



Institute of Education, 20 Bedford Way
Planning Statement

March 2020

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:

"Refurbishment and reconfiguration of selected areas of the Institute of Education, 20 Bedford Way, comprising: refurbishment works to the Level 1 plantroom; reconfiguration and refurbishment of Levels 5-9 in the nib and wing connected to Core A, and the Lawton Room at Level 6 adjoining Wing A; repairs and installation of insulation to the external terraces connected to these areas; installation of secondary glazing to these areas; creation of a new plant room at Level 8 Wing A and installation of new louvres to serve this plant room; refurbishment and repairs to the lobby roof on level 4 and the roof at Level 10; installation of new external gate at Level 5 of Wing A; 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 2B of the Phase 2 works. More detail on the masterplan is set out below.
- 1.3. This planning and listed building application focuses on the upgrade of teaching and office space as well as bringing the building up to modern requirements. The additional Phase 2 works will bring forward the alterations to the entrance of the buildings.
- 1.4. This Planning Statement sets out the justification for the proposed development and provides an assessment of the proposals against the relevant policies.

IoE Phased Masterplan Approach

- 1.5. 20 Bedford Way, designed by Lasdun, comprises a large building of circa 27,000 sqm of D1 (higher education) and associated ancillary floorspace and is Grade II* listed. UCL merged with the Institute of Education in 2014. This merger provided the opportunity for UCL to continue delivering the aims of its masterplan across the wider Bloomsbury Estate.
- 1.6. 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.
- 1.7. Therefore, UCL has implemented a phased masterplan for the building which is partly implemented and ongoing. 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.
- 1.8. There was a need to approach the master-planning process 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.

- 1.9. 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.
- 1.10. Phase 1 of the Masterplan has already been implemented and has been successful. This Phase sought to modernise the building, bring it up to modern standards and bring forward more D1 floorspace.
- 1.11. Phase 2A (ref. 2019/6410/L and 2019/6386/P) of the Masterplan was approved on 2 March 2020 and focused on infrastructure replacements, sanitary upgrade and enabling works which allow the Phase 2B works to come forward.
- 1.12. Phase 2C is anticipated to come forward later in 2020 and this will include the works to the entrances and the reconfiguration and refurbishment of the lobby areas at levels 3 and 4.

The Applicant – University College London

- 1.13. UCL is London's leading multidisciplinary university, with over 13,000 staff and 42,000 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 (4) and The Guardian (10).

Application Documents

- 1.14. This application comprises of:
 - Application Form, certificates and notices – (prepared by Deloitte, dated 27 March 2020);
 - Site Location Plan – (prepared by Overbury, dated March 2020);
 - Site Plan – (prepared by Overbury, dated March 2020);
 - Design and Access Statement – (prepared by Penoyre & Prasad, dated March 2020);
 - 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, dated March 2020);
 - Drawings Register (prepared by Architon, dated 25 March 2020);
 - Planning Statement – (prepared by Deloitte, dated March 2020);
 - Heritage Statement – (prepared by Alan Baxter Associates, dated March 2020);
 - Structural Report – (prepared by Train & Kemp Consulting Engineers, dated 24 March 2020);
 - Scope of Works – (prepared by Overbury, dated 25 March 2020);
 - Acoustic Report – (prepared by BuroHappold Engineering, dated 25 March 2020); and,
 - Sustainability Statement (prepared by BuroHappold Engineering, dated 26 March 2020).

Structure

- 1.15. The statement comprises the following chapters:
 - Chapter 2: The Site Context and Planning History;
 - Chapter 3: The Proposals;
 - Chapter 4: Pre-application Consultation;
 - Chapter 5: The Development Plan and Policy Designations;
 - Chapter 6: Planning Policy Considerations;
 - Chapter 7: Benefits of the Proposals; and,
 - Chapter 8: Conclusions.

2 The Site Context and Planning History

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 and 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 and accessed via Bedford Way and Woburn Square.

- 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 areas of floorplate off Core A in the Wing and nib, and the rooves and terraces.
- 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. Relevant planning history has been set out in Appendix A. It demonstrates that the site has an extensive planning history including various applications for minor internal alterations. It also includes the applications for Phase 1 and Phase 2A of the Masterplan.
- 2.14. Phase 1 has been fully implemented and is considered to be very successful. It has delivered thermal upgrades, new teaching and studying spaces, a new student union bar, and new workspace for staff.
- 2.15. Phase 2A was for enabling works and comprised of works to services mostly concentrated within the 3 cores of the building. This application is for Phase 2B and will deliver new teaching and work spaces for staff and students in the same vein as Phase 1 of the Masterplan.

3 The Proposals

Description of Development

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

"Refurbishment and reconfiguration of selected areas of the Institute of Education, 20 Bedford Way, comprising: refurbishment works to the Level 1 plantroom; reconfiguration and refurbishment of Levels 5-9 in the nib and wing connected to Core A, and the Lawton Room at Level 6 adjoining Wing A; repairs and installation of insulation to the external terraces connected to these areas; installation of secondary glazing to these areas; creation of a new plant room at Level 8 Wing A and installation of new louvres to serve this plant room; refurbishment and repairs to the lobby roof on level 4 and the roof at Level 10; installation of new external gate at Level 5 of Wing A; and associated works."

3.2. These proposals relate to the Level 1 plant room, Levels 5-9 in the 'nib' and 'wing' connected to Core A, the Lawton Room at Level 6, external terraces connected to these areas, the lobby roof of Level 4 and the roof at Level 10.

Description of Proposals

Reconfiguration and Refurbishment

3.3. 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.

3.4. On Levels 5-9 in the wings and the nibs connected to Core A as well as the Lawton Room at Level 6 adjoining Wing A, there are a large number of cellular offices. As part of the proposals, the non-load bearing walls along with all floor finishes, suspended ceilings, skirtings, underlay, raised floor pans, tiles with floor boxes, doors, frames, glazed partitions, wall linings and all associated fittings will be carefully removed. New reconfigured partitions and finishes will be installed to create new cellular offices as well as provide shared hubs, meeting rooms, lecture rooms, quiet space and break out space. The proposals will deliver facilities that are fit for purpose, of a high modern standard, and accessible. The proposals will significantly improve the experience of staff and students using the building.

3.5. A light touch strip out is being proposed in the Lawton Room of Level 6 which is connected to Core A. Existing features will be maintained and made good where possible.

3.6. On the Level 8 of Wing connected to Core A, a new plant room is being proposed. This involves the demolition of non-load bearing walls, doors, frames, glazed partitions, wall linings and all associated fixings.

3.7. All doors will be replaced with new laminate faces and oak-lipped doorsets in line with those installed under the Phase 1 works. Redecoration works will be carried out to match the finishes in the Phase 1 areas.

3.8. Secondary glazing will be installed within these spaces.

Refurbishment of the plant room on Level 1

3.9. In plant room 3/12 on level 1 it is being proposed to order to redecorate and refurbish the room on a like for like basis. A new opening will be made in an existing slab to allow for service penetrations.

External Changes

- 3.10. There will be limited external alterations as part of this phase.
- 3.11. A new external gate will be installed at Level 5 of Wing A. This will be installed into an existing opening and the finish will be bronze anodize to match the existing façade / balustrade.
- 3.12. On Level 6-9, the terraces will be refurbished. Existing ballast / pea shingle will be removed and set aside whilst new waterproofing and insulation is installed which includes work to the existing drainage, gullies and outlets. New edge protection is also being proposed.
- 3.13. On Level 8 of the wing of Core A, new louvre panels are being inserted in order to accommodate the new plant room. This is located to the rear of the building and due to its positioning on the building will have minimal impact visually.
- 3.14. Refurbishment works to the roof at Level 10 and Level 4 will also take place.

4 Pre-application Consultation

- 3.15. The proposals have been subject to formal and informal pre-application discussions with the London Borough of Camden, Historic England and 20th Century Society.

Principle of Refurbishment Works

- 3.16. 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.
- 3.17. 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.
- 3.18. The principle of a phased masterplan approach was accepted.

Phase 2B Pre-application meetings

- 3.19. A pre-application meeting was held on 26 March 2020 with the London Borough of Camden, Historic England and the 20th Century Society.
- 3.20. At this pre-application meeting the proposals were discussed in detail including works to the entrances which will come forward as a separate application. The design intent was welcomed by attendees 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.
- 3.21. Overall, the proposals comprising this application were considered uncontentious and in the spirit of Phase 1 of the masterplan.

5 The Development Plan

5.1. This section sets out the development plan and site designations which apply to the application site.

National Planning Policy Framework

5.2. The National Planning Policy Framework (NPPF) (2019) is the overarching planning policy document for England.

5.3. 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

5.4. Section 38(6) of the Planning and Compulsory Purchase Act 2004 required planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

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

- The London Plan (2017);
- Camden Local Plan (2017);
- Camden Policies Map (2019); and,
- Camden Site Allocations Plan (2013).

5.6. 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 Adaption (2019); and,
- Draft London Plan (anticipated adoption after the Mayoral election).

Site Allocations

5.7. 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).

6 Policy Assessment

Introduction

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

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

Principles of proposals and land use

6.2. 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.

6.3. 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".

6.4. 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

6.5. The proposals are for refurbishment works to an existing education building. The building sits within the 'knowledge quarter' in which there is a high density of higher education uses.

6.6. The proposals will optimise the provision of D1 floorspace within the building through providing high quality office space and teaching space for higher education use. There will be no uplift of floorspace, but the proposals will allow existing floorspace to be used more effectively.

6.7. 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.

6.8. For UCL to remain competitive as a higher education provider there is an expectation from staff and students for them to provide high quality, modern facilities which meet requirements. This helps to maintain UCL's role as a world class university which is important in maintaining UCL's role within the Knowledge Quarter and the Borough of Camden.

- 6.9. Overall, the Phase 2B 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

- 6.10. 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.
- 6.11. 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 viability; and*
 - c) *The desirability of new development making a positive contribution to local character and distinctiveness."*
- 6.12. 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.
- 6.13. 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.
- 6.14. 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.
- 6.15. 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."*
- 6.16. 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.
- 6.17. 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.
- 6.18. 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.
- 6.19. 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.
- 6.20. 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.
- 6.21. 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.

Applicant's Response

Internal Alterations

- 6.22. The proposals seek to make internal alterations to the Grade II* listed building. This includes refurbishment and reconfiguration of the specified areas of the building. 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 2B 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.
- 6.23. The Heritage Statement submitted in support of this application supports this, and states that where internal partitions are being removed and the floorspace is being reconfigured, the negative impact will be mitigated by the benefit of creating improved teaching, learning and administration spaces as well as the completion of Lasdun's original design intent.
- 6.24. 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 for its optimum viable use.
- 6.25. The refurbishment and decoration works have neutral or negligible impact on significance and 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 and has neutral impact on the significance of the building
- 6.26. 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

- 6.27. The external works being proposed are minimal in scope and involve work to external terraces on Levels 6-9, the lobby roof of Level 4 and the roof at Level 10, and the installation of louvres at Level 8.
- 6.28. The proposed louvres and new glazed panels are located to the rear of the building on level 8 of the Wing connected to Core A and therefore will have minimal visual impact. The louvres will match the architectural rhetoric and will be consistent with the louvres installed in Phase 1. Although there will be minor negative impact due a small loss of historic fabric as a result of their installation, this is considered to be outweighed by the considerable public benefits associated with the upgrading of the building; which include providing much needed office, teaching and social space as well as securing the future of UCL in the building which is the optimal viable use for which it was designed. Further benefits are set out in Chapter 7.
- 6.29. The new secondary glazing will have minimal visual impact in external views of the building and will match that installed in Phase 1. As such this will result in a neutral impact on the significance of the building.
- 6.30. The works to the terraces and roofs will improve the water tightness of these areas, futureproofing the building and preventing any damage to the fabric. This will have a neutral impact on significance as the overall change to the appearance of the building will be negligible and the fabric to be replaced of is limited significance itself
- 6.31. The installation of new insulation to the terraces will result in considerable thermal improvements to the building. The installation will result in a minor increase in height of the terrace floor level, however, sufficient detail has been provided to demonstrate that the works can be undertaken with no harm caused to the listed building. The approach is the same as agreed for Phase 1 and has been discussed in detail with the conservation officer.

Summary

- 6.32. The proposals will deliver public and heritage benefits and will have neutral or negligible impact on the significance of the building. Any minor negative impacts will be mitigated by the completion of Lasdun's design intentions and the benefits of the scheme.
- 6.33. 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

- 6.34. 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.
- 6.35. Policy A4 'Noise and Vibration' sets out that Camden will seek to ensure that noise and vibration are controlled and managed.

Applicant's Response

- 6.36. This planning and listed building consent application is accompanied by an acoustic report which demonstrates that the new plant room 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.

Sustainability

- 6.37. At the heart of the NPPF is the presumption in favour of sustainable development.
- 6.38. London Plan Policy 5.2 'Minimising Carbon Dioxide Emissions' seeks to ensure that non-domestic buildings major developments meet a zero carbon target.
- 6.39. 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.
- 6.40. 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.
- 6.41. Local Plan Policy CC2 'Adapting to Climate Change' requires all development to be resilient to climate change. The Council will promote and measure sustainable design and construction by ensuring non-domestic developments achieve a BREEAM rating of 'excellent'. The Policy also encourages expecting non-domestic developments of 500 sqm of floorspace or above to achieve "excellent" in BREEAM assessments and encouraging zero carbon in new development from 2019.
- 6.42. 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

- 6.43. This application is accompanied by a Sustainability Statement.
- 6.44. As part of UCL's Sustainability Agenda, they have the aim of ensuring all buildings are zero net carbon by 2030. These proposals work towards achieving this goal.
- 6.45. 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 2B works will contribute towards providing a more sustainable historic building, and how this has been considered from the outset of the works.
- 6.46. 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.
- 6.47. In Phase 2B, the installation of new secondary glazing as well as the installation of insulation on each of terraces on Levels 6-9 will contribute towards improved thermal / energy performance.
- 6.48. 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.
- 6.49. A BREEAM rating of 'excellent' is being targeted for the entirety of the works being carried out to the IoE and the project is on track to score 75.8% which surpasses the 'excellent' score.
- 6.50. The Phase 2B proposals helps to works towards the 39% reduction in carbon dioxide emissions as set out in the Phase 2 energy strategy.
- 6.51. Such improvements will also contribute to the improvement of user amenity, including insulation from noise as well as thermal, and light and air quality.

- 6.52. Despite the constraints of the Grade II* listed building, Phase 2B proposals will significantly improve energy performance.

7 Benefits of the Proposal

7.1. Overall, the proposals will deliver a significant number of public and heritage benefits that will outweigh the identified 'less than substantial harm' causes by the proposed works. On this basis, the proposals meet the tests set out in the NPPF and local policy.

7.2. 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 originally intended.
- **More efficient use of space** on Levels 5-9 on the Nibs and Wings connected to Core A, 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.
- Refurbishment and decoration works which are **respectful and enhance the significance of the listed building and its architectural interest**.
- The proposals **complete Lasdun's original design intention**.
- Aligns the building with **modern health and safety, and fire safety** standards.
- The proposals **will improve the sustainability of the building**, and contribute towards UCL's vision to be zero carbon by 2030.
- The proposals are sustainable and will achieve a **BREEAM rating of 'excellent'**.
- 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**.
- The **new teaching spaces are vital for UCL in terms of fulfilling the role of a higher education** provided in Camden and will **actively support UCL's important contribution to the expanding knowledge quarter in Camden, and wider economic function of the London CAZ**.
- Increase investment into this importance 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.

8 Conclusion

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

"Refurbishment and reconfiguration of selected areas of the Institute of Education, 20 Bedford Way, comprising: refurbishment works to the Level 1 plantroom; reconfiguration and refurbishment of Levels 5-9 in the nib and wing connected to Core A, and the Lawton Room at Level 6 adjoining Wing A; repairs and installation of insulation to the external terraces connected to these areas; installation of secondary glazing to these areas; creation of a new plant room at Level 8 Wing A and installation of new louvres to serve this plant room; refurbishment and repairs to the lobby roof on level 4 and the roof at Level 10; installation of new external gate at Level 5 of Wing A; and associated works."

- 8.2. The Masterplan for the IoE has been partially implemented with Phase 1 complete and Phase 2A approved. This application is for Phase 2B of the masterplan. The Phase 2B works focus on refurbishment and reconfiguration of selected areas of the floorplate.
- 8.3. 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.
- 8.4. 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.
- 8.5. Despite the restrictions of being a Grade II* listed building, the proposals will significantly improve the energy performance of the building which will help to align it to modern standards and improve the usability of the space for students and staff.
- 8.6. The impact of the proposals will have a neutral or negligible impact on the significance of the building and any minor negative impacts will be mitigated by the completion of Lasdun's design intention; the internal layout of the building was envisioned to change as the needs of the university evolved, so that the building could remain viable in the long term. This is further reiterated in the accompanying Heritage Statement prepared by Alan Baxter.
- 8.7. For these reasons, planning and listed building consent should be granted for these proposals.

9 Appendix

Table of Historic Planning Applications

Application Reference	Description of Development	Approval Date
2019/6410/L	Minor alterations and refurbishment 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.	Approved 02.03.2020
2019/6386/P	Minor alterations and refurbishment works to selected areas, including Cores A, B and C and alterations to the existing plant enclosure on the roof and the installation of a new chiller unit within this enclosure.	Approved 02.03.2020
2019/5146/L	The installation of two pedestal floor boxes and brackets for wall-mounted TV displays, video conferencing hardware, and a sound bar in Committee Room 3 (Room 420) of 20 Bedford Way.	Approved 11.12.2019
2019/3900/L	Internal and external alterations associated with the conversion of existing garage area to office space including removal of mesh cladding and installation of curtain wall, glazing, louvre panels and double door and internal layout changes	Approved 23.10.2019
2019/3624/P	External alterations including removal of existing mesh cladding and installation of curtain wall, glazing, louvre panels and double door set associated with the conversion of existing garage area to create an internal site office to university (Use Class D1).	Approved 23.10.2019
2019/1721/P 2019/1793/L	Removal of no.3 existing and installation of no.7 new lamp posts around rear forecourt of University building (Use Class D1)	Approved 06.09.2019
2019/054/L	The reconfiguration and refurbishment of the Level 1 washrooms.	Approved 02.05.2019
2018/3322/L	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,	Approved 14.11.2018

	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.	
2018/2874/P	Refurbishment of Levels 2, 4 and 5 of Wing A to provide a replacement students bar to lv.4 (Use Class A4) as well as new teaching and study spaces, staff offices and associated facilities (Use Class D1). External alterations incl. to additions/ relocation of external doors to terraces; replacement terrace rooflight; raising level of terraces to allow for added insulation; and to raise height of existing terrace balustrades. Replacement HVAC system involving the removal of existing plant to lv.4 terrace and relocation to new plant room with associated installation of external louvres.	Approved 14.11.2018
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 30.10.2017



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