

29 March 2019

Planning Department
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall, Judd Street
London
WC1H 9JE

FAO Antonia Powell

Your ref: PP-07707473

Dear Sir, Madam,

**University College London – Institute of Education, 20 Bedford Way, London, WC1H 0AL
Full Planning Permission for the replacement of external lamp posts within the rear
forecourt.**

On behalf of our Client, University College London ('UCL') ('the applicant'), we hereby submit to the London Borough of Camden ('LB Camden') an application for full planning permission for the removal of seven existing lamp posts and the installation of seven new lamp posts within the rear forecourt area of the Institute of Education ('IoE'), 20 Bedford Way.

The description of development is:

"Alterations to the external lighting arrangement at Institute of Education, 20 Bedford Way comprising the removal of 3 existing lamp posts located in the beds of the rear forecourt and the installation of 7 new lamp posts around the rear forecourt."

Site Location and Description

The application site is located within the UCL Bloomsbury Campus. 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).

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. The building is in D1 use, in keeping with its location on the UCL Bloomsbury Campus, and its original purpose.

This application relates to external lighting within the rear forecourt area of 20 Bedford Way only (please refer to architectural drawing number 1717-ES-1001, the 'Site Block Plan'). This area forms the main rear entrance to the building leading from Woburn Square. It comprises a large paved area with railings flanked by the main building on the south and east sides.

Context to the Application

20 Bedford Way comprises a large building of circa 27,000 sqm of D1 and associated ancillary floor space. UCL merged with the existing occupiers, the Institute of Education, in 2014. 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 seeking to make improvements to the site. Such improvements ensure that buildings across campus meet the level of expectation of students and staff at UCL, at the same time supporting UCL's global competitiveness.

UCL has developed a masterplan for the refurbishment and optimisation of the IoE. Phase 1 of this masterplan has now been delivered, and has provided new teaching space, student facilities, a student bar, and staff offices within Levels 2-5 of Wing A of the building, and at Level 3 between Cores B and C. With Phase 2 of the Masterplan still to be finalized, UCL is continuing to implement minor works to improve facilities within the building.

This application is for the replacement of seven existing external lamp posts located within the rear forecourt of 20 Bedford Way. The existing lamp posts are currently in a tired state of repair and need to be replaced. The proposed replacement lamp posts will improve the quality of lighting in the area, which is one of the main entrances into the IoE. The proposals will enhance the quality of the public realm around the IoE and improve the safety of students, especially at night. This will help bring the facilities up to an acceptable, modern standard.

Relevant Planning History

Table 1 below sets out the recent relevant planning history of the site. Two of the applications relate to the implementation of Phase 1 of UCL's Masterplan for the wider building. Phase 1 was brought forward in two parts, Phase 1A (approved in March 2017) and Phase 1B (approved in November 2018). The most recent application relates to refurbishment of the washrooms at Level 1 of the IoE.

The proposed alterations to the external lighting sits outside of the scope of Phase 1 of the Masterplan.

Application Reference No.	Application Description	Status
2019/0547/L	The reconfiguration and refurbishment of the Level 1 washrooms.	Pending Consideration.
2018/3322/L and 2018/2874/P	Refurbishment involving internal and external changes to Levels 2, 4 and 5 of Wing A of the GII* listed Institute of Education building, including: a new student bar, new teaching and study spaces, staff offices and associated facilities, the installation of secondary glazing and a new servicing strategy, new louvres to external facade; new doors to access external terraces at Levels 4 and 5; the replacement of a roof light at Level 4; and the insulation of the terrace at Level 4 and 5.	Approved – 14 November 2018.
2017/2543/L	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.	Approved – 30 March 2017.

Table 1: Recent and Relevant Planning History

The Proposals

Description of Development

This application seeks planning permission for the replacement of seven lampposts within the outdoor forecourt area of the IoE. The description of development is as follows:

"Alterations to the external lighting arrangement at Institute of Education, 20 Bedford Way comprising the removal of 3 existing lamp posts located in the beds of the rear forecourt and the installation of 7 new lamp posts around the rear forecourt."

Please refer to the proposed external lighting layout (drawing 1717-ES-101) for more information on the External Lighting Layout.



Image 1: Existing Lamp Post

Relative Lighting Levels

The below figures are extracted from the supporting Product Data Sheet (ref. 88977). These figures provide an indication of the relative lighting levels of the seven replacement lamp posts:

- Module connected wattage 19.2 W
- Luminaire connected wattage 23 W
- Rated temperature $t_a = 25\text{ }^\circ\text{C}$
- Ambient temperature $t_a \text{ max} = 65\text{ }^\circ\text{C}$

Pre-Application Discussions

Pre-application discussions took place with LB Camden planning officer, Gavin Sexton, and conservation officer, Antonia Powell, on 5 December 2018. At this meeting, the background and need for the proposals was explained and presented. The officers were supportive of the proposed works. The officers confirmed that listed building consent was not required for the works.

On 1 February 2019, it was confirmed by the planning officer that a detailed lighting assessment would not be necessary for this application.

Planning Policy Considerations

This section of the letter sets out the key policies in relation to heritage and design and assesses the proposals against these.

Heritage and Design

The NPPF (2018) states that proposals, which cause harm to a heritage asset such as a listed building, must be suitably justified in accordance with the level of harm caused.

Policy 7.8 'Heritage Assets and Archaeology' of the adopted London Plan (2018) notes that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

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 the Council will not permit substantial harm to a designated asset.

Camden Local Plan Policy D1 'Design' seeks to secure high quality design in development. This includes development that: respects the character of the heritage asset; enhances the heritage assets in accordance with Policy D2 'Heritage'; and, is inclusive and accessible for all.

Applicant Response

The site is located within the Bloomsbury Conservation Area and adjacent to a Grade II* listed building, 20 Bedford Way. The proposals are not considered to impact on the character or setting of the conservation area, or the significance or setting of neighboring heritage assets. The proposals are limited in their scope and relate to just the outdoor forecourt area described. The new lamp posts will replace existing lamp posts and as such it is not considered that the proposals will have a visual impact.

In recognition of that the forecourt area is located within the boundary of 20 Bedford Way, the removal, replacement and installation of the lamp posts will be sensitively carried out.

The design of the replacement lamp posts will be modern, but has been selected to positively contribute to the area, the setting and surroundings. The light will improve the aesthetics of the area at night.

The proposals seek to upgrade these facilities to improve the overall quality of the public realm and student experience. Overall, the proposed works will not cause any harm to the significance of the listed building and are considered to comply with the heritage and design policies outlined above.

Application Submission

In addition to this covering letter and planning policy appraisal, this planning application comprises and is supported by the following documents:

- Application Forms and Certificates prepared by Deloitte;
- Site Location Plan prepared by Mace (UCL-IOE-0100-000-XX-DR-A-60-1001);
- Site Block Plan prepared by Fowler Martin (1717-ES-1001);
- Proposed Plan (External Lighting Layout) prepared by Fowler Martin (1717-ES-101); and,
- Product Data Sheet prepared by BEGA (88977).

We trust that you have all the information you need to validate the application. Should you have any queries with the application, please do not hesitate to contact my colleagues Ellie Bird (ebird@deloitte.co.uk / +44 20 70073891) or Dena Dabbas (ddabbas@deloitte.co.uk / +44 20 70072134).

Yours sincerely,



John Adams
Deloitte LLP