



Institute of Education, 20 Bedford Way

Phase 2 – Level 5

Planning Statement

January 2023

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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 listed building consent application for reconfiguration and refurbishment works at the Institute of Education ('IoE'), 20 Bedford Way, WC1H 0AL. The application is seeking listed building consent for:

"Refurbishment and reconfiguration of Level 5 of Zone C of the Institute of Education, 20 Bedford Way comprising: the removal and replacement of existing partitions to create new workspaces; works to ceilings; installation of new lighting; installation of secondary glazing, new flooring and doors; and other associated works."
- 1.2. The proposals form part of the IoE Masterplan which UCL has developed since acquiring the building from the University of London ('UoL'). More detail on the Masterplan is set out below.
- 1.3. This listed building consent application focuses on the refurbishment and reconfiguration of Level 5 in Zone C of the IoE.
- 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.
- 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. Phase 2C (ref. 2021/6235/P and 2021/6242/L) of the Masterplan was approved on 2 March 2022 and focuses on upgrading 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.
- 1.15. Phase 2D has come forward in 2 parts. First, Level 5 (ref. 2022/1037/L) of the Masterplan was submitted on 14 March 2022 and focuses on the refurbishment Level 5 of Zone C. The second part was for the refurbishment and reconfiguration of Level 9 in Zone C of the IoE (ref. 2022/1037/L) and was approved on 30 May 2022.
- 1.16. This application is for a revised scheme of refurbishment and reconfiguration of Level 5 in Zone C of the IoE. This will involve alterations to the proposed layout of Level 5. Level 9 remains unaffected.

The Applicant – University College London

- 1.17. UCL is London's leading multidisciplinary university, with over 13,000 staff and 43,800 students. UCL provides excellence and leadership in teaching and research and was ranked eighth in the QS World University Rankings 2022.

Application Documents

- 1.18. This application comprises of:
 - Application Form, certificates and notices – (prepared by Deloitte, dated 20 January 2023);
 - Site Location Plan – prepared by Architon LLP – (prepared by Architon LLP, dated March 2022);
 - Design and Access Statement – (prepared by Penoyre & Prasad, dated January 2023);
 - Architectural Drawings (including existing, demolition and proposed plans, sections, roof plans, internal elevations, architectural detailed drawings and reflected ceiling plans) – (prepared by Architon LLP dated November 2022);
 - Planning Statement – (prepared by Deloitte, dated January 2023);
 - Covering Letter – (prepared by Deloitte, dated 20 January 2023);
 - Heritage Statement – (prepared by Alan Baxter Associates, dated November 2022);
 - Structural Report – (prepared by TAK Structures Ltd, dated 14 December 2022); and,
 - Schedule of Works – (prepared by Overbury, dated January 2023).

Structure

- 1.19. 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 listed building consent application relates to 20 Bedford Way only, and specifically Level 5 of Zone C.
- 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 sub-phases of Phase 2 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. Phase 2C proposed upgrades to the entrances on Bedford Way and Thornhaugh Mews as well as the reconfiguration and refurbishment of the foyer areas at Level 1, 2 and 4.
- 2.18. Phase 2D comprises 2 parts. The first, Level 5 of zone C, aims to restore the floor closer to Lasdun's original design intent whilst providing floorspace that meets the modern standards and expectations for staff and students.
- 2.19. The second part of Phase 2D was for Level 9 of Zone C. This proposal also looks to restore the floor closer to Lasdun's original design intent whilst providing floorspace that meets the modern standards and expectations for staff and students as well as provide thermal upgrades.
- 2.20. Since the approval of Phase 2D, UCL has decided to alter the layout proposed at Level 5. The proposed refurbishment works are otherwise very similar to that originally approved, with methodologies and approaches to secondary glazing, lighting, ceiling treatments and doors unchanged.

3. The Proposals

Description of Development

3.1. This application is seeking listed building consent for:

“Refurbishment and reconfiguration of Level 5 of Zone C of the Institute of Education, 20 Bedford Way comprising: the removal and replacement of existing partitions to create new workspaces; works to ceilings; installation of new lighting; installation of secondary glazing, new flooring and doors; and other associated works.”

3.2. These proposals relate to Level 5 of Zone C only.

Description of Proposals

Level 5

- 3.3. Level 5 of Core C will be stripped out; 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.
- 3.4. New partitions will be installed to create a mixture of cellular offices, open plan office space and meeting rooms. A kitchenette/tea point and a WC is also proposed.
- 3.5. It is proposed that the existing corridor that connects Core B and C through the floorplate will remain with the use of a continuous acoustic raft with new lighting along the ceiling to define the circulation line within the open-plan layout. This is following the successful principle established in Phase 1, Level 5 Wing Works.
- 3.6. Figure 1 and 2 show the existing and proposed layout.

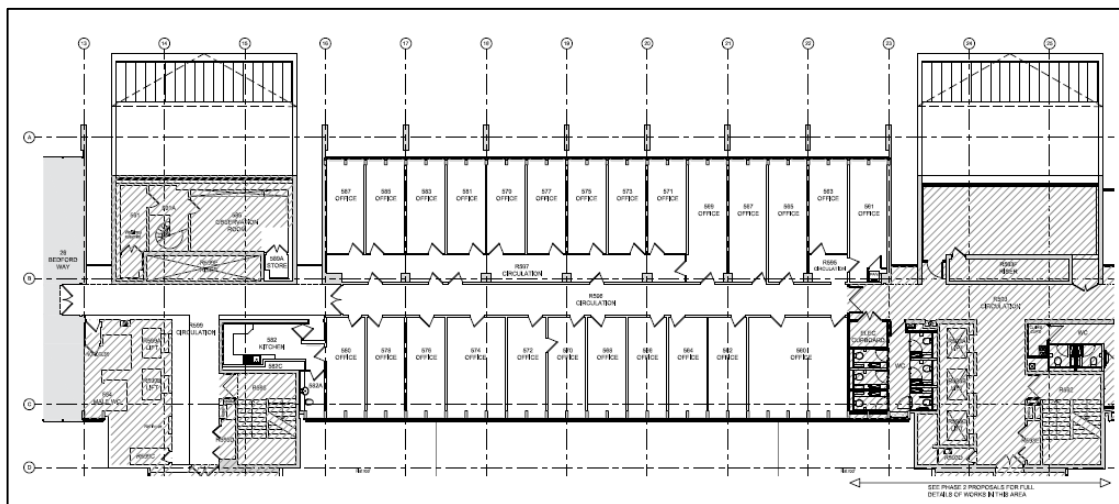


Figure 1 Existing Floor Plan (Source: Architon LLP, drawing ref. 3146-WS5-0501 P2)

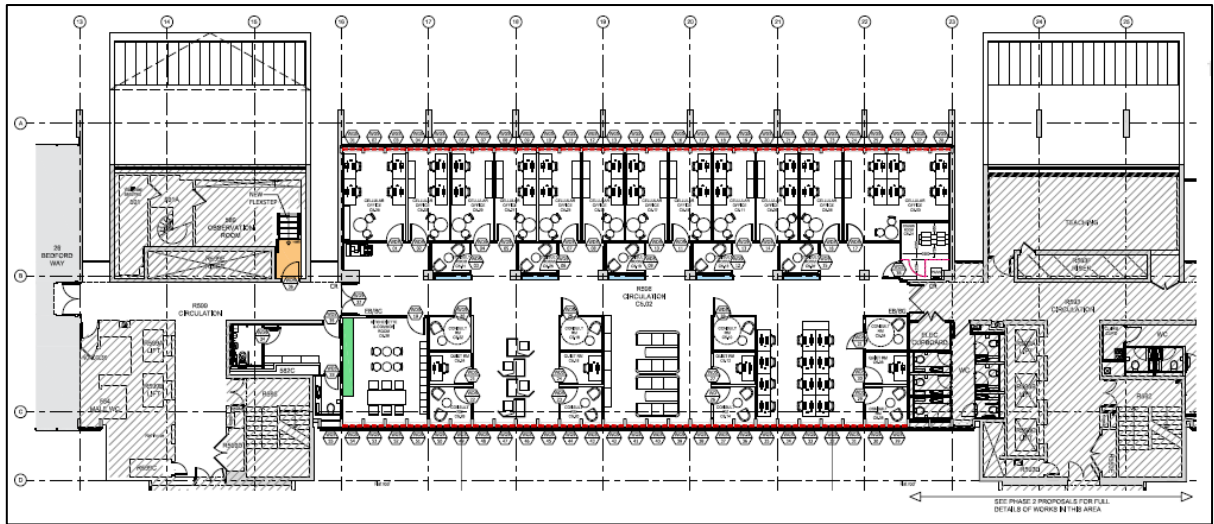


Figure 2 Proposed Floor Plan (Source: Architon LLP, drawing ref. 3147-WS5-0505 P3)

- 3.7. The ceiling in the main corridor will be carefully removed and will be replaced with an exposed soffit with rafts. This will also be included in the cellular offices.
- 3.8. New doors to the workspace areas are proposed. They will be faced with graphite colour laminate and have oak lippings. The door frames will be oak with finishings being stainless steel. Vision panels and ironmongery to the will be installed to suit the door type and application. Figure 3 show the proposed door types.

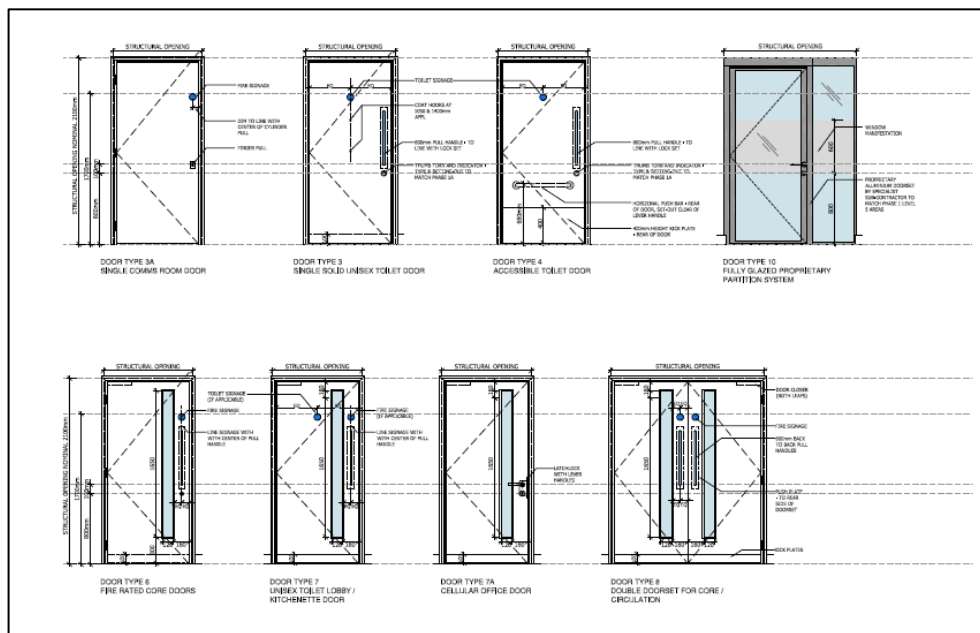


Figure 3 Proposed Door Types (Source: Architon LLP, drawing ref. 3147-WS2-0572 P3)

- 3.9. All finishes including the doors, carpets and blinds will mirror the standard implemented under the Phase 1 and 2 works.
- 3.10. Secondary glazing will be installed on this level. Aluminium framed sash windows, blinds and a laminate-faced low level boxing with new radiators will be installed in front of existing external glazing This will be in line with the glazing which has been installed under the Phase 1 and 2 works.
- 3.11. Thermal upgrades are proposed to the roof and portions of the external wall. The existing paving tiles and ballast will be carefully removed, kept for reinstatement and new waterproofing and insulation will be installed.

- 3.12. There are no external changes included as part of the proposals, and therefore planning permission is not required. This application seeks listed building consent only.

4. Pre-application Discussions

- 4.1. The wider Masterplan and vision has been subject to formal and informal pre-application discussions with the London Borough of Camden, Historic England and the Twentieth Century Society.
- 4.2. Due to the minor and wholly internal nature of this phase of works, it was only considered necessary to consult with the London Borough of Camden Conservation Area.

Principle of a Masterplan Approach to Refurbishment

- 4.3. 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.
- 4.4. 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.
- 4.5. The principle of a phased masterplan approach was accepted.
- 4.6. Initial engagement and meetings were held with the London Borough of Camden, Historic England and the 20th Century Society. Subsequently, the Bloomsbury Conservation Area Advisory Committee has also been consulted and was supportive of the proposals.

Pre-Application Meeting

- 4.7. A pre-application meeting was held with the London Borough of Camden on 9 February 2022 to discuss the Phase 2D proposals in addition to other proposals which were due to come forward.
- 4.8. At this meeting, the proposals were discussed in detail with the Conservation Officer. The design intent and finishes were agreed, with recognition that the finishes in this application would continue the design intent of Phase 1, which has been successful.
- 4.9. Since UCL's decision to alter the Level 5 layout, informal discussions have been held with the Conservation Officer at Camden. It has been confirmed via email to formalise the alterations to the layout at Level 5 via a stand alone listed building consent application.

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 Plan 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).

5.8. The London Borough of Camden has conducted initial engagement on their Draft Local Plan. This consultation sought to identify key issues for the Plan moving forward. Given the early stage in the production of the new Local Plan, the consultation carries limited weight in the decision-making process.

Site Allocations

5.9. 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; 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 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. Overall, these 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

- 6.9. 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.
- 6.10. 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."

6.11. 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.

6.12. 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.

6.13. 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."

6.14. 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.

6.15. 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 assets 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.

6.16. 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.

6.17. 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.

6.18. 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.

6.19. 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 not planned to create distinctive formal vistas to architectural set pieces.

Applicant's Response

- 6.20. 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.
- 6.21. The proposals seek to make internal alterations to the Grade II* listed building. This includes refurbishment and reconfiguration of Level 5, Zone C of the building. Similar 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 Level 5 to suit the evolving needs of the higher education occupier is in the spirit of the original design intent to create an adaptable building.
- 6.22. The refurbishment of surfaces will be an enhancement to the building as it will better reveal the fair-faced concrete where it had been previously overpainted.
- 6.23. The removal of the ceiling, which is to be replaced with exposed concrete soffit and acoustic rafts, will have a neutral impact on the building.
- 6.24. The installation of secondary glazing results in environmental benefits due to the increased thermal comfort for occupiers results in a public benefit. The visual changes which result from the installation of secondary glazing will have a negligible heritage benefit in light of them increasing the architectural uniformity of the building as seen externally. As such, the sustainability benefit and modest heritage benefit outweigh the small degree of less than substantial harm. The installation of secondary glazing is only considered to cause a small degree of less than substantial harm due to the precautionary principle applied in light of the uncertainty around whether the existing glazing system is original or not.
- 6.25. As set out in the Heritage Statement prepared by Alan Baxters, it is considered that the vast majority of works have no or neutral impact to the historical interest of the building. The scheme offers substantial public benefits, as set out in Section 7 of this Planning Statement, in terms of supporting the long-term use of the building which outweigh the less-than-substantial harm which is generated from the installation of secondary glazing.
- 6.26. Overall, the 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.

Sustainability

- 6.27. At the heart of the NPPF is the presumption in favour of sustainable development.
- 6.28. London Plan Policy SI2 'Minimising greenhouse gas emissions' seeks to ensure that development proposals make the fullest contribution to minimising carbon dioxide emissions.
- 6.29. 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.
- 6.30. 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.
- 6.31. 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.
- 6.32. 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

- 6.33. 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 these works will contribute towards providing a more sustainable historic building, and how this has been considered from the outset of the works.

- 6.34. This application will be accompanied by a Sustainability Statement prepared by Buro Happold.
- 6.35. 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'.
- 6.36. A BREEAM rating of 'excellent' is being targeted for the entirety of the works being carried out to the IoE under a single assessment and the project is on track to score 75.8% which surpasses the 'excellent' score, with design and construction stage evidence collated for each phase.
- 6.37. 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.
- 6.38. 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 Level 5 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.
- Refurbishment and decoration works which are **respectful and enhance the significance** of the listed building and its architectural interest.
- 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 have **no impact on the external appearance** of the building, and will have **no impact on the character and appearance of the conservation area**.
- 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 statement has been prepared in support of a listed building consent application for the following refurbishment works at the IoE:

“Refurbishment and reconfiguration of Level 5 of Zone C of the Institute of Education, 20 Bedford Way comprising: the removal and replacement of existing partitions to create new workspaces; works to ceilings; installation of new lighting; installation of secondary glazing, new flooring and doors; and other associated works.”

- 8.2. The Masterplan for the IoE has been partially implemented with Phase 1 complete and Phase 2A, 2B and 2C approved. This application relates to the works proposed on Level 5.
- 8.3. This application will continue to implement the design intent and approved finishes as installed in the Phase 1 and 2 areas. This demonstrates a continued and committed approach by UCL to investing in the listed building to deliver high quality F1(a) 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. It is considered that the vast majority of works have no or neutral impact to the historical interest of the building. The scheme offers substantial public benefits in terms of supporting the long-term use of the building which outweigh the less-than-substantial harm which is generated from the installation of secondary glazing. This is further reiterated in the accompanying Heritage Statement prepared by Alan Baxter.
- 8.7. For these reasons, 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 replacement of a roof light at Level 4; and the insulation of the terrace at Level 4 and 5.	Approved 14.11.2018
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
2021/6235/P 2021/6242/L	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.	Approved 02.03.2022
2022/1037/L	Refurbishment and reconfiguration of Level 5 of Zone C of the Institute of Education, 20 Bedford Way comprising: the removal and replacement of existing partitions to create new workspaces; works to ceilings; the installation of secondary glazing; new flooring and doors; and other associated works.	Approved 24.03.2022
2022/1846/L	Refurbishment and reconfiguration of Level 9 of Zone C of the Institute of Education, 20 Bedford Way comprising: the removal and replacement of existing partitions to create new workspaces; works to ceilings; the installation of secondary glazing; new flooring and doors; thermal upgrades to the roof and portions of the external wall at Level 9; and other associated works.	Approved 10.05.2022
2022/3263/L	Proposed internal works to third floor, involving the removal and the installation of replacement lighting and associated controls, fixtures and fittings.	Approved 02.08.2022



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