



Institute of Education, 20 Bedford Way
Planning Statement

December 2021

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1. Introduction

Introduction

- 1.1. On behalf of our Client, University College London ('UCL'), this planning statement has been prepared in support of a full planning and listed building consent application for extension and 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 and minor extension to the main entrance of the Institute of Education, 20 Bedford Way, comprising: a new extended entrance at Bedford Way, a reconfigured entrance at Thornhaugh Mews; insertion of a new platform lift at Level 3 and a platform lift serving Level 3 and 4; refurbishment of the foyers at Levels 1, 3 and 4 including the installation of fixed furniture and security gates; replacement of doors to the IALS building at Levels 4-9; and other 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 Part C of the Phase 2 works. More detail on the Masterplan is set out below.
- 1.3. This planning and listed building consent application focuses on the upgrade of the entrances to the IoE as well as the refurbishment and reconfiguration of the foyer areas at Levels 1, 3 and 4 and entrance areas at Levels 3 and 4.
- 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 F1(a) (higher education) and associated ancillary floorspace and is Grade II* listed. On 1 September 2020, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 came into effect. These regulations amended and simplified the use class system. This application therefore adopts an up to date referencing whereby former Classes D1 is referred to as F1(a).
- 1.6. 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.
- 1.7. 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.
- 1.8. 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.
- 1.9. 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 F1(a) 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.
- 1.10. Consequently, to limit disruption to the existing F1(a) provision and pressure on already encumbered F1(a) floorspace elsewhere on Campus, UCL has taken a phased approach to the implementation of the master planning works at 20 Bedford Way.
- 1.11. Phase 1 of the Masterplan has already been implemented and has been successful. This phase sought to modernise the building, improve accessibility, improve student experience and bring forward more F1(a) floorspace.

- 1.12. 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 allowed the Phase 2B works to come forward.
- 1.13. Phase 2B (ref. 2020/1567/L and 2020/1520/P) of the Masterplan was approved on 15 June 2020 and focused on repairs and insulation to the external terraces and the roof, the creation of a new plant room and the reconfiguration and refurbishment at Levels 5-9 in the nib and wing connected to Core A as well as the Lawton Room at Level 6 adjoining Wing A.
- 1.14. This application is for Phase 2C which focuses on the upgrade of the entrances to the IoE as well as the refurbishment and reconfiguration of the foyer areas at Levels 1, 3 and 4 and entrance areas at Levels 3 and 4.

The Applicant – University College London

- 1.15. UCL is London's leading multidisciplinary university, with over 14,000 staff and 43,000 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 8th in the world (QS World University Rankings 2022).

Application Documents

- 1.16. This application comprises of:
- Application Form, certificates and notices – (prepared by Deloitte, dated 21 December 2021);
 - Site Location Plan – (prepared by Architon LLP, dated December 2020)
 - Design and Access Statement – (prepared by Penoyre & Prasad, dated December 2021);
 - Architectural Drawings (including drawing register, existing, demolition and proposed plans, sections, roof plans and external and internal elevations, details detailed drawings and reflected ceiling plans) – (prepared by Architon LLP dated February 2021 and December 2021);
 - Fire Drawings – (prepared by FISK, dated June 2021);
 - IALS Door Drawings – (prepared by Architon LLP, dated January 2021);
 - M&E Drawings (including Electrical, Mechanical and Public Health drawings) – (prepared by Building Services Consultants, various dates)
 - Planning Statement – (prepared by Deloitte, dated December 2021);
 - Heritage Statement – (prepared by Alan Baxter Associates, dated December 2021);
 - Structural Report (including drawing ref. 20094/GA/001) – (prepared by TAK Structures Ltd, dated 16 December 2021);
 - Schedule of Works – (prepared by Overbury, dated 16 April 2021);
 - Thermal Comfort Report – (prepared by Long and Partners, dated 20 December 2021)
 - Sustainability Report – (prepared by Buro Happold, dated 15 January 2021); and,
 - CIL Form – (prepared by Deloitte, dated 21 December 2021).

Structure

- 1.17. 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 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 the entrances on Bedford Way and Thornhaugh Mews as well as the internal foyer area at Levels 3 and 4, as well as some additional selected areas of the building.

- 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 F1(a) 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 and 2B 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 at Levels 2-4 of the wing adjoining Core A, a new student union bar at Level 2, and new workspace for staff at Levels 2, 4 and 5 in the wing adjoining Core A.
- 2.15. Phase 2A related to enabling works and comprised of upgrade works to services mostly concentrated within the 3 cores of the building.
- 2.16. Phase 2B enabled the creation of new teaching and workspaces for staff and students at Levels 5-9 in the wings and nibs connected to Core A as well as the Lawton Room at Level 6 adjoining Wing A.
- 2.17. This application is for Phase 2C and will deliver new and improved entrances into the building, and reconfigure and refurbish the foyer areas at Level 1, 3 and 4. This proposal aims to reinvigorate the original architectural design by improving the grandeur of the entrance which leads to the main atrium; one of the most architecturally significant parts of the building. The proposals will showcase the building in line with Lasdun's original design intent.

3. The Proposals

Description of Development

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

“Refurbishment and reconfiguration of selected areas and minor extension to the main entrance of the Institute of Education, 20 Bedford Way, comprising: a new extended entrance at Bedford Way, a reconfigured entrance at Thornhaugh Mews; insertion of a new platform lift at Level 3 and a platform lift serving Level 3 and 4; refurbishment of the foyers at Levels 1, 3 and 4 including the installation of fixed furniture and security gates; replacement of the doors to the IALS building at Levels 4-9; and other associated works.”

3.2. These proposals relate to the entrances at Bedford Way and Thornhaugh Mews, the main foyer and entrance areas at Levels 3 and 4, the foyer area at Level 1. Minor works are proposed elsewhere in Phase 2 areas.

Description of Proposals

External Alterations

Bedford Way Entrance

- 3.3. The entrance on Bedford Way is the main entrance into the building. Visitors arriving at this entrance can enter the building via two ways: up an external projecting staircase leading up to Level 4; and, from street level through revolving doors to Level 3. The existing accessible entrance is located to the north of these main entrances via a narrow ramp from the pavement.
- 3.4. Due to the multiple means of entering the building from Bedford Way, none of which have the presence of a ‘main’ entrance, the building has a poor relationship with the public realm and unclear street presence. Consequently, the entrance into this grand listed building is confusing, and underwhelming. This contradicts Lasdun’s original design intent which was to have a grand arrival sequence. It is also currently not considered fully accessible due to the staircase and door types prohibiting access by wheelchair users.
- 3.5. The proposals are seeking to improve accessibility, visibility and security of the entrance. The 1992 addition of the staircase will be removed, and a new entrance pavilion is being proposed which will be constructed between two existing concrete pillars. It will extend beyond the pillars and onto Bedford Way in order to increase the entrance’s visibility and presence. The extension will accommodate a reception and contribute to improving security, and also be fully accessible.
- 3.6. The entrance pavilion will consist of predominantly new glazing in colour and form to match the existing facade. Existing paving will be lifted and re-laid.
- 3.7. Two automatic circular drum doors will be inserted at the entrance of the pavilion. This will allow the entrance to be fully accessible to all users as the doors do not rely on someone having to push them open. There will be an additional door located on the eastern elevation of the entrance pavilion.
- 3.8. Excess signage located on the concrete pillars will be removed and new signage will be installed at a later date (and subject to a separate application).
- 3.9. The proposals have taken inspiration from the entrance pavilion to the Curzon Cinema in the Brunswick Centre, which is considered to be a sympathetically designed entrance to an architecturally similar building, which attracts people to the building.
- 3.10. The drawing extracts and image below present the new entrance.

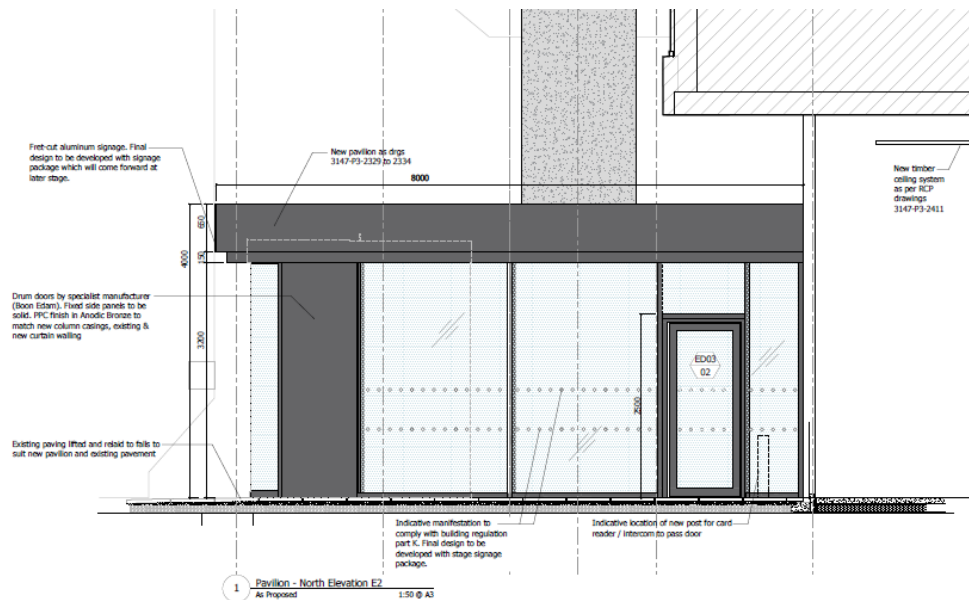


Figure 1: The new entrance pavilion (drawing ref: 3147-P3-2331 P1) (Source: Architon Drawings)

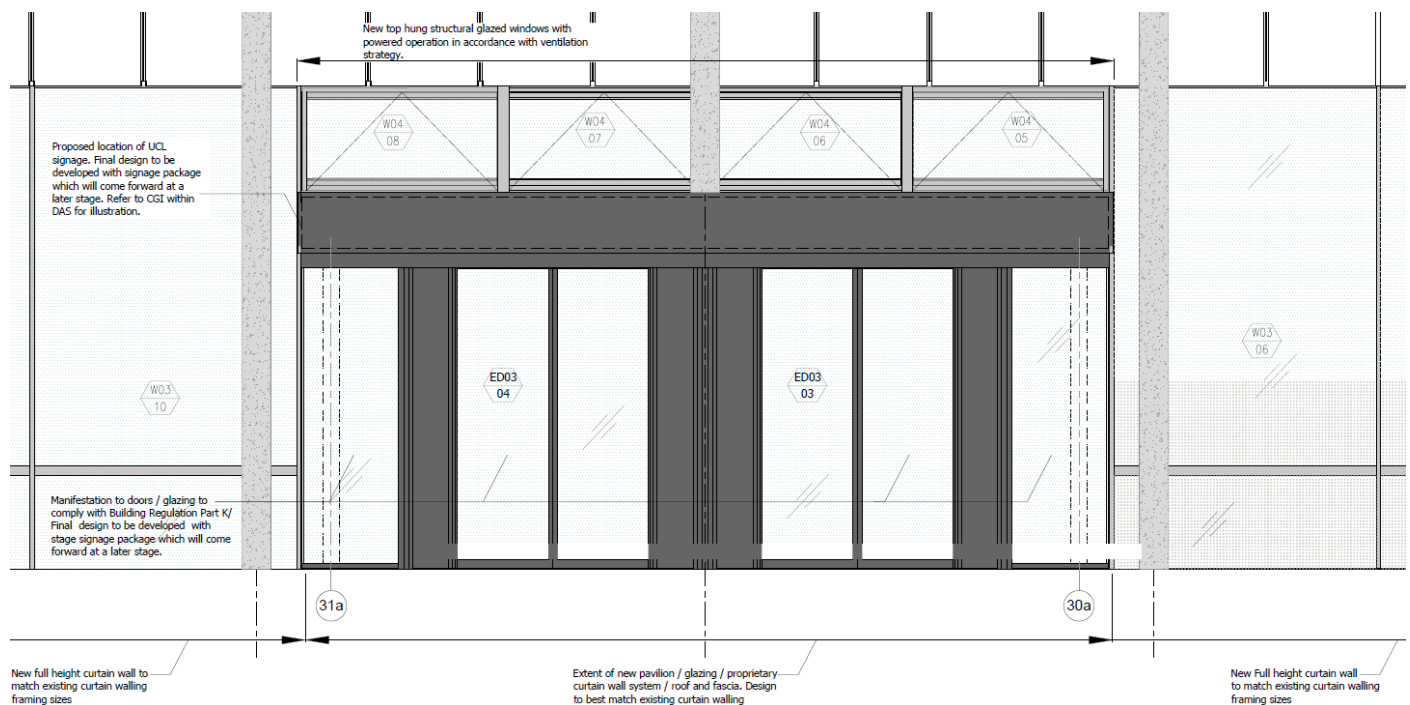


Figure 2: The new entrance pavilion (ref. 3147-P3-2330) (Source: Architon Drawings)



Figure 3: The new entrance pavilion (Source: Design and Access Statement prepared by Penoyre and Prasad)

Thornhaugh Mews Entrance

- 3.11. Thornhaugh Mews acts as the secondary entrance to the IoE. Visitors arriving at this entrance will enter the building at Level 4. The existing entrance is through a revolving door or a pass door. This is not inclusive and causes some users to use the side door. In addition, this entrance creates a bottleneck, as it accommodates high student footfall leading out to Woburn Square and towards the Bloomsbury Campus.
- 3.12. The existing singular revolving door will be replaced by a sliding curved door with two doors either side. This will guarantee a smooth flow of people into and out of the building whilst ensuring the building is fully accessible from this entrance point. The diagrams below present the existing and proposed elevation of the entrance at Thornhaugh Mews.

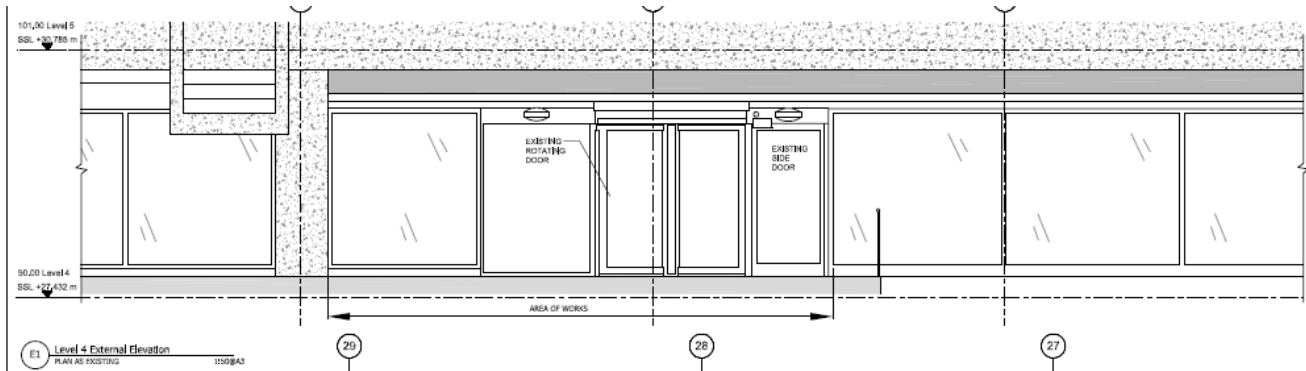


Figure 4: Existing Level 4 Elevation (ref. 3147-P3-2420 P1) (Source: Architon LLP)

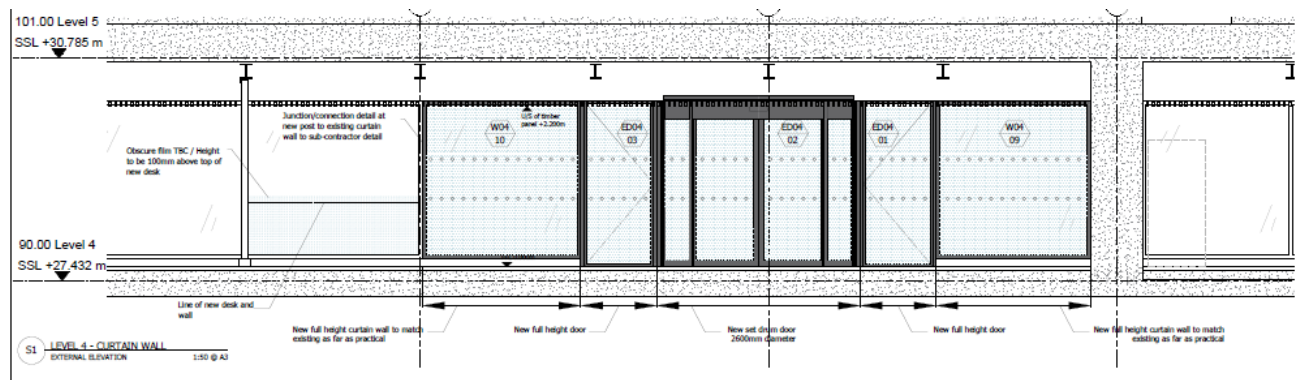


Figure 5: Proposed Level 4 Elevation (ref. 3147-P3-2321 P1) (Source: Architon LLP)

- 3.13. The new doors and frames have been designed to tie in with the anodised bronze and glazing of the elevations.
- 3.14. Internal blinds will be inserted on the Thornhaugh Mews façade in order to provide solar shading for the building.

Internal Alterations

Lifts

- 3.15. The building is currently not fully accessible for all users. This is accentuated by its split level design which means the main atrium and entrance spaces are split over levels 3 and 4. As such, two new lifts are being proposed to ensure that all users are able to easily access and move through all areas of the building.
- 3.16. The first platform lift will be located close to the main entrance onto Bedford Way within the first set of atrium stairs which the user is faced with immediately once entering the building. This will provide users with easy access to the foyer and main circulation corridors at Level 3. The accompanying Design and Access Statement, prepared by Penoyre and Prasad, explains in further detail the justification for the location of the platform lift.
- 3.17. The proposal is for a fully glazed low rise platform lift which will complement the architectural form of the building. The existing balustrades will be reused. The image below indicatively demonstrates what the lift will look like. Materials and colour will tie in with the interior of the building.

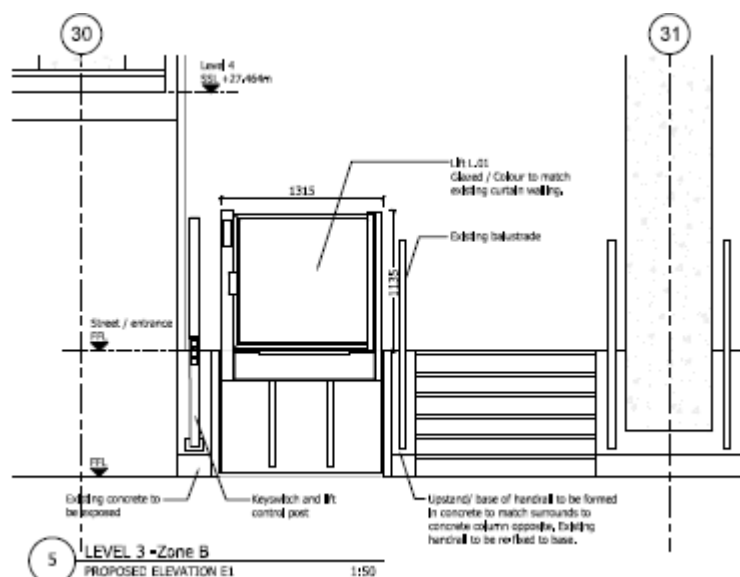


Figure 6: Proposed Lift Detail (ref. 3147-P3-2326 P4) (Source: Architon LLP).

- 3.18. The existing platform lift located at the end of the café on Level 3 will be replaced with a new lift. The drawings below highlights the location of the two new proposed lifts, they are highlighted with red boxes.

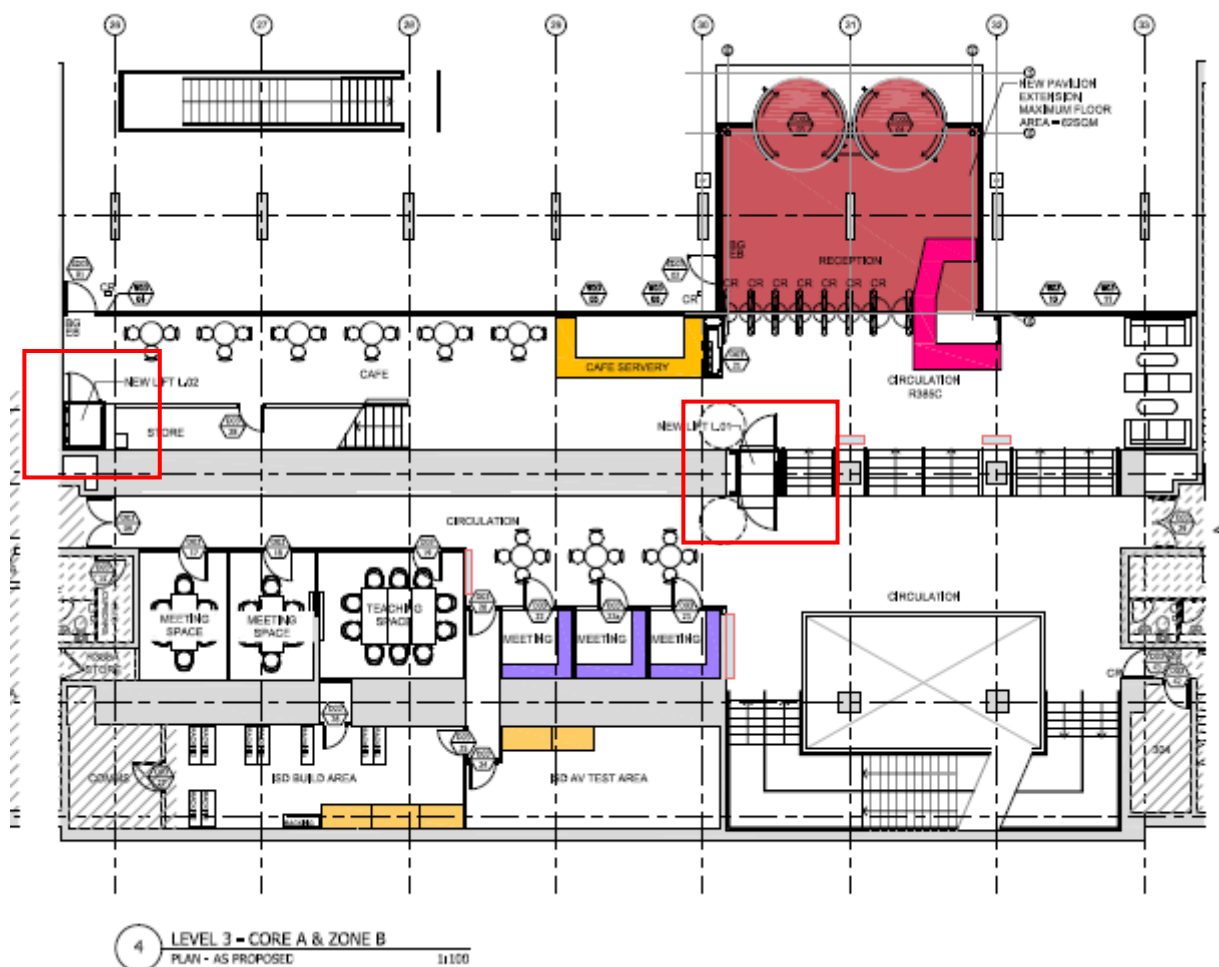


Figure 7: Level 3 & 2 floor plan (ref. 3147-P3-2305 P7) (Source: Architon LLP)

Reconfiguration and Refurbishment of the Foyer at Levels 3 and 4

- 3.19. The existing layout of the foyer at Levels 3 and 4 includes a café servary located on Level 4 in a central location (as highlighted by the red square below), and underused open space at Level 3. At Level 4 there is an open planned foyer area which has a loose furnished seating area. The floorplan below presents the existing layout.

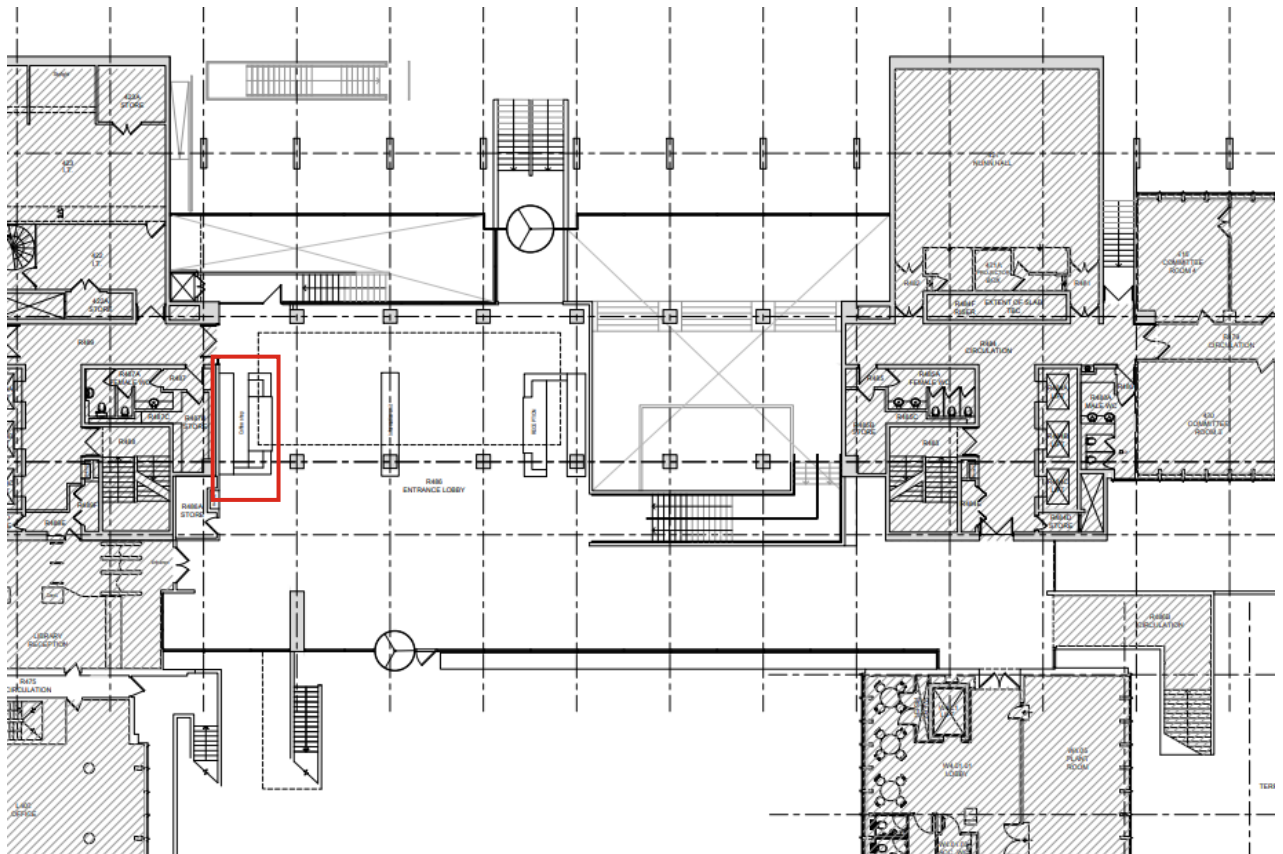


Figure 8: Extract from the Level 4 existing floorplan (drawing ref. 3147-P3-2401 P5) (Source: Architon)

- 3.20. The proposals are seeking to better utilise the important foyer areas where currently users of the building pass through or gather. The refurbished areas will provide shared social and common space to foster collaborative working and research.
- 3.21. New reception desks are being proposed at both the Bedford Way and Thornhaugh Mews entrance. Security gates will also be installed. These additions will define both entrances to users and improve wayfinding. In addition, they will provide additional security.
- 3.22. A new café area is being proposed at Level 3, close to the entrance on Bedford Way. It will be in a prominent position within the building, enlivening the Bedford Way façade and is easily accessible for all users.
- 3.23. The foyer area at Level 3 and 4 is being reconfigured to provide users with an informal area to gather and meet. As part of the reconfiguration, new furniture and desks will be installed (highlighted by the red box on the drawing below) as well as new seating which will be installed in the meeting rooms as well as in the foyer areas at Levels 3 and 4.
- 3.24. The drawings below present the proposed layouts of Level 3 and 4.

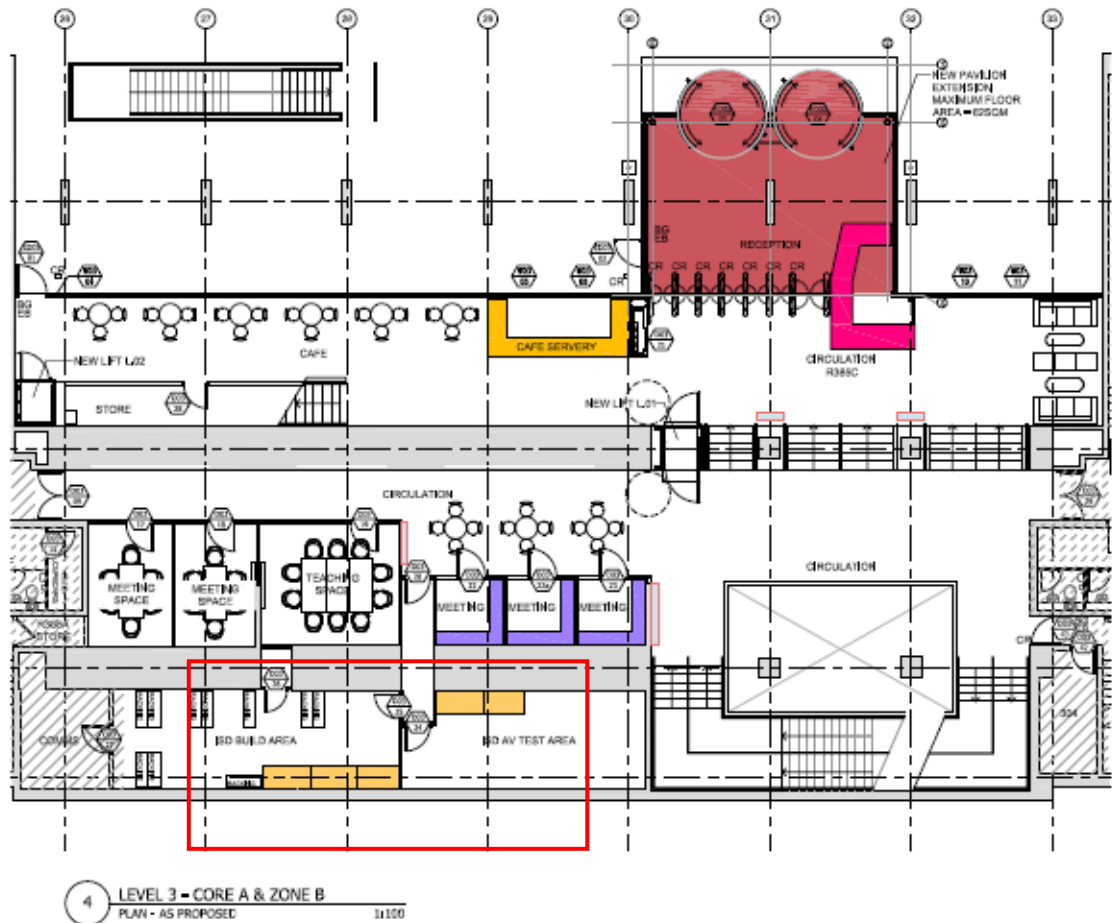


Figure 9: Extract from the Proposed Level 3 floorplan (drawing ref: 3147-P3-2305 P7) (Source: Architon)

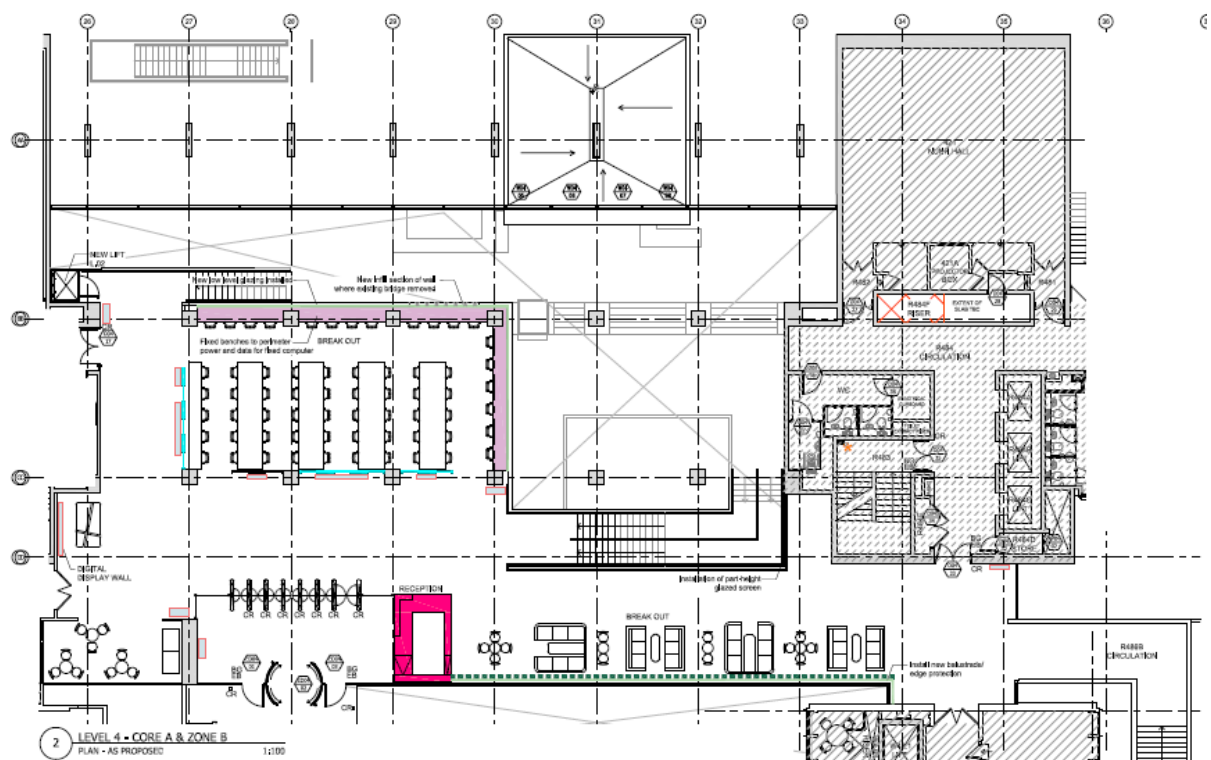


Figure 10: Extract from the Proposed Level 4 floorplan (drawing ref: 3147-P3-2405 P8) (Source: Architon)

original features of the building. The revised proposal looks to utilise existing openings and reduce removal of original fabric.

- 3.29. The existing fire alarm system will be replaced with a zonal fire alarm system in order to improve fire safety within the building. Detection points will be located in various areas around the building. Where an existing fire alarm system is in place, it will be replaced. There will be some areas where it will be installed as new. External beacons will be located on the Level 6 and 10 roofs.
- 3.30. Card access points are proposed on the relevant doors as well as in the lift.
- 3.31. The doors on Level 4-9 that mark the boundary between the IoE and the IALs building are proposed to be replaced. The new doors will match the doors replaced in the previous phases of the Masterplan.
- 3.32. On Level 4, the existing rooflights will be replaced with new operational motorised rooflights. The existing waterproofing will also be replaced.
- 3.33. Overall, the other changes being proposed in other areas of the building will match those implemented in the foyer on Levels 3 and 4 as well as the other Phases of the IoE refurbishment.

4. Pre-application Discussions

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

Principle of a Masterplan Approach to Refurbishment

- 4.2. 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.
- 4.3. 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.
- 4.4. The principle of a phased masterplan approach was accepted.

Phase 2 Pre-Application Meetings

- 4.5. Further pre-application meetings have been held with the London Borough of Camden, Historic England and the Twentieth Century Society.
- 4.6. The pre-application meetings have included a site walk around, in which the key areas of significance were highlighted. The following key elements of design were discussed in detail during the meetings:
- **The main entrance** – Officers expressed support for an improved entrance of sympathetic, high quality design.
 - **The Thornhaugh Mews external façade** – The proposed alterations to the rear were welcomed by officers, including the new doors (sensitively designed to match existing) to improve access.
 - **The Foyer at Levels 3 and 4** – No concerns were raised in relation to the internal changes proposed to the foyer on levels 3 and 4. It was agreed that the changes would help to restore the building back to its original form and enhance the architectural significance. Officers welcomed the vision to restore the grandeur of the foyer at Levels 3 and 4.
 - **Platform lift** – The Conservation Officer requested that all alternative options for providing level access were explored, to minimise impact to the building. It was understood that there needs to be a fine balance with preserving the significance of a listed building as well as providing access to all potential users. As such the design team, having liaised with the Conservation Officer and having examined all possible solutions concluded that the proposed design of the accessible lift is the least intrusive in terms of impact on the building.
- 4.7. Further pre-application meetings have been held virtually to present the detailed elements of the design and the design progression for these. Throughout these meetings, the applicant has demonstrated that officer considerations had been fully addressed during the design development.
- 4.8. Overall, the proposals have undergone a thorough consultation process with LB Camden and key stakeholders. The proposals have the support of Historic England, Twentieth Century Society and LB Camden.

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) (2021) 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.

5.4. The NPPF seeks to conserve and enhance heritage assets. It states, “*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*”

The Development Plan

5.5. 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.

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

- The London Plan (2021);
- Camden Local Plan (2017);
- Camden Policies Map (2019); and,
- Camden Site Allocations Plan (2013).

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

- Bloomsbury Conservation Area Appraisal and Management Strategy (2011); and,
- Camden Planning Guidance: Design (2019), 3: Energy Efficiency and Adaption (2021); Access for all (2019).

Site Allocations

5.8. 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, 2021); 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;
- Accessibility; and,
- Sustainability.

Principles of Proposals and Land Use

6.2. London Plan Policy GG5 'Growing a good economy' seeks to conserve and enhance London's global economic competitiveness.

6.3. London Plan Policy E8 'Sector growth opportunities and clusters' supports London's role as a location for research and development. Collaboration between higher education providers should be encouraged. Whilst policy SD4 'The Central Activities Zone (CAZ) states that *'the CAZ as a centre of excellence and specialist clusters including function of (...) education (...) should be supported and promoted.'*

6.4. 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".

Applicant's Response

6.5. 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 also to maintain UCL's role within the Knowledge Quarter and the Borough of Camden.

6.6. The proposals, forming part of a phased masterplan, are a sustainable response to the recent and increasing pressures on F1(a) floorspace within the wider UCL Bloomsbury Campus, and will seek to optimise existing floorspace with limited impact on the occupants of the building and no impact to surrounding occupiers in the wider area.

6.7. The proposals are for the refurbishment of and extension to an established higher education building in Bloomsbury. The IoE is located within the 'knowledge quarter' in which there is a high density of higher education uses. The proposals will not change the use of the building and will contribute positively to the thriving knowledge quarter.

6.8. There will be a small uplift of floorspace (62 SQM) due to the new entrance area on Bedford Way. This, combined with internal reconfiguration, aims to optimise the Level 3 and 4 foyer areas for students and staff.

6.9. Overall, the Phase 2C works will facilitate an improved user experience within the building, through providing high quality, modern facilities that are befitting of 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 (2021) '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 189-208 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 199 – 208 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 201 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. 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."*
- 6.15. 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.
- 6.16. 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.
- 6.17. 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.
- 6.18. 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.

- 6.19. 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.
- 6.20. The Bloomsbury Conservation Area Appraisal and Management Strategy (2011), Paragraph 5.32 states that the visual characteristics of the Conservation derive from the experience of moving between streets, squares and other spaces, and the contrast between enclosure and open spaces. It is noted that the area is strongly influenced by a formal pattern of streets and spaces but it is not planned to create distinctive formal vistas to architectural set pieces.

Applicant's Response

Internal Alterations

- 6.21. The building was originally designed by Lasdun for F1(a) 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.
- 6.22. 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 as well as the insertion of a platform lift. 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. The reconfiguration of the Phase 2C 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. As part of the internal reconfiguration, it is being proposed to remove non-original fixed furniture whilst the foyer at Levels 3 and 4 will remain open plan. This proposal is in line with the Lasdun's original design intent which sought to have an open plan foyer area at Levels 3 and 4 which can be used flexibly. The Heritage Statement submitted in support of this application confirms that this element of the proposal will have no impact on the architectural significance of the building.
- 6.24. It is being proposed to strip back the plaster which covers the ground columns in the atrium and the concrete soffit to Level 3 will be exposed. In addition, the plaster in the foyer at Level 1 will be stripped back. This will result in no harm to the architectural and historical significance of the building and will restore the building closer to its original form which is in line with Policy D2 'Heritage' of the Camden Local Plan (2017) which seeks to preserve and enhance listed buildings.
- 6.25. The platform lift has been discussed considerably with the Conservation Officer and it had been agreed that there was a need to balance the need for accessibility with maintaining the original fabric and design intent of the building. The proposed materials will be in line with Lasdun's original design intent. The location of the lift has been carefully analysed and offers full accessibility whilst ensuring only minimal original fabric will be removed in comparison to other locations. The Design and Access Statement prepared by Penoyre and Prasad sets out the design development of the platform lift.
- 6.26. The Heritage Statement prepared by Alan Baxters and submitted in support of this application states that where the platform lift is being installed there will be a small loss of original fabric, and harm to significance as a result. However, given the improved access the small degree of harm, less than substantial in heritage terms, will be outweighed by the greater public benefits of improving access to all areas of the building.
- 6.27. The insertion of reception desks and entrance gates will have no impact on the architectural significance of the building. The entrance gates and desks have been designed to be unobtrusive.
- 6.28. The new café area is proposed to be relatively small and the removal of neutral and detracting partitions, ceilings and flooring in this area is a heritage benefit. The relocation of the café is a positive element of the proposal and will improve the building's contribution to the Bloomsbury Conservation Area through enlivening the façade on Bedford Way.
- 6.29. 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

- 6.30. The proposals include improvements to the Thornhaugh Mews entrance, and a minor extension to the Bedford Way entrance.

Bedford Way

- 6.31. The original entrance onto Bedford Way was through a pair of doors, set within the recessed glazing line behind the concrete pillars. This entrance sequence was altered by Lasdun in 1993 to include an external staircase to Bedford Way which allowed users to enter directly on Level 4. This was in recognition of the poor visibility of the original entrance and the difficulty of having an entrance into a split level space. However, the stairs are not inclusive and the entrance does not have a strong street presence. This, coupled with internal alterations over time, means the grand sense of arrival into the building has been lost.
- 6.32. At the heart of this application is the intention to reinstate the grand architectural experience of the entrances whilst providing level access for all.
- 6.33. The existing signage fixed to the exterior of the building which detracts from the integrity of the façade will be removed. This will de-clutter the exterior.
- 6.34. The proposed entrance pavilion will provide a clear and visible entrance from Bedford Way which projects beyond two concrete pillars. The new extension will maintain the architectural expression and rhythm of the building as originally designed by Lasdun. The entrance will create a sense of grandeur as people walk through to the main atrium which is one of the most important spaces, architecturally, within the building.
- 6.35. The new pavilion will be formed in a curtain walling system with a dark anodised aluminium finish to match the existing material palette of the building. This approach ensures that the new pavilion will be in keeping with the original architectural design of the building.
- 6.36. The accompanying Design and Access Statement prepared by Penoyre and Prasad sets out the design development of the entrance pavilion. It includes views which demonstrate that the proposed massing sits comfortably in relation to the projecting concrete.
- 6.37. The Heritage Statement prepared by Alan Baxters states that the proposal to remove the staircase, entrance and associated signage will be an enhancement to the architectural integrity of the building and a great enhancement to the legibility and accessibility of the listed building. This enhancement outweighs the less than substantial harm arising from the loss of a small section of original glazing. The proposals are considered to be an overall enhancement to the building's architectural interest and significance.

Thornhaugh Mews

- 6.38. The existing entrance on Thornhaugh Mews consists of two doors: a revolving door and pass door. The proposals are seeking to replace this with a sliding curved door with two doors either side in order to improve the overall aesthetic of the building and ensure a smooth flow of people into the building.
- 6.39. The external alteration to the Thornhaugh Mews entrance will have a neutral or negligible impact as the overall change to the building will be minor. The insertion of a new sliding curved door will replace a door which is not part of the original fabric and the materials will match the original materials present in the building.

Summary

- 6.40. The proposals will deliver public and heritage benefits and will have mostly no impact on the significance of the building. The less than substantial harm arising from the small loss of the building's original fabric will be outweighed by the public benefits which include enhanced legibility and accessibility. The public benefits are summarised in the next chapter of this statement.
- 6.41. The heritage benefits are identified in the Heritage Statement submitted in support of this application. 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.

Accessibility

- 6.42. Paragraph 130 of the NPPF (2021) states that planning decisions should ensure that development creates a place that is inclusive and accessible and promotes health and well-being with a high standard of amenity for existing and future users.
- 6.43. London Plan Policy GG1 'Building strong and inclusive communities' states that planning and development must:
- "Support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face."*
- 6.44. London Plan Policy D5 'Inclusive Design' seeks to ensure proposals achieve the highest standards of accessible and inclusive design by being *"convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment"*.
- 6.45. The Camden Local Plan Policy C6 'Access for all' seeks to promote fair access and remove barriers that prevent everyone from accessing facilities and opportunities. The Council therefore expects *"all buildings and places to meet the highest practicable standard of accessible and inclusive design so they can be used safely, easily and with dignity by all."*
- 6.46. The Camden Planning Guidance 'Access for all' (March 2019) provides additional guidance on the policies in the Camden Local Plan (2017). It ensures that the inclusive design is promoted and barriers that prevent people from accessing facilities are removed.

Applicant's Response

- 6.47. A key driver in developing this proposal was to ensure that the building was accessible for all users. Currently, the building is not inclusive. For instance, the route for wheelchair users from Bedford Way to the foyer at Levels 3 and 4 is convoluted and unclear.
- 6.48. The following elements of the proposal seek to address the current accessibility issues present in the building:
- New platform lift taking users from Levels 3-4;
 - Removal of the staircase at the Bedford Way entrance;
 - New automatic doors at the Bedford Way and Thornhaugh Mews entrance;
 - New entrance pavilion guides users to the entrance; and,
 - More direct routes round the building.
- 6.49. The addition of a clearer and more pronounced entrance at Bedford Way will help guide all users to the entrance of the building. Whilst the removal of the stairway at the entrance, and creation of an inclusive access, will result in a more accessible building for all. This is in line with UCL's duty to both staff and students under the Equality Act 2010.
- 6.50. Once within the building, care has been taken to ensure the proposals further improve accessibility, particularly given the split level design of the main foyer at Levels 3 and 4. Two platform lifts are proposed to assist people with navigating between the multiple floor levels.
- 6.51. The London Plan (2021) requires applicants to meet the highest level of accessible and inclusive design. The key elements mentioned above seek to ensure that all users can clearly locate and access the building. As such, the proposals are policy compliant.

Sustainability

- 6.52. At the heart of the NPPF is the presumption in favour of sustainable development.
- 6.53. London Plan Policy SI2 'Minimising greenhouse gas emissions' seeks to ensure that development proposals make the fullest contribution to minimising carbon dioxide emissions.
- 6.54. London Plan Policy GG6 'Increasing efficiency and resilience' seeks to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050.

- 6.55. 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.
- 6.56. 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' encouraging zero carbon in new development from 2019.
- 6.57. Camden's Sustainability CPG recognizes 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

- 6.58. 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 2 works will contribute towards providing a more sustainable historic building, and how this has been considered from the outset of the works.
- 6.59. This application is accompanied by a Sustainability Statement and a Thermal Comfort Assessment. The statements set out the interim position on sustainability and energy for Phase 2C and covers the energy strategy, overheating risk analysis, thermal comfort and the BREEAM strategy.
- 6.60. Key measures which have been implemented across the wider masterplan include:
- Improving the thermal performance of the building fabric in line with heritage constraints;
 - Upgrading all major MEP systems and lighting;
 - Retaining connection to the Bloomsbury Heat and Power network'; and,
 - Targeting a BREEAM rating of 'excellent'.
- 6.61. 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.
- 6.62. As part of UCL's Sustainability Agenda, UCL has the aim of ensuring all buildings are zero net carbon by 2030. These proposals work towards achieving this goal. The Phase 2 proposals will help to work towards the 39% reduction in carbon dioxide emissions as set out in the Phase 2 energy strategy.
- 6.63. The sustainable refurbishment of the IoE has been considered carefully in line with advice from the heritage consultant, Alan Baxters, and in line with guidance set out in the Camden Planning Guidance – Sustainability CGP3 and is policy compliant.

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' caused 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:

- The refurbished 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 wider economic function of the London CAZ.
- The **greater use of the F1(a) space** at Levels 3 and 4 will help **fulfil demand for high quality F1(a) spaces which can be used for collaboration and studying** in the Bloomsbury area.
- 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.
- **Increased investment** into this importance heritage asset to **ensure its viability for its original purpose** into the 21st century.
- The new entrance onto Bedford Way **restores the original grand arrival sequence of the building in line with Lasdun's original design intention**.
- Refurbishment and decoration works which are **respectful and enhance the significance** of the listed building and its architectural interest.
- The relocation of the café space **enhances the building's contribution to the Bloomsbury Conservation Area**.
- The internal proposals seek to **restore the building closer to its original form by removing non-original features and decorating the building in line with the original design intent**.
- The proposals will **improve accessibility and legibility** in and around the building. More users will be able to **appreciate and interact with the listed building**.
- The proposals **reduce inequality** by allowing all users to easily access all areas of the building.
- The proposals will **improve security** within the building ensuring that it is safe and secure to use.
- 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 contribute towards the wider IoE masterplan target to **achieve a BREEAM rating of 'excellent'**.

8. Conclusion

- 8.1. This planning and listed building consent application seeks to deliver the most vital part of the phased development at the IoE. The improved entrance on Bedford Way will act as the focal point for the building and reinstate the grandeur of the building. It will be enjoyed by all including staff, students and members of the public.
- 8.2. This planning statement has been prepared in support of a full planning and listed building consent application for the following proposed works at the IoE:
- “Refurbishment and reconfiguration of selected areas and minor extension to the main entrance of the Institute of Education, 20 Bedford Way, comprising: a new extended entrance at Bedford Way, a reconfigured entrance at Thornhaugh Mews; insertion of a new platform lift at Level 3 and a platform lift serving Level 3 and 4; refurbishment of the foyers at Levels 1, 3 and 4 including the installation of fixed furniture and security gates; replacement of the doors to the IALS building at Levels 4-9; and other associated works.”*
- 8.3. The Masterplan for the IoE has been partially implemented with Phase 1 complete and Phase 2A and 2B approved. This application is for Phase 2C of the masterplan. The Phase 2C works focus on refurbishment and reconfiguration of the foyer at Levels 1, 3 and 4 as well as the entrances onto Bedford Way and Thornhaugh Mews.
- 8.4. 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 F1(a) floorspace in Camden and to improve the experience of staff and students who occupy the building.
- 8.5. 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.
- 8.6. 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.
- 8.7. Accessibility has been a key driver for Phase 2C and these proposals seek to ensure that all users are able to access the building easily and equally.
- 8.8. The impact of the proposals will have mostly no 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. The proposals offer significant public benefits which outweigh the less-than-substantial harm caused by the proposals. This is further reiterated in the accompanying Heritage Statement prepared by Alan Baxter.
- 8.9. 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, new louvres to external facade; new doors to access external terraces at Levels 4 and 5; the	Approved 14.11.2018

	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
2020/1567/L	Refurbishment and reconfiguration of selected areas of the Institute of Education comprising: repairs and installation of insulation to the external terraces; 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.	Approved 15.06.2020
2020/1520/P	Refurbishment and reconfiguration of selected areas of the Institute of Education comprising: repairs and installation of insulation to the external terraces; 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.	Approved 15.06.2020
2021/5006/P 2021/5115/L	Installation of one condenser unit at Level 3 and two condenser units at Level 2 on the service road of the Institute of Education and associated works	Approved 30.11.2021



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