiguration of existing office, teaching and laboratory space on 3rd floor.	Granted on 21 June 2016.
2011/5355/L	Partial refurbishment and reconfiguration of existing office, teaching and laboratory space at fourth floor level of university building (Class D1).	Granted on 2 March 2012
2009/2801/L and 2009/2787/P	Works associated with the replacement of existing metal railings at front elevation with wire mesh railings and erection of gate at access to sunken garden.	Refused on 14 October 2009
2008/4977/P and 2008/4843/L	Works associated with the installation of a replacement roof mounted chiller plant.	Granted on 12 March 2009
2007/2742/L	Works to include the conversion of the existing ground floor seminar room to three seminar spaces as existing including the removal of existing security grilles and blinds and installation of new blackout curtains.	Granted on 14 August 2007
2006/2052/L and 2006/2049/P	Internal and external alterations/works including the Installation of MRI scanner in basement, the removal of a structural column and temporary removal of fenestration to enable access, positioning of associated chiller unit inside existing enclosure on the roof and installation of quench pipe through window at basement level and other associated service pipes and cables.	Granted on 18 July 2006
2006/4136/L	Details of method statement for removal and reinstatement of windows and frames pursuant to condition 3 of listed building consent dated 18.06.06 (ref. 2006/2052/L) for internal and external alterations/works including the installation of MRI scanner in basement.	Granted on 18 October 2006

The 2006 planning and listed building consent (reference 2006/2049/P and 2006/2052/L) sets a precedent for the current proposals. The method of installing the new MRI scanner is the same as that proposed in the 2006 application, which also required the temporary removal of a concrete mullion and its re-installation.

The Development Plan

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.

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

- The London Plan (2016);
- Camden Local Plan (2017);
- Camden Policies Map (2017).



The following are material considerations in the determination of applications:

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

The Draft New London Plan (2017) and draft NPPF (2018) are also material considerations

Policy Designations

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.

The site is Grade II* listed and was designed by Sir Denys Lasdun. It is located to the rear of the Grade II listed Woburn Terraces.

Planning Policy Considerations

This section of the letter assesses the proposal against relevant planning policy set out in the development plan. There are three key policy areas that are addressed below:

- Land use;
- Design; and,
- Heritage.

Land Use

Policy 2.10 'Central Activities Zone – Strategic Priorities' and 2.11 'Central Activities Zone – Strategic Functions' of the adopted London Plan seek to enhance and promote the unique international, national and London-wide roles of the CAZ and ensure development complements and supports the clusters of other strategically important, specialized CAZ uses including health and academic uses.

Policy SD4 'The Central Activities Zone' Part G of the DNLPP recognizes that the CAZ is a center of excellence for health and educational activities and identifies the site as being within a specialist academic cluster.

Camden Local Plan Policy C2 'Community Facilities' states that the Council will support the investment plans of educational, health, scientific and research bodies to expand and enhance their operations.

Applicant's Response

The proposals will allow for the provision of a new MRI Scanner at 26 Bedford Way. The new MRI Scanner will add to, diversify and complement the existing research facilities and MRI Scanner at BUCNI. The new state of the art MRI Scanner will allow the researchers in the BUCNI to further their knowledge and understanding in this research field and thereby contribute to UCL's high quality research output. UCL plays an important role in the Borough, in wider London, nationally and internationally and provides research with global reach in implications. The proposal will ensure that UCL continues to be able to play this role, and continues to act as a centre of excellence for research, academia and educational facilities.

For these reasons, it is considered that the proposal is in line with the aforementioned policies of the London Plan, draft New London Plan and the Camden Local Plan.

Design

Chapter 7 of the NPPF sets out the requirements for good design, which is considered to be a key aspect of sustainable development, whilst London Plan Policy 7.6 'Architecture' sets out that new development should be of the highest design quality.

Policy D1 'London's Form and Characteristics' of the DNLP states that proposals should respond appropriately to local context. Policy D3 'Inclusive Design' sets out that proposals should meet the needs of all Londoners and achieve the highest standards of accessible and inclusive design.

Camden Local Plan Policy D1 'Design' states that the Council will seek to secure high quality design in development that respects local character and context, preserves or enhances the historic environment and heritage assets and is inclusive and accessible for all.

Applicant's Response

The proposals will provide a high quality neuroimaging facility at 26 Bedford Way to complement and extend the capabilities of the existing provision. This facility necessitates some minor reconfiguration of the internal circulation and room layout. The layout is considered to be of optimal design to deliver an appropriate working research environment. The finish of internal spaces will be of high quality.

The proposals will not permanently alter the façade of the building, with the concrete mullions and glazing panels to be temporarily removed, and following the MRI Scanner installation, refitted as was. The proposed plant enclosure will be constructed of high quality materials that will reflect the colour and materiality of the glazing panels of the building. It will not be attached to the façade of the building as shown on the proposed section (ref.4443/14B).

It must also be noted that the proposed plant enclosure will be located at basement level on the service road to the rear of the building. It will therefore not be visible from publicly accessible locations, such as Woburn Terrace. The Georgian terraces that overlook the rear of the building are in Class D1 use and therefore there are no sensitive uses overlooking the service yard. Additionally, this area was purposefully designed by the architect, Denys Lasdun, as a service road for the building, and as such the location of plant and equipment which is necessary to service the academic and research uses in the building in this location is considered appropriate.

The proposed location in the building, the fact that the plant enclosure will be stepped back from the façade, and that the façade will be reinstated after installation of the MRI Scanner, demonstrates that considerable thought has been given to the design of the proposal to ensure that no permanent harm is caused to the Heritage asset. Overall therefore it is considered that the proposals are of a high quality design in line with local and national policy requirements.

Heritage

The NPPF Paragraph 131 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.

Paragraph 132 of the NPPF 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.

Paragraph 133 notes that where it is substantial harm local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefit. 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.

The 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, re-uses and incorporates heritage assets, where appropriate.

Policy HC1 'Heritage Conservation and Growth' of the DNLP states that "development proposals affecting heritage assets, and their settings, should conserve their significance" and should seek to avoid causing harm.

Camden Local Plan Policy D2 'Heritage' sets out that the Council will preserve and, where appropriate, enhance Camden's heritage assets and their settings. The Council will not permit the loss of or substantial harm to a designated heritage asset, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

Applicant's Response

A Heritage Assessment has been prepared by Alan Baxter Associates and submitted in support of this application. The assessment of impact concludes that overall the scheme has no significant impact to fabric of any significance.

The proposals have been developed with the historic building at the forefront of the design solution. It is recognized that there will be some temporary harm to the significant fabric of the building. The temporary removal of the two concrete mullions and three glazing panels will allow for the installation of the MRI Scanner, and these will be reinstalled as they were beforehand.

The proposals will include the localised lowering of the floor slab, however, this is at basement level and therefore is not considered to have a significant impact to, or cause harm to the significant fabric of the listed building.

The proposals include the removal of some existing partitions, however these are not considered to be original and do not have a significant or original layout. The installation of new partitions to reconfigure the space will allow for the MRI scanner to be used by the research team effectively.

The proposals include new plant and associated plant enclosure on the service road at basement level to the rear of the building and next door to the scanner area. One opening will be required to allow for servicing to enter and leave the building, but the plant enclosure itself will not be adjoined to the façade. It will be constructed of high quality materials that are sympathetic to the materiality of the listed building. It will also not be visible from publicly accessible locations within the Bloomsbury Conservation Area. Due to its secluded location it is not considered that the plant enclosure will have any impact on the character or setting of the Bloomsbury Conservation Area.



The proposed plant enclosure will be located on the service road, which was purposefully designed by the architect, Denys Lasdun, as a service road and service area for the building. As such the location of plant and equipment which is necessary to service the academic and research uses in the building in this location is considered appropriate.

As the service road is below ground level, the plant enclosure is not considered to impact the setting of the neighbouring Grade II listed Woburn terraces.

Conclusion

For the above reasons, it is considered that the proposal complies with the Development Plan and will not have a harmful impact on the aforementioned designated heritage assets.

Planning Application Documents

The application comprises:

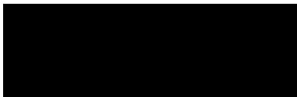
- Planning application form and certificates;
- Site Location Plan prepared by Deloitte;
- Architectural drawings including site plan; existing, demolition and proposed floorplans, elevations and sections prepared by CSM architects (please refer to the drawing register for further details);
- Design and Access Statement by CSM architects;
- Heritage Statement prepared by Alan Baxters Associates;
- Acoustic Report prepared by Eurovib Acoustic Products Ltd;
- Vibration Report prepared by Siemens;
- Schedule of Works prepared by DP Porter Construction;
- Structural Drawings and Structural Report prepared by wsp; and,
- Technical Specifications.

Summary

The application has been submitted via planning portal. The application fee of £234 has been paid under separate cover.

We trust that you have all the information you need to validate the application. Should you have any queries or require any further information, then please do not hesitate to contact my colleague Ellie Bird (020 7007 3891 / ebird@deloitte.co.uk).

Yours sincerely,



John Adams
Deloitte LLP