



Institute of Education, 20 Bedford Way
Planning Statement – Phase 1B

June 2018

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

“Refurbishment of Levels 2, 4 and 5 in Wing A at the Institute of Education, 20 Bedford Way including: reconfiguration of internal layouts to allow for the installation of a new student bar, provision of new teaching and study spaces, staff office spaces and associated facilities; refurbishment works including the installation of secondary glazing and a new servicing strategy; addition of new louvres to external façade; installation of new doors to access external terraces at Levels 4 and 5; replacement of the roof light serving stairs to the lower floors at Level 4; and, installation of insulation resulting in the raising of the finished terrace level (including enclosing railings) at Level 4 and 5 by 150mm”.

- 1.2. The proposals comprise Phase 1B of a masterplan 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 out-dated and in need of refurbishment. 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. Phase 1A of the Masterplan was granted listed building consent on 30 October 2017 (reference 2017/2543/L). Phase 1A comprised the installation of a new lift serving Levels 2-4 in Wing A, the general refurbishment at Levels 2-4 of Wing A, and Level 3 between cores B and C. The listed building consent set the precedent for a number of refurbishment details that will be common across the Masterplan phases, such as details of the secondary glazing and new doors.
- 1.5. The Phase 1A listed building consent application included the relocation of the current Student Union Bar at Level 3 to Level 2. However, user consultation has led to a decision for the student bar to be located at Level 4. Therefore this new planning and listed building consent application allows for the relocation of the student bar to Level 4, and the creation of new teaching space at Level 3.
- 1.6. This planning and listed building application is seeking consent for internal and external alterations. The proposals aim to address key issues that the building currently suffers from and thereby improve its effectiveness and efficiency and the overall quality of the student experience. The proposals, as forming part of a wider masterplan, will also allow for the provision of much needed new teaching and learning spaces for UCL through the rationalisation of the building.

Application Documents

- 1.7. 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;
- Structural Drawings; and,
- Acoustic Survey.

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 planning 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 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 Planning History

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 planning and listed building consent application relates to 20 Bedford Way only, and specifically levels 2, 4 and 5 of the west wing.

Planning History

- 2.13. The site has an extensive planning history.
- 2.14. In December 2016, an 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) was approved. The amendments sought included the changing of the profile of the proposed extension from sloped to stepped. The applications were approved in December 2016.
- 2.15. Other relatively 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 was 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”*.
- 2.17. Most recently, Phase 1A of the Masterplan received listed building consent on 30 October 2017 (reference 2017/2543/L). Phase 1A comprised the installation of a new lift serving Levels 2-4 in Wing A, and general refurbishment at Levels 2-4 of Wing A, and Level 3 between cores B and C. The listed building consent set the precedent for a number of refurbishment details that will be common across the Masterplan phases, such as details of the secondary glazing and new doors.
- 2.18. Applications to discharge conditions relating to details of the secondary glazing, the new lift, and new doors have all been submitted and discharged in early 2018 (references 2017/6850/L and 2018/1069/L).
- 2.19. A planning and listed building consent application for a temporary bar (reference 2018/0257/L and 2017/7061/P) was approved in January 2018. This application was for a marquee to be located for a temporary period of 1 year within the external forecourt area of the IoE. It would provide the Student Union Bar with a temporary home whilst the refurbishment works were carried out to allow for its relocation within Wing A.
- 2.20. This planning and listed building consent relates to Phase 1B of the Masterplan. It relates to Levels, 2, 4 and 5 of Wing A only. It includes the relocation of the Student Union Bar to Level 4 of Wing A.

3 Background to the Application

Project Background

- 3.9. 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.
- 3.10. 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.
- 3.11. 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.
- 3.12. 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.
- 3.13. 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.
- 3.14. 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.
- 3.15. 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.
- 3.16. 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

- 3.17. 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.
- 3.18. 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.
- 3.19. This planning and listed building consent application relates to Phase 1B of the refurbishment and improvement works only.
- 3.20. 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.
- 3.21. 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.
- 3.22. 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.
- 3.23. Phase 1B seeks to unlock underutilised and inefficient floorspace at floors 2, 4 and 5 whilst updating existing mechanical services.
- 3.24. 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

- 3.25. Prior to the submission of this application for Phase 1B, a package of enabling works was discussed with London Borough of Camden in May 2018. These enabling works comprised the strip-out of the areas of the building to which Phase 1B relates. They included the removal of non-original partitions and internal fabric as well as asbestos.
- 3.26. A package of demolition drawings have been prepared by Mace and submitted to Camden via email.

- 3.27. 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.
- 3.28. The next Chapter sets out the proposals comprising Phase 1B of the refurbishment works, for which this application seeks planning and listed building consent.

4 The Proposals

Description of Development

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

"Refurbishment of Levels 2, 4 and 5 in Wing A at the Institute of Education, 20 Bedford Way including: reconfiguration of internal layouts to allow for the installation of a new student bar, provision of new teaching and study spaces, staff office spaces and associated facilities; refurbishment works including the installation of secondary glazing and a new servicing strategy; addition of new louvres to external façade; installation of new doors to access external terraces at Levels 4 and 5; replacement of the roof light serving stairs to the lower floors at Level 4; and, installation of insulation resulting in the raising of the finished terrace level (including enclosing railings) at Level 4 and 5 by 150mm".

- 4.2. This application includes full details of the secondary glazing and new doors which were approved via condition for Phase 1A, setting the precedent for these details for the remainder of the Masterplan.

Description of Proposals

Reconfiguration

- 4.1. 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.
- 4.2. The proposals are seeking to remove existing internal partitions and re-arrange the internal spaces to create new teaching floorspace, offices, social areas and a Student Union Bar.

Level 2

- 4.1. The approved and proposed layouts at Level 2 are included at Figure 1 below. The proposed layout demonstrates that at Level 2 new teaching spaces will be provided in place of the previously approved Level 2 Student Union Bar.

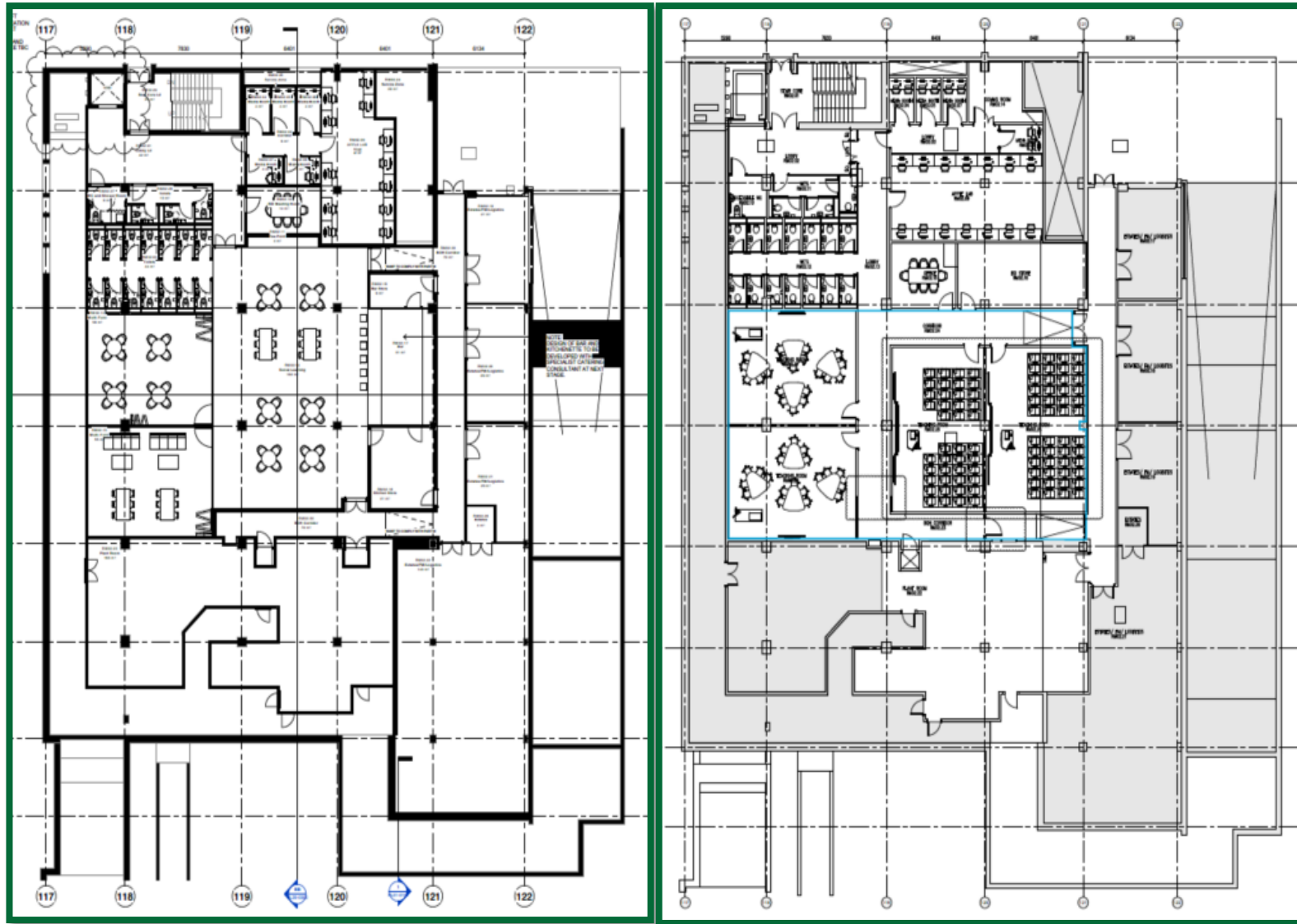


Figure 1: Approved and Proposed Layout at Level 2

Level 4

- 4.2. UCL currently has listed building consent for the following layout at Level 4 (Figure 2). However, with the relocation of the Student Union Bar to Level 4 forming part of this application, the layout will be reconfigured (Figure 2).

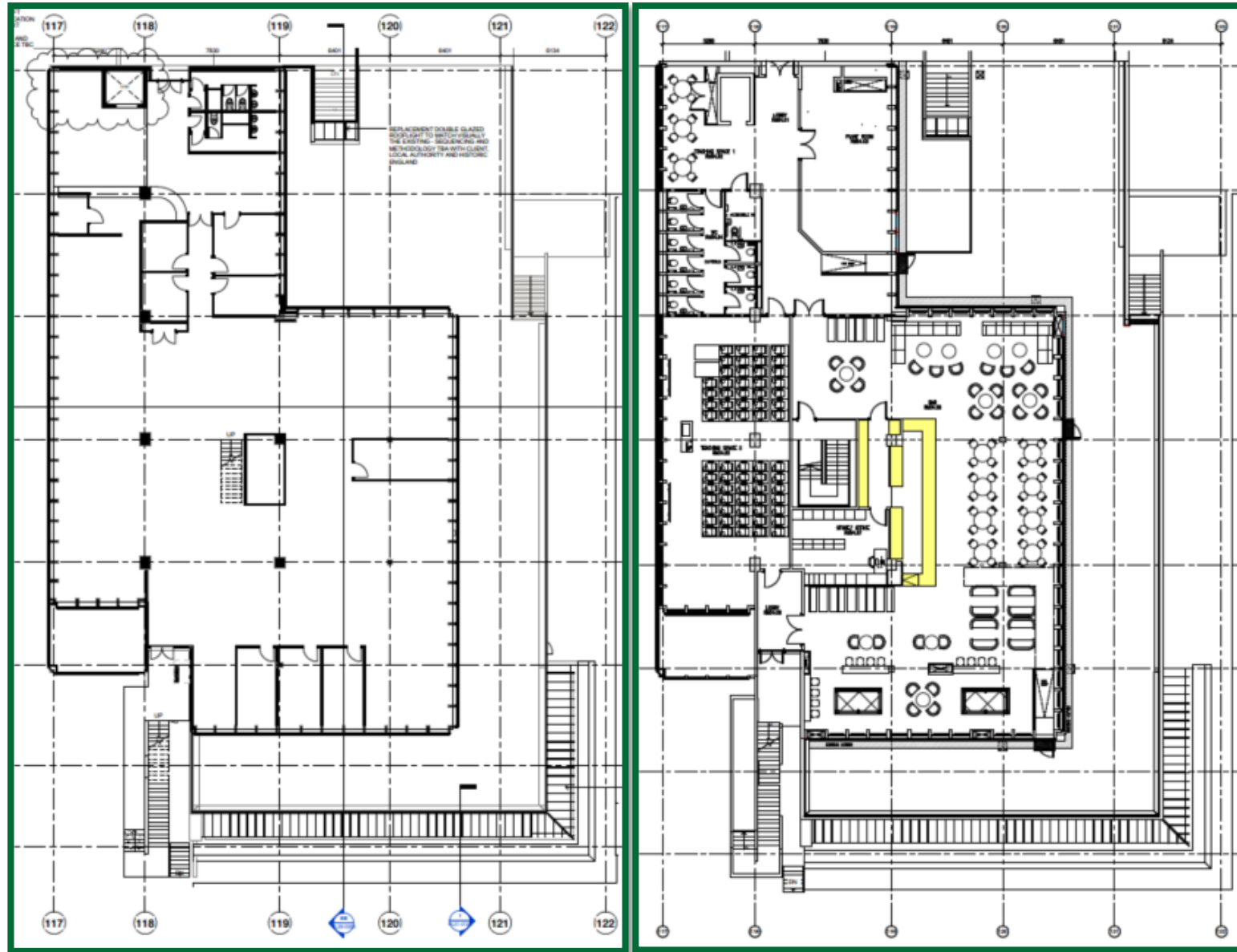
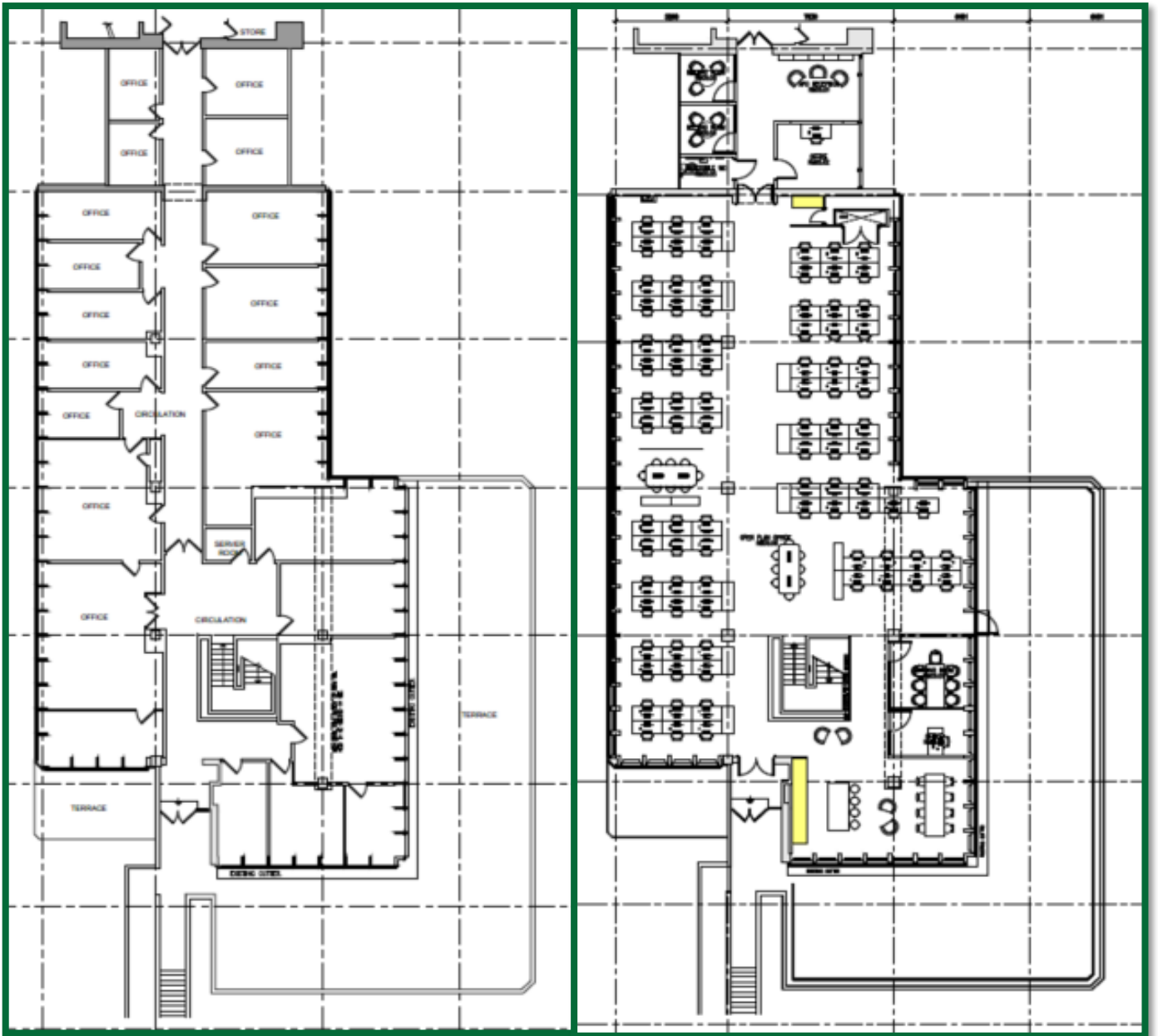


Figure 2: Existing and Proposed Level 4 Layout

- 4.3. The existing layout is open plan. The proposals will include the reconfiguration of the space to create a new Student Union Bar and teaching spaces. This will include the addition of new partitions. The partitions not only divide the space to allow it to contain two distinct purposes (teaching spaces and a Student Union Bar), they will also have acoustic properties to insure that ambient noise from the student bar will not impact on the teaching spaces, or the staff spaces above at Level 5.
- 4.4. The approved lift will open onto this floor. Around this area will be some touch down spaces and free standing seating and tables. A new plant room is proposed to be provided at this level this will be accessed off the entrance corridor to the Wing A. The Student Union Bar will wrap around the staircase (which serves Level 4 and 5 only), with new teaching space provided on the other side of the staircase.
- 4.5. New toilets including a disabled toilet will be provided at this level.

Level 5

- 4.6. The existing and proposed layout at Level 5 is shown in The proposals are for an open plan layout at Level 5 of Wing A. This will provide new staff office space (which is currently provided at Level 4). The proposals include the removal of existing internal partitions on this floor. As well as the open plan areas, a couple of meeting rooms and collaboration spaces will also be provided.



4.7. Figure 3 below.

4.8. The proposals are for an open plan layout at Level 5 of Wing A. This will provide new staff office space (which is currently provided at Level 4). The proposals include the removal of existing internal partitions on this floor. As well as the open plan areas, a couple of meeting rooms and collaboration spaces will also be provided.

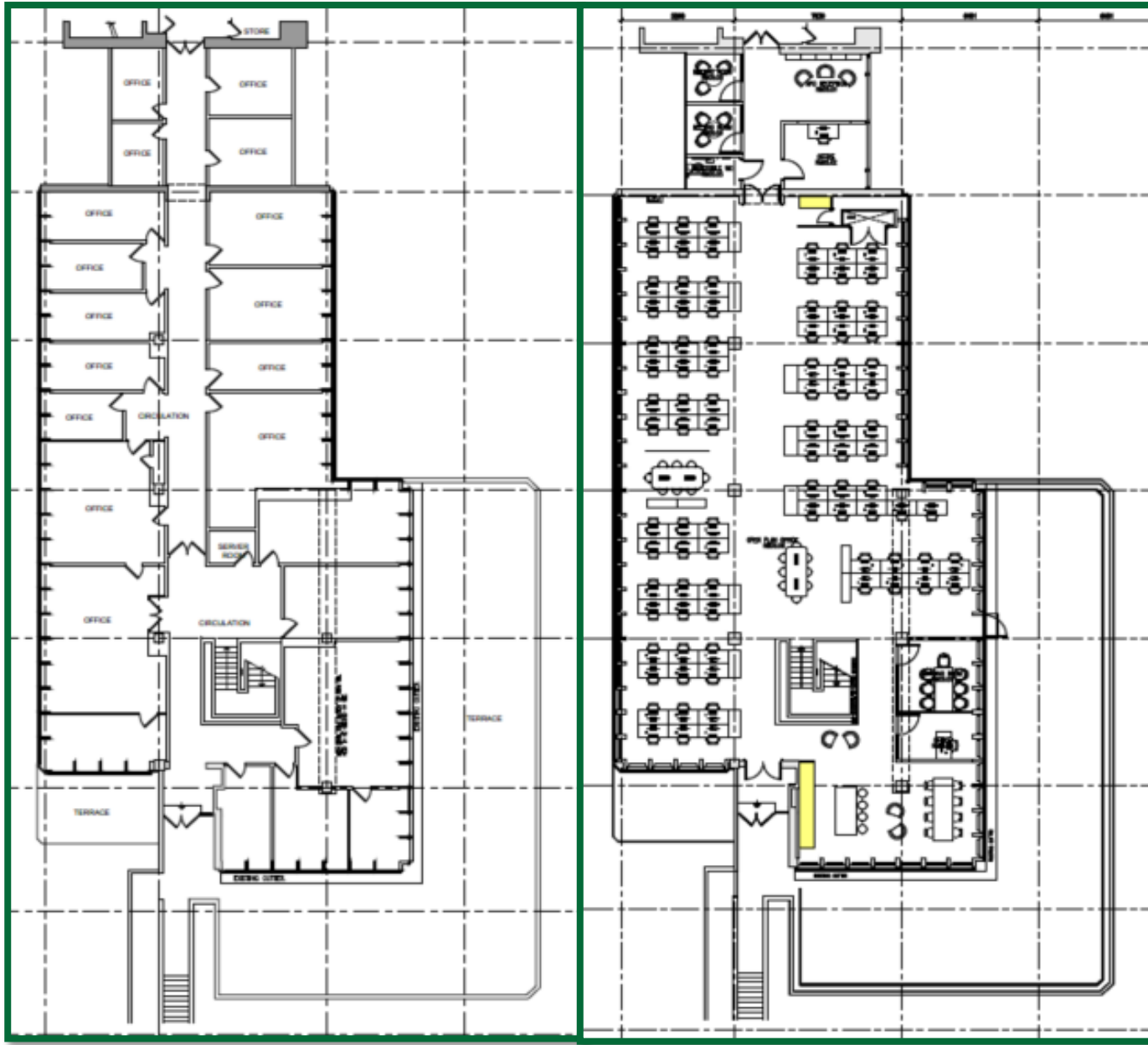


Figure 3: Existing and Proposed Layout at Level 5

Refurbishment and Redecoration

- 4.9. 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.

Servicing

- 4.10. The proposals include a new servicing strategy which will include new wiring, ventilation, plumbing and lighting. A plant room is proposed at Level 4. A new riser will be provided between Levels 4 and 5.

The Staircase

- 4.11. The proposals will open up the staircase at Level 5 where currently it is partly enclosed due to the existing layout of partitions. However at Level 4, the proposed partitions will mean that Level 4 is no longer open plan and the staircase will therefore be enclosed at this level.
- 4.12. It is proposed that glazed partitions will be installed near the staircase to ensure that the feeling of lightness and openness remains on this floor.

External Alterations

- 4.13. The proposals include a number of external alterations, including:
- Installation of external louvres to serve the new plant room.
 - Replacement of the roof light which projects onto the Level 4 terrace, and serves to provide light to the staircase leading from Level 4 down to Level 3.
 - Installation of c.50mm insulation on the Level 4 and 5 terraces to provide insulation to the ceilings of the levels below. The addition of this insulation will result in an uplift of the finished terrace floor level of c.50mm. The existing paving slabs will be lifted, cleaned and re-laid.
 - Further to the above, the existing hand rail surrounding the perimeter of the terrace will be required to be raised to ensure it is a safe and practical height. The existing metal rail will be retained, repaired and raised.
 - Relocation of one existing set of doors onto the Level 4 terrace, and the installation of additional new doors to provide better access to the terraces at Level 4 and 5. Where glazing panels are removed to create the new opening, they will be re-used where the existing set of doors will be removed.
 - Removal of existing plant units located on the terrace at Level 4.

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.

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 to present the masterplan concept.
- 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 cores and central spinal corridors.
- 5.4. The principle of reconfiguration was accepted.

Phase 1B Pre-application Meetings

- 5.5. A series of three pre-application meetings have been held with Camden to discuss the Phase 1B works.
- 5.6. These pre-application meetings have included a site walk around, in which the officer highlighted key areas of significance. The following key elements of design were discussed in detail during the meetings:

- **The staircase serving Levels 4 and 5** – The officer highlighted that the staircase had some significance and was a nice feature on these two levels. The officer raised some concerns that the approach to the staircase at Level 4 would cut off the stair from the remainder of the space. Although the proposed layout on Level 5 would open up the top of the stair. Therefore the design team sought a revised solution to the partition layout at Level 4 to ensure that the staircase was not entirely encased with no visibility through to it. The solution integrates partly glazed partition panels around the staircase, appropriately framing the stair case without having the effect of incarcerating it. At the third pre-application meeting held on 24 May, this was considered an acceptable solution by the officer.
- **Insulation on the Level 4 and 5 terrace** – The officer understood the need to introduce insulation at Levels 4 and 5, resulting in an inevitable uplift of finished floor levels to these two terraces. The officer requested that drawn detail showing how the elevated floor levels would relate to the external stairs leading down off the Level 4 terrace, and the junctions with elevations and doorways was submitted in support of the application. This detail has been provided and agreed with the officer. The need to raise the handrail accordingly was also discussed. The officer approved of the proposals to re-use and make good the existing metal handrails, extending the uprisers to increase the height of the railings.
- **Installation of new doors on Level 4 and 5 leading onto the terrace** – The officer did not raise any concerns with regards to the introduction of new doors to improve access from Levels 4 and 5 to the terraces. The officer supported the relocation of the displaced glazing panels elsewhere on the façade where needed, for example where an existing door is to be removed and relocated.
- **Ceiling treatment** – The officer raised some concerns with regards to the initial proposal for an acoustic foam treatment that was to be applied to the ceiling above the bar area, considering this to be too textured. It was agreed that the final solution could be agreed via condition.
- **Servicing strategy** – The officer raised some concerns with regards to the proposed removal of the ceiling planks within the existing corridor at Level 5. However these have

reached the end of their serviceable life and so a like for like system is proposed with planks of the same proportions proposed to run down the spine of Level 5. This solution was accepted by the officer.

- **Secondary glazing and new doors** – The officer supported the secondary glazing solution which will be the same as that approved for Phase 1A by condition.

4.14. Overall over the course of the three pre-application meetings, the above detailed areas were worked through with the officer to ensure that an appropriate solution was found prior to submission.

Enabling and Strip-out works

5.7. At the third meeting with the Design and Conservation Officer at LB Camden on 28 May 2018, enabling works were discussed.

5.8. Following the meeting, demolition drawings were provided to the officer to demonstrate the extent of strip-out works that were proposed.

5.9. It was agreed with the officer that subject to agreement to these drawings, then the strip out works could commence prior to the grant of listed building consent.

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 (2016); and,
- Camden Local Plan (2017).

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

- Bloomsbury Conservation Area Appraisal and Management Strategy (2011);
- Camden Planning Guidance 1: Design (2015, updated 2018), 3: Sustainability (2015, updated 2018);
- Draft National Planning Policy Framework (2018); and,
- Draft London Plan (2017)

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. 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".

7.4. The Draft London Plan sets out in Policy E8 'Sector growth opportunities and clusters' that "London's higher and further education institutions and their development across all parts of London should be promoted".

Applicant's Response

7.5. The proposals are for internal and minor external works to an existing educational building in an area surrounded by similar institutional and higher educational uses. The external changes are minor alterations only with little visual impact or wider amenity impact, and therefore it is considered that the proposals are suitable and will not impact on residential uses or their amenity and services.

7.6. The proposals will optimise the existing spaces on levels 2, 4 and 5 of the west wing. The proposals will create improved teaching and learning facilities, lecture theatres, social break-out areas, staff offices and will include the relocation to the Student Union Bar, all 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.

7.7. The alterations to the façade to include additional doors, general improvements to the terrace (including the addition of moveable furniture) and the relocation of the Student Union Bar to Level 4 will encourage better use of the terraces. The terraces are currently in a poor state, are unwelcoming and have limited poor access.

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. 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.

- 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. 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.

- 7.17. Camden’s Design CPG sets out that development will only be permitted where it preserves and enhances the character and appearance of a Conservation Area, where possible, preserves and enhances listed buildings.

- 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”.

- 7.19. Camden Local Plan Policy D1 ‘Design’ seeks to secure high quality design in development.

- 7.20. Draft London Plan Policy HC1 ‘Heritage conservation and growth’ states in part C:

"Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process".

Applicant's Response

Reconfiguration

- 7.21. The proposals seek to make internal alterations to the Grade II* listed building including the reconfiguration of the layout at Floors 4 and 5. The proposals also seek to amend the consented configuration of Level 2 to provide more teaching space at this level, and to relocate the approved Student Union Bar to Level 4. The works will include the installation of new partitions at Level 4 to create the Student Union Bar and teaching spaces, and the removal of existing light weight partitions at Level 5 to create an open plan office for UCL staff.
- 7.22. 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 Lasdun's original design intention was to create a flexible building, and therefore the reconfiguration of internal spaces is in line with Lasdun's vision for an adaptable building. The partitions which are to be removed at Level 5 are of light weight construction of low significance, as set out within the accompanying heritage statement and significance plans.
- 7.23. The staircase serving Levels 4 and 5 is a secondary stair (not core), but is original and has some significance. As such careful consideration has been given to its treatment and visibility in the reconfiguration of these two floors. The proposed layout at Level 5 will improve the views of the staircase serving Floors 4 and 5. At this level the staircase is currently partially obscured by partitions.
- 7.24. At Level 4 which is currently open plan, partitions are proposed to allow for the relocation of the Student Union Bar to this level. However it is proposed that the partitions will include an element of glazing to ensure visibility of the stair is maintained. The stair will remain in use and will be used by staff in the office space at Level 5 to reach Level 4. Although the views of the stair at Level 4 will be reduced, the views at Level 5 will be improved. This configuration at Level 4 is necessary to allow for the relocation of the Student Union Bar to this level. This comes with a number of benefits for users, including access to a larger terrace, increasing use of the Level 4 terrace, and better access for users of the bar who currently negotiate stairs to reach Level 3, as well as access to high quality new teaching space. Overall therefore, the partial obscuration of the stair at Level 4 is considered to be outweighed by the benefits to users as a result of the relocation of the Student Bar and provision of high quality new teaching space.
- 7.25. 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.
- 7.26. 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.

Glazing and Fenestration

- 7.27. 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. Full details of the secondary glazing have been submitted in support of this application. These details were approved via condition for the Phase 1A works, which set a precedent for the Masterplan.
- 7.28. It is considered that the installation of secondary glazing 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.

- 7.29. The Heritage Statement considers this proposal to result in less than substantial harm that is outweighed by the benefits of significantly improving environmental performance.
- 7.30. The proposals also include the replacement of the skylight to the exterior on the Level 4 terrace. The replacement will be like for like, with the exact detail to be confirmed at a later stage. The existing roof light is at the end of its serviceable life, and in a poor state of repair. Therefore, it is considered that the impact to the Grade II* listed building and the character of the Conservation Area as a result of this replacement will be negligible.
- 7.31. The proposals also include the relocation of an existing set of doors at Level 4 onto the terrace, and the addition of new doors at Level 4 and 5 onto the terraces. Where the existing set of doors at Level 4 will be removed, a glazing panel from elsewhere on the fenestration will replace it to reduce the loss of original fabric. The doors will be of the same vernacular as the glazing panels and the existing set of doors, with the metal frame of a colour to match and the glazing like for like. Although the proposals will result in the removal of a couple of glazing panels, where possible these will be relocated elsewhere on the façade to minimize loss of original fabric. The much improved access onto the currently underused terraces is considered to be of significant benefit to the building and its users, and as such outweighs any harm caused by the removal of a couple of existing windows panels.
- 7.32. The proposals include the addition of some louvered panels which will serve the plant room at Level 4. These will be located on a part of the façade which has minimum visibility in longer distance views of the building, being tucked on the side of the wing close to the core. The louvres will match those used elsewhere on the building and will be of a suitable colour and materiality to suit the fenestration.

Refurbishment and Redecoration

- 7.33. The existing building is tired and redecoration will reinvigorate the areas. The proposals are seeking to provide high quality teaching, learning, social and staff spaces, in line with Lasdun's original vision. This will ensure the continued optimal use of the listed building for its original purpose.
- 7.34. Redecoration will be carried out sympathetically, where exposed concrete is present, this will be made good where required. The materiality of furnishings and fixings will be similar to that in Phase 1A. The proposals include new flooring, ceiling treatments and loose furniture. All of which will bring the building up to date and suitable to modern day higher education requirements.
- 7.35. 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

- 7.36. At the heart of the NPPF is the presumption in favour of sustainable development.
- 7.37. 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.
- 7.38. 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.
- 7.39. Camden's Sustainability CPG recognize that energy efficiency measures for existing buildings will be bespoke to the building and that sensitive improvements can be made to historic buildings.

Applicant's Response

- 7.40. This listed building consent application is accompanied by an interim Sustainability Statement.
- 7.41. 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 1B works will contribute towards providing a more sustainable historic building, and how this has been considered from the outset of the works.
- 7.42. A BREEAM refurbishment and fit out assessment (2014) will be submitted as part of a 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.
- 7.43. A pre-assessment score of 77.5% is targeted ('excellent').
- 7.44. In Phase 1, the installation of new and replacement secondary glazing will significantly contribute to this target. In Phase 1B the addition of insulation on the Level 4 and 5 terraces will also contribute to improving the buildings thermal performance.
- 7.45. 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.
- 7.46. 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.
- 7.47. Such improvements will also contribute to the improvement of user amenity, including insulation from noise as well as thermal, and light and air quality.
- 7.48. 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 BREAAM Excellent requirements, the UCL Sustainable Building Standards, Building Regulations and local policy requirements.

8 Conclusions

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

"Refurbishment of Levels 2, 4 and 5 in Wing A at the Institute of Education, 20 Bedford Way including: reconfiguration of internal layouts to allow for the installation of a new student bar, provision of new teaching and study spaces, staff office spaces and associated facilities; refurbishment works including the installation of secondary glazing and a new servicing strategy; addition of new louvres to external façade; installation of new doors to access external terraces at Levels 4 and 5; replacement of the roof light serving stairs to the lower floors at Level 4; and, installation of insulation resulting in the raising of the finished terrace level (including enclosing railings) at Level 4 and 5 by 150mm".

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 1B 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. Phase 1A already has listed building consent and is currently being implemented. A number of details have been agreed at this first stage which set the precedent for later stages of the Masterplan, including this Phase 1B planning and listed building consent. Details previously agreed include the secondary glazing, new doors and approach and treatment of painted ceilings, and concrete surfaces.

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 following a series of pre-application meetings.

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.
- Increased accessibility of currently underused terraces at Level 4 and 5.
- Optimised use of underutilised spaces within the west wing at levels 2, 4 and 5.
- Provision of new high quality teaching, learning, staff offices 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 removal of a couple of glazing panels to allow for the installation of new doors and the partial enclosure of the staircase at Level 4).

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



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