

Institute of Education, 20 Bedford Way Planning Statement

December 2019

1 Introduction

Introduction

- 1.1. On behalf of our Client, University College London ('UCL'), this planning statement has been prepared in support of a full planning and listed building consent application for refurbishment works at the Institute of Education ('IoE'), 20 Bedford Way, WC1H 0AL. The application is seeking planning and listed building consent for:

"Minor alterations and refurbishment works to selected areas of the Institute of Education, 20 Bedford Way including: works to Cores A, B and C including the provision of new sanitary facilities, replacement of servicing, addition of new risers and new access panels to the existing risers within the Cores and installation of secondary glazing and obscure film to selected glazing panels within these areas; alterations to the existing plant enclosure on the roof and the installation of a new chiller unit within this enclosure; and, replacing the existing mezzanine levels in the double height observation and archive rooms at level 4 and 5 with a new floorplate and associated works".

- 1.2. The proposals are for the second phase of the IoE masterplan which UCL has developed since acquiring the building from the University of London ('UoL'). This application is for Phase 2A of the Phase 2 works. More detail on the masterplan is set out on the planning history section.
- 1.3. The building comprises circa 27,000 sqm of use class D1 (higher education) floorspace. The building has been subject to a number of interventions in the past in order to improve issues such as poor circulation, poor accessibility of some areas of the building, poor thermal control and inefficient organisation of internal spaces. However, these interventions have been ad-hoc and have lacked a coherent, planned approach. The roll out of UCL's IoE masterplan seeks to address this.
- 1.4. The building presents a considerable opportunity for UCL to deliver new D1 floorspace, and in particular teaching space, in a currently under-utilised building. The building is also in need of modernisation in order to bring it up to modern standards for D1 provision. Phase 1 of the masterplan has already been implemented and has been successful.
- 1.5. This planning and listed building applications focus on the infrastructure replacement, sanitary upgrade and enabling works which will enable the remainder of the Phase 2 works to come forward. The additional Phase 2 works will bring forward the refurbishment of larger areas of the floorplate.
- 1.6. The proposals are phased in order to streamline the programme of works and minimise disruption to students and staff working and studying within the building. The phased approach to the refurbishment of the building has been agreed with the Local Planning Authority.
- 1.7. This Planning Statement sets out the justification for the proposed development and provides an assessment of the proposals against the relevant planning policies.

The Applicant – University College London

- 1.8. UCL is London's leading multidisciplinary university, with over 13,360 staff and 42,100 students. UCL provides excellence and leadership in teaching and research, was ranked eighth in the QS World University Rankings 2020, and is among the top 20 universities ranked by The Times (14) and The Guardian (10).

Application Documents

1.9. This application comprises of:

- Application Form, certificates and notices – (prepared by Deloitte).
- Site Location Plan – (prepared by Overbury)
- Site Plan - (prepared by Overbury)
- CIL Questions Form – (prepared by Deloitte)
- Design and Access Statement – (prepared by Penoyre & Prasad)
- Architectural Drawings (including existing, demolition and proposed plans, sections, roof plans and external and internal elevations, detailed drawings and reflected ceiling plans) (prepared by Overbury)
- Planning Statement – (prepared by Deloitte)
- Heritage Statement (prepared by Alan Baxter Associates)
- Structural Survey and Accompanying Drawings (prepared by Train & Kemp Consulting Engineers)
- Schedule of Works - (prepared by Overbury)
- Acoustic Report – (prepared by BuroHappold Engineering)

Structure of Planning Statement

1.10. 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 addresses these.

1.11. The statement comprises the following chapters:

- Chapter 2: Site Context;
- Chapter 3: Background to Application;
- Chapter 4: The Proposals;
- Chapter 5: Pre-application consultation;
- Chapter 6: The Development Plan and Policy Designations;
- Chapter 7: Planning Policy Considerations;
- Chapter 8: Benefits of the Proposals; and,
- Chapter 9: Conclusions.

2 Site Context

Site Location and Description

- 2.1. The site is located in the London Borough of Camden ('LBC'). It is located within Bloomsbury and on the south eastern edge of the UCL Bloomsbury Campus.
- 2.2. The site 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, to the west by the Woburn Square terraces and the School of Oriental and African Studies (SOAS), another Lasdun designed building.
- 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.
- 2.5. The site comprises part of the Grade II* listed IoE Building. The building was designed by Architect Sir Denys Lasdun and Partners and completed in 1977. It was listed in December 2000 (listing reference 1246932).
- 2.6. An extract of the listing description is included below:

"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."

- 2.7. 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 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. This application relates to the central part of the building, No. 20 Bedford Way.
- 2.8. 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.
- 2.9. 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.

- 2.10. This planning and listed building consent application relates to 20 Bedford Way only, and specifically cores A, B and C and selected areas of the floorplate between these cores. Please refer to the site plan and Design and Access Statement.
- 2.11. 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, student residential and office uses in the surrounding area. The immediate surrounding buildings are generally in D1 use and occupied by Higher Education providers, including UCL, UoL and SOAS.
- 2.12. 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.

Planning History

- 2.13. The site has an extensive planning history including various applications for minor internal alterations. A phased masterplan is being rolled out for the refurbishment of 20 Bedford Way. To date, Phase 1 of the application has been granted planning and listed building consent.
- 2.14. Phase 1A of the masterplan received planning and 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, new doors, ceiling treatment and internal finishes.
- 2.15. Phase 1B of the masterplan was granted planning and listed building consent on 14 November 2018 (reference 2018/3322/L/ or 2018/2874/P). Phase 1B comprised of internal and external changes to Levels 2, 3 and 5 of Wing A and included a new student bar, new teaching and study spaces, staff offices and associated facilities. Phase 1B continued the refurbishment of these areas in line with the details approved in Phase 1A.
- 2.16. The works pursuant to Phase 1A and 1B applications have now been fully implemented and have been successful in upgrading these areas of the building. Please refer to the Design and Access statement which includes photos of the completed Phase 1 works.

3 Background to Application

Project Background

- 3.1. 20 Bedford Way comprises a large building of circa 27,000 sqm of D1 and associated ancillary floorspace. UCL merged with the existing occupiers, the Institute of Education, in 2014. This recent merger has provided opportunity for UCL to continue delivering the aims of its masterplan across the wider Bloomsbury Estate.
- 3.2. As the occupier and long term custodian of this Grade II* listed building, and with the aims of the Bloomsbury masterplan in mind, UCL is seeking to make improvements to the building.
- 3.3. The building was in a poor state of repair and underutilised. The building also contains legacies of projects implemented at specific times to address specific issues, and there has been a clear lack of site wide visioning and a holistic approach.
- 3.4. Therefore, UCL is implementing a masterplan for the building. This holistic approach to the building has allowed UCL and their design team to identify areas in need of refurbishment in the short, medium and long term and opportunities for improvements to the building, its functionality, efficiency and use of space.
- 3.5. With circa 27,000 sqm of D1 floorspace, the building presents significant opportunities for UCL to provide both improved and new teaching and learning spaces, through refurbishment and reconfiguration of the existing building.
- 3.6. With the recent completion of Phase 1, UCL has demonstrated considerable commitment and investment to improving and refurbishing the building, in order to ensure its longevity into the 21st Century.
- 3.7. 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; and,
- 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

- 3.8. 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. This phased approach also limits the impact and disruption to the existing student experience and provision of teaching and learning facilities, where existing provision is already under considerable pressure.
- 3.9. Consequently, to limit disruption to the existing D1 provision and pressure on already encumbered D1 floorspace elsewhere on Campus, UCL has taken a phased approach to the implementation of the master planning works at 20 Bedford Way.
- 3.10. This planning and listed building consent application relates to Phase 2A of the refurbishment and improvement works only.
- 3.11. Following the master-planning process and significant investigation into the condition of the building, UCL has proposed several years of works across multiple phases to refurbish and optimise 20 Bedford Way. The works include a complete replacement of the mechanical and electrical services which are at the end of their serviceable life, 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.
- 3.12. This application is for Phase 2A of the works. Phase 1 of the masterplan has recently been implemented and completed. It was split into 2 sub-phases, 1A and 1B. Phase 1 focused on the underutilised area in Wing A at levels 2-5 and some areas of the main floorplate between cores B and C. Phase 1 focused on addressing the mechanical and engineering strategy early on in the implementation of the masterplan and also set the design approach for the building, in particularly in relation to the secondary glazing, doors, ceilings, measurements and fit out. Phase 1 has delivered a new student bar to maintain student experience, new high quality teaching spaces, breakout spaces, accessible facilities, a new lift to access lower floors, new staff office space and introduced energy saving measures to improve the energy performance of the building.
- 3.13. Phase 2 is now coming forward. It has also been split into 2 sub-phases, 2A and 2B. Phase 2A comprises of works that will enable Phase 2B to come forward. Phase 2A focuses on the mechanical and electrical strategy and will also address the health and safety concerns in the cores. Works will focus on the cores and will deliver new sanitary facilities for staff and students and will include a full strip out of existing services and installation of new services. Phase 2B will include works to the floorplate between the cores and will follow the design approach agreed in Phase 1. Phase 2A needs to be bought forward ahead of Phase 2B in order for UCL to implement the works with an efficient programme and to minimise disruption to staff and students using the building.

4 The Proposals

Description of Development

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

"Minor alterations and refurbishment works to selected areas of the Institute of Education, 20 Bedford Way including: works to Cores A, B and C including the provision of new sanitary facilities, replacement of servicing, addition of new risers and new access panels to the existing risers within the Cores and installation of secondary glazing and obscure film to selected glazing panels within these areas; alterations to the existing plant enclosure on the roof and the installation of a new chiller unit within this enclosure; and, replacing the existing mezzanine levels in the double height observation and archive rooms at level 4 and 5 with a new floorplate and associated works".

- 4.2. These proposals relate mainly to the cores A, B and C of the building as well as selected mezzanine floors at levels 4 and 5.

Description of Proposals

Mezzanines

- 4.3. 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.
- 4.4. At Levels 4 and 5 in Cores C and B, there are two double height spaces which have non-original mezzanine floors installed. These spaces have recently been used as observation rooms. The proposals include the removal of these existing mezzanine floors and associated stairs. The proposals include for the installation of a new floorslab at a slightly revised level in order to create new teaching spaces, both at Level 4 and Level 5 in each of the areas. In order to access both levels from the Core, new openings will be required from the lobby area which will be fitted with doors.
- 4.5. At Levels 2 and 3 in Core C, there are existing storage areas provided with metal grill floors. The proposals include the removal of the existing grill floors and associated steps, and the installation of a floor at a revised height. Again, in order to create a new teaching space in this area, new openings will be required into the lobby areas which will be fitted with new doors.
- 4.6. To accommodate the new purpose of these areas as teaching space, associated mechanical engineering works are required to ensure ventilation is adequate, and the areas are fit for purpose.
- 4.7. The proposals will result in an uplift of 12 sqm of D1 floorspace in these areas. However, the perceived increase in useable floorspace will be considerably more, as the spaces are currently difficult to access and under-utilised.

Minor alterations to layout and reconfiguration of the sanitary facilities

- 4.8. Within Cores A, B and C the existing poor quality sanitary facilities are to be removed, reconfigured and replaced with new. The finish of the facilities will match those installed as part of Phase 1. In some areas the reconfigured facilities will require additional space which will be taken from the floorplate between the Cores and will require the removal of a limited number of partitions. However, this will ensure that the facilities provided are fit for purpose, or a high modern standard, and can accommodate fully accessible facilities.

- 4.9. All doorsets in the core areas will be replaced with new laminate-faces and oak-lipped doorsets in line with those installed under the Phase 1 works. Within the core areas, redecoration works will be carried out to match the finishes in the Phase 1 areas.

Services (Mechanical and Engineering Strategy)

- 4.10. In order to facilitate the new teaching spaces, and the forthcoming refurbishment of the floorplates between the cores (forming part of Phase 2B), the existing services need to be fully renewed. The existing services have reached the end of their serviceable life and require replacing and upgrading.
- 4.11. The proposals include works to create a new riser within the core areas to accommodate the new services. This will necessitate opening up a small area of the floorplate across all levels.
- 4.12. Works also include creating new openings into the existing main riser in the Core. These openings are required to ensure the health and safety of workers servicing the building. The current access arrangements into the core are not safe and are below standard.
- 4.13. The replacement and upgrade of the services in this Phase is key to enabling the refurbishment works in the later phases of the Masterplan to go ahead. The works will also future-proof the building, improve the working and studying conditions for students and staff, and work towards improving the energy performance and sustainability credentials of the building.
- 4.14. Full details of the works are set out in the schedule of works and the architectural drawings.

External Alterations

- 4.15. In selected glazing panels, secondary glazing is proposed. This secondary glazing will match the specification of that approved and installed in Phase 1. This will have minimal visible impact externally.
- 4.16. On the roof, minor alterations are proposed to an existing plant enclosure. A portion of the roof of the enclosure will be removed to allow for the replacement of plant equipment. An acoustic report has subsequently been prepared and is submitted in support of this application.
- 4.17. To accommodate the new teaching spaces at the lower levels and to ensure the spaces meet minimum requirements of health and safety and fire safety, new smoke ventilation panels are required to be installed. These panels will be located on the Bedford Way elevation, and will be installed in the concrete core. The panels will be small in size and will be located behind existing gates and will not be visible from the street.

5 Pre-application Consultation

- 5.1. The proposals have been subject to formal and informal pre-application discussions with the London Borough of Camden.

Principle of Refurbishment

- 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 cores and central spinal corridors.
- 5.4. The principle of a phased masterplan approach was accepted.
- 5.5. Initial engagement and meetings were held with Camden, Historic England and the 20th Century society.

Phase 2A Pre-Application Meetings

- 5.6. A series of two pre-application meetings, including a site visit, have been held with Camden to discuss the Phase 2A works.
- 5.7. At these meetings, the proposals were discussed in detail with the officer. The design intent and finishes were agreed, with recognition that the finishes in Phase 2 would continue the design intent of Phase 1, which has been successful. Officers recognised the need to upgrade the services, and facilities.

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) (2019) 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 “*meeting the needs of the present without compromising the ability of future generations to meet their own needs*”. Sustainable growth is about positive growth – making economic, environmental and social progress for future generations and the NPPF explains that development which 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 (2017);
- Camden Local Plan (2017);
- Camden Policies Map (2019); and,
- Camden Site Allocations Plan (2013).

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: Design (2019), 3: Energy Efficiency and Adaptation (2019); and,
- Draft London Plan (anticipated adoption early 2020).

Site Allocations

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

- Central London Area (Camden Policies Map, 2019);
- Bloomsbury Conservation Area (Sub-area 3: London University/British Library) (Camden Policies Map, 2019);
- Central Activities Zone (London Plan, 2017); and,
- Designated View 5A.2 Greenwich Park Wolfe statue to Tower Bridge – Right Lateral Assessment Area (Camden Policies Map, 2019).

7 Policy Assessment

Introduction

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

- Principle of proposals and land use;
- Heritage and Design; and,
- Noise.

Principle of proposals and 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 minor refurbishment works to an existing educational building in an area surrounded by similar institutional and higher educational uses.

7.6. The proposals will optimise the provision of D1 floorspace within the building, with the creation of new teaching spaces in underutilised and poorly arranged areas. Although there will actually only be an additional 12 sqm of D1 floorspace created within the existing plan of the building, the perceived increase in useable floorspace will be considerably greater. This will allow for the creation of vital new teaching spaces for the students and staff.

7.7. The proposals are a sustainable response to the recent and increasing pressures on D1 floorspace within the wider UCL Bloomsbury Campus, and will seek to optimise existing floorspace with limited impact on the occupants of the building (through a phased approach) and no impact to surrounding occupiers in the wider area.

7.8. Overall, the Phase 2A works will facilitate an improved user experience within the building, through providing high quality, modern facilities that are befitting of the a world-class university. 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.

Heritage and Design

- 7.9. Section 16 of the NPPF (2019) 'Conserving and Enhancing the Historic Environment' sets out the key tests which proposals will need to meet in relation to their impact on heritage assets.
- 7.10. Paragraphs 189-202 are of relevance. Paragraph 192 states that in determining applications, local authorities should take account of:
- a) *"the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - b) *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
 - c) *the desirability of new development making a positive contribution to local character and distinctiveness."*
- 7.11. Paragraphs 193 – 202 specifically set out how impacts to heritage assets as a result of proposals should be considered. The NPPF sets out that great weight should be given to the assets' conservation with the level of weight correlating to the level of significance of the asset. Any harm should require clear and convincing justification.
- 7.12. Paragraph 196 states where a proposal is considered to lead to 'less than substantial harm' to the significance of a heritage asset, the harm should be weighed against the public benefits of the proposals, including where appropriate securing its optimum viable use.
- 7.13. Policy 7.8 'Heritage Assets and Archaeology' of the current London Plan 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.
- 7.14. 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 avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process."*
- 7.15. The Camden Local Plan (2017) Policy D2 'Heritage' seeks to preserve, where appropriate, and enhance Camden's heritage assets and their settings. It states the Council should resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building, and resist development that would cause harm to the significance of a listed building through an effect on its setting.
- 7.16. Camden's Design CPG sets out that the Council will make a balanced judgment having regard to the scale of any harm or loss and the significance of the asset affected, taking account of:
- The desirability of sustaining and enhancing the significance of any heritage asset/s and putting them to viable uses consistent with their conservation;
 - The positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality and health and wellbeing;

- The desirability of new development that affects heritage assets to preserve and enhance local character and distinctiveness.
- 7.17. Paragraph 3.27 focuses on the impact of proposals on the historic significance of a listed building, including its features, such as:
- Original and historic materials and architectural features;
 - Original layout of the rooms;
 - Structural integrity; and,
 - Character and appearance.
- 7.18. Camden will expect original or historic features to be retained and repairs to be in matching material and for proposals *"to seek to respond to the special historic and architectural constraints of the listed building, rather than significantly change them"* (paragraph 3.28). It states that listed building applications should be fully justified and demonstrate how the proposals would affect the significance of a listed building and why the works or changes are desirable or necessary.
- 7.19. 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.
- 7.20. The Bloomsbury Conservation Area Appraisal and Management Strategy (2011), Paragraph 5.32 states that the appearance of all buildings of historic interest (listed and unlisted) within the Conservation Area is harmed by the removal or loss of original architectural features and the use of inappropriate materials. The loss of original joinery, sash windows, porches and front doors, can have considerable negative impact on the appearance of a historic building and the area.

Applicant's Response

Internal Alterations

- 7.21. The proposals seek to make internal alterations to the Grade II* listed building including the reconfiguration of areas surrounding the cores, and the replacement of mezzanine levels with new floors. Other internal works relate to the implementation of a renewed servicing strategy, and redecoration throughout.
- 7.22. As aforementioned, the proposals have been subject to detailed pre-application discussions with Camden's planning and conservation officers. During these discussions, it was agreed that Lasdun's original design intention was to create a flexible higher education building. Therefore reconfiguration of the Phase 2A areas to suit the evolving needs of the higher education occupier is in the spirit of the original design intent to create an adaptable building.
- 7.23. The Heritage Statement submitted in support of this application and prepared by Alan Baxter Associates supports this, and 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.
- 7.24. The building was originally designed by Lasdun for D1 use, for occupation by the Institute of Education. The proposals will therefore allow for the continued use of the Heritage Asset's for its optimum viable use.
- 7.25. The proposals will include the replacement of sanitary facilities with new high quality facilities of a modern standard. Importantly, this will also include fully accessible facilities where there are currently none. This is a considerable benefit to the staff and students.
- 7.26. The refurbishment and decoration works will rejuvenate the building with a design intent that respects and showcases the high quality concrete finishes and brutalist architecture. The floor, ceiling and wall finishes will match those implemented in Phase 1, which is considered to have been very successful and is of a high

design quality. The design approach is considered to enhance the significance of the listed building and its architectural interest.

- 7.27. The proposals include works to upgrade the services in the building which have reached the end of their serviceable life. The new servicing strategy will deliver considerable benefits to both the building and the users of the building. The works will improve the energy efficiency of the building whilst retaining the overall architectural interest of the building, and, improve the environmental conditions for students and staff working in the building.
- 7.28. Other measures to improve the energy efficiency of the building include the installation of new secondary glazing panels. These panels will match that installed in Phase 1 and previously agreed with Historic England, the Twentieth Century Society and Camden. Again, the specification of the secondary glazing has been designed to respect and enhance the architectural significance of the building, showcasing the concrete mullions and bronzed glazing.
- 7.29. The proposals will result in 'less than substantial harm' as a result of new openings being required into the concrete cores. Small openings are required to accommodate the new servicing strategy, and wherever possible these will be located above the ceiling where they will have negligible impact on the significance of the building. However, new openings are required into the main riser to allow safe access to workers servicing the building. Although this will result in some less than substantial harm, it is considered that this is mitigated by the careful design of the openings with their location away from the highly significant circulation lobbies, and by the abundance of high-quality concrete finishes elsewhere in the building. It is also outweighed by the importance of ensuring the safety of workers maintaining the building in the future.
- 7.30. The removal of the mezzanine levels is not considered to impact the significance of the listed building, as these are a more modern addition. The works to reinstate the floors at a revised level will be carried out carefully. A structural report has been prepared and submitted in support of this application which demonstrates that the removal of this fabric, and the openings into the core walls will not impair the structural integrity of the building.
- 7.31. The Heritage Statement submitted in support of this application provides a full assessment of the heritage impact to the building, and the heritage benefits that are considered to outweigh this.
- 7.32. Overall, the internal works comprise an important phase of the refurbishment of the building and will result in bringing the selected areas up to modern standards and will deliver a high quality design and finish, befitting of the Grade II* listed building.

External Alterations

- 7.33. External alterations in this phase of works are limited.
- 7.34. The works to the roof of the rooftop plant enclosures will have no visual impact, and will not have any impact on the significance of the listed building, nor the character of the Conservation Area.
- 7.35. The proposed new smoke vents will also have minimal visual impact, set back from the main elevation and obscured by existing gates. Again, although there will be a small loss of historic fabric as a result of their installation, this is considered to be overcome by the benefits of providing fire safety measures to the internal spaces which they will serve. The finish of the smoke vents will be in keeping with the listed building. They will not be visible from the street, and therefore will have no impact on the character of the Conservation Area.

Summary

- 7.36. The proposals will deliver a number of public and heritage benefits that are considered to outweigh the identified less than substantial harm. The heritage benefits are identified in the Heritage Statement submitted in support of this application. The public benefits are summarised in the next Chapter of this Statement. The proposals are for a high quality refurbishment that will respect and enhance the heritage

asset. For these reasons, the proposals align with national and local policy in relation to heritage and design.

Noise

- 7.37. Paragraph 180 of the NPPF states that planning decisions should ensure that new development should mitigate and reduce to a minimum potential adverse impacts result from noise from a new development and avoid noise giving rise to significant adverse impacts on health and the quality of life.
- 7.38. Policy A4 'Noise and Vibration' sets out that Camden will seek to ensure that noise and vibration are controlled and managed.

Applicant's Response

- 7.39. This planning and listed building consent application is accompanied by an acoustic report which demonstrates that the chiller being inserted on the roof is in accordance with Camden's noise requirements. The proposals therefore comply with local policy in relation to noise and vibration and will have no impact on the amenity of local occupiers.

8 Benefits of the Proposals

- 8.1. Overall, the proposals will deliver a significant number of public and heritage benefits that will outweigh the identified 'less than substantial harm' caused by the proposed works. On this basis, the proposals meet the tests set out in the NPPF and local policy.
- 8.2. The public benefits of the proposal include:
- Provision of **new high quality teaching and learning areas** that are adaptable to new ways of teaching and learning and flexible for the future, as Lasdun intended.
 - **Optimised use of underutilised space** on Levels 2 and 3 of Core C and Level 4 and 5 of Core B and C, with minimal impact to historic fabric and no impact on the surrounding area.
 - The new teaching spaces will help **fulfil demand for high quality D1 teaching spaces in the Bloomsbury area.**
 - The new teaching spaces are **vital for UCL in terms of fulfilling the role of a higher education provider in Camden and will actively support UCL's important contribution to the expanding knowledge quarter in Camden, and the wider economic function of the London CAZ.**
 - Provision of **new and accessible sanitary facilities, improving user experience.**
 - These works will **act as enabling works for Phase 2B and the next phases of the Masterplan.**
 - **Increases accessibility to all** through providing new sanitary facilities which meet **modern standards and are accessible.**
 - **Removal of non-original features** (for example, the mezzanine floors) which are of neutral significance and installs features which are **consistent with the design** approach of the building.
 - Refurbishment and decoration **works which are respectful and enhance the significance of the listed building and its architectural interest.**
 - Aligns the building with **modern health and safety, and fire safety** standards.
 - The proposed works will have a **negligible impact** on the external appearance of the building, and will have **no impact on the character and appearance of the conservation area.**
 - Increased **investment into this important heritage asset** to ensure its viability for its original purpose into the twenty first century.
 - The works will help to **secure the future of UCL IoE** in the building, which is the **optimal viable use** for which it was originally designed.

9 Conclusion

- 9.1. This planning statement has been prepared in support of a full planning and listed building consent application for the following refurbishment works at the IoE:

"Minor alterations and refurbishment works to selected areas of the Institute of Education, 20 Bedford Way including: works to Cores A, B and C including the provision of new sanitary facilities, replacement of servicing, addition of new risers and new access panels to the existing risers within the Cores and installation of secondary glazing and obscure film to selected glazing panels within these areas; alterations to the existing plant enclosure on the roof and the installation of a new chiller unit within this enclosure; and, replacing the existing mezzanine levels in the double height observation and archive rooms at level 4 and 5 with a new floorplate and associated works".

- 9.2. The Masterplan for the IoE has been implemented with Phase 1 now complete. This application is for Phase 2A of the masterplan. The Phase 2A works focus on renewing the servicing strategy, and upgrading sanitary facilities and creating new teaching spaces within the building. The works are being brought forward in stages to minimise impact on the users of the building, and to ensure an efficient programme.
- 9.3. This application will continue to implement the design intent and approved finishes as installed in the Phase 1 areas. This demonstrates a committed approach by UCL to investing in the listed building in order to deliver high quality D1 floorspace in Camden and to improve the experience of staff and students who occupy the building.
- 9.4. The Phase 2 works will continue to optimise the underutilised building by delivering new teaching spaces with only an uplift of 12 sqm. The works will also continue to improve the energy efficiency of the building and will deliver a number of heritage and public benefits.
- 9.5. The proposals have been fully considered against relevant planning policy at National, Regional and Local level, and discussed during the pre-application stage with Camden Planning and Conservation Officers who have raised no concerns with regards to the proposed works.
- 9.6. It is considered that the public and heritage benefits that the works will deliver considerably outweigh the less than substantial harm that a couple of minor elements of the proposals will result in. This is further reiterated in the accompanying Heritage Statement prepared by Alan Baxter.
- 9.7. For these reasons, planning and listed building consent should be granted for these proposals.



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