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FAO: Laura Dorbeck

14 April 2023

**Our ref:** LEO/LHA/SOTH/U0022023

**Your ref:** PP-11897370

Dear Sir/Madam,

**UCL Institute of Health Informatics, 222 Euston Road, London, NW1 2DA**  
**Town and Country Planning Act 1990 (as amended)**  
**Application for Full Planning Permission**

We write on behalf of our client, University College London ('UCL') (the 'Applicant'), to submit an application for planning permission in respect of external works at University College London Institute of Health Informatics (IHI), 222 Euston Road, London, NW1 2DA (the 'Site').

Planning permission is sought for the following:

**"Installation of six new condenser units and associated works on the roof of the building, following the removal of one condenser unit."**

#### **Site and Surroundings**

University College London (UCL) Institute of Health Informatics (IHI) fronts onto the northern side of Euston Road, and to the rear of the property is Stephenson Way. The Site is currently used for educational purposes by UCL.

The building is not listed, nor is it located within a Conservation Area, although it is within close proximity to Bloomsbury Conservation Area. The Site is located within a Protected Vista: Greenwich Park Wolfe statue to St Paul's Cathedral and it is also falls within the Euston Area Plan.

The surrounding area consists of a mixture of uses. The building to the west of the site is a hotel and restaurant, and the building attached to the east of the site appears to have retail on the ground floor and office above ground. To the south, beyond Euston Road, is Wellcome Trust and Euston Square Underground Station.

The Site has a Public Transport Accessibility Level of (PTAL) of 6b (excellent). Russell Square and Euston underground, overground and railway stations are also within a short walking distance. There are also a number of bus routes serving the area.

### Relevant Planning History

From a review of the Council's online planning register, we have provided a summary of the relevant planning applications relating to the site below.

On 03 December 2013, a planning application (ref. 2013/5523/P) was approved for the **"Change of use of lower ground to fourth floor from offices (Class B1) to dual use education (Class D1) and office (Class B1) for a temporary period of 10 years."**

On 19 November 2013, a planning application (ref. 2013/6029/P) was approved for the **"Installation of ventilation duct and plant equipment in the rear yard of office building (Class B1)."**

A planning application (ref. PS9905103) was submitted on 13 January 2000 for the **"Outline application for mixed use development for business use (6500 square metres) and 12 residential flats and associated parking (36 spaces). (Plans submitted)"**. This application was subsequently withdrawn.

On 20 May 1999, a planning application (ref. PS9904161) was approved for **"Installation of four air handling units at roof level, as shown on drawing numbers P/02, 2386A/M/307 and /308."**

On 06 July 1993, a planning application (ref. 9200646) was approved for **"In Outline: The redevelopment of the site by the erection of a building consisting of 6 500 square metres of office accommodation and 2 100 square metres of residential flats as shown on 74-110 (site plan) and 74/115A 116A & 117B (illustrative drawings) revised by letters dated 2 February 1993 and 4 June 1993."**

On 07 January 1990, a planning application (ref. 9000385) was approved for the **"Outline permission for erection of a basement ground and six storey building to be used for purposes defined by Class B1 of the Town and Country Planning (Use Classes) Order 1987 as shown on drawing nos. 74-100 to 107."**

In the 1980's, a planning application (ref. CTP/M12/9/B/36820) was approved for **"Refurbishment of the existing office building at 222 Euston Road, NW1, involving alteration to part of the front elevation and the erection of a rear toilet extension."**

Similarly, in the 1980's, a planning application (ref. CTP/M12/9/B/35350) was approved for the **"Use the existing building at 222 Euston Road, NW1 as offices."**

### Proposals

Planning permission is sought for the installation of six new condenser units on the roof of the building which is in relation to the internal refurbishment works proposed on the third floor of the building.

The rooms on this floor of the building currently benefit from DX heating and cooling, however the system, due to its age, is now end of life, and it is proposed to replace the existing system with new more efficient units. The new system will use R32 as a refrigerant as it has a low GWP and higher efficiency than the existing systems.

It is proposed to install three new units in the south west corner of the building, measuring approximately 0.9m wide x 1.3m high x 0.3m. All of the units are split type air conditioners (Mitsubishi models). Specification for the proposed unit models accompanies this submission. Furthermore, it is proposed to install three new units in the north east corner of the roof which would each measure approximately 0.9m

wide x 0.9m high x 0.3m deep. All of the units are split type heat pump air conditioners (Mitsubishi models). Specification for the proposed unit models accompanies this submission.

It is proposed to remove the current units which serve the floor and would be redundant as a result of the new units to be installed. The proposals include the removal of one unit in the south west corner on the roof of the building which was granted under planning permission ref. PS9904161 and install three new units in its place. At this stage, it is not possible to trace the existing refrigerant pipework that runs from the internal units to the external units on the roof, it is therefore not known how many of the existing condenser units on the roof serve the third floor of the building, other than the unit shown on the roof plan. Tracing of the pipework will be done when the contract starts, and the contractor will then finalise the detailed M&E design. Any end of life and redundant units which are no longer required to serve the floor will be removed when the new units are installed.

In respect of the number of units proposed, it is understood that installing several smaller units rather than a larger unit(s) is partly due to the use of R32 which can be flammable in certain concentrations, which would be affected by room size and refrigerant charge, should there be a leak. To avoid the need to install costly refrigerant leak detections systems, a number of smaller units have been proposed each with a small refrigerant charge negating the need for leak detection in the occupied spaces. Smaller systems are therefore more appropriate for the layout of the space and more cost effective for the scale of this refurbishment.

The proposals are set out in more detail within the submitted drawings, prepared by Kendall Kingscott.

### **Planning Policy Context**

Section 38(6) of the Planning & Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the Development Plan unless material considerations indicated otherwise.

The London Borough of Camden's Local Development Framework comprises The London Plan (2021), and the Camden Local Plan (2017).

Whilst not forming part of the Statutory Development Plan, the following documents remain important material considerations.

- National Planning Policy Framework (NPPF) (2021);
- National Planning Practice Guidance (NPPG) (as amended); and
- London Borough of Camden's Supplementary Planning Documents.

As the proposals affect a building near to a Conservation Area, consideration has been given to Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

### **Planning Assessment**

#### Design

Local Plan Policy D1 seeks to ensure development respects local context and character, preserves or enhances the historic environment and heritage assets, is of sustainable and durable construction and is adaptable to different activities and land uses and comprises details and materials that are of high quality and complement the local character.

Local Plan Policy D2 seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings.

Paragraph 7.13 of the Local Plan states that building services equipment, such as air cooling, heating, ventilation, and extraction systems, lift and mechanical equipment, as well as fire escapes, ancillary plant and ducting should be contained within the envelope of a building or be located in a visually inconspicuous position.

The proposed six units would be located on the roof of the building and would not be out keeping in their context, noting the existing plant on the roof.

With regard to the three units proposed in the south-west corner of the roof of the building, these units would replace an existing piece of plant and while the quantity of plant would increase, the cumulative scale and impact would be less, with the proposed units sitting lower in height and more discrete in overall massing. The units would be read alongside the existing units and whilst the existing units are visible from the street, only partial views would be gained of the proposed units, due to their scale and reduced height, as well as the set back positioning from the surrounding roof parapet. The impact of the proposed works would therefore be limited on character and appearance of the building and streetscene, and will maintain the character and appearance of the nearby Bloomsbury Conservation Area.

In respect of the three units proposed in the north-east corner of the roof of the building, these new units would be located next to an existing piece of plant in this corner. The proposed units would sit lower than the existing plant on the roof and by virtue of their scale and set back, would not be easily read from the street. The impact of the proposed works would therefore be limited on character and appearance of the building and streetscene, and will maintain the character and appearance of the nearby Bloomsbury Conservation Area.

Furthermore, following the tracing of pipework at a later stage, any current units which are found to serve the space and are now redundant due to the new plant, will be removed, reducing any unnecessary clutter on the roof of the building.

The impact of the proposed works will be limited as the proposals have been designed to ensure the external appearance of the building is altered as minimal as possible with all changes occurring on the roof, with minimal visibility from street-level. Therefore, the proposals would not result in adverse harm to the character and appearance of the building and surrounding area and would comply with Local Plan Policies D1 and D2.

### Amenity

Policy A1 of Camden's Local Plan sets out that the Council will seek to ensure that the quality of life occupiers and neighbours are protected from the impact of development. The relevant factors considered include noise and vibration levels, and odour, fumes, and dust.

Policy A4 of Camden's Local Plan sets out that the Council will seek to ensure that noise and vibration is controlled and managed. The Council state that permission will only be granted for noise generating development, including any plant and machinery, where it can be operated without causing harm to amenity.

A supporting Noise Impact Assessment, prepared by Environmental Equipment Corporation Ltd, has been submitted which assesses the potential noise impact of the proposed plant at the IHI on the closest existing residential receptors. The noise assessment has been conducted in accordance with the policies and requirements of Camden Borough Council (LBC) and sets plant noise limits in accordance with LBC policies and predicts noise impacts at the worst affected noise sensitive receptors.

Plant noise limits have been set based on the methodology contained in BS4142, the results of a background noise survey and the requirements of Camden Council, to control the noise from the

proposed plant items. The noise limit has been set 10 dB below the lowest measured background noise level. Predictions have shown that the noise criterion is met at all assessment locations during all periods of the plant items proposed operation.

The Noise Impact Assessment concludes that noise does not pose a material constraint to the operation of the condenser units. The predicted noise levels would be below the level at which no effects are observed to occur, the 'No Observed Effect Level' (NOEL). As such, the proposals therefore comply with Policy A1 and A4 of Camden's Local Plan.

### Overheating

Policy CC2 of Camden's Local Plan sets out that the Council will seek to ensure that development is resilient to climate change. The Council states that all development should adopt appropriate climate change adaptation measures such as measures to reduce the impact of overheating, including application of the cooling hierarchy, as set out in Policy CC2(d). Furthermore, the Energy Efficiency and Adaptation CCG (2021) states that 'Active cooling will only be permitted where its need is demonstrated and steps in the cooling hierarchy are followed.'

The proposals involve a like for like in respect of cooling as no additional cooling will be introduced as part of these proposals but instead, a new system with improved efficiency of operation and to better cater for reconfiguration of rooms is proposed. The new system will use R32 as a refrigerant as it has a low GWP and higher efficiency than the existing systems.

As the proposal involves the upgrade of an existing DX comfort cooling system with more efficient systems, an Overheating Assessment has been prepared by Kendall Kingscott and submitted in support of this application for the Council's consideration.

Whilst consideration has been given to the cooling hierarchy in the development of the proposals, as set out in the Overheating Assessment, it is considered that as a result of design investigations, active cooling would be required to replace the current system. The proposals are in relation to the refurbishment works to the third floor of the building to create more agile working spaces, meeting rooms and office space. Each of the rooms have been tested and the results indicate a non-complaint model with excessive overheating. The modelled spaces all require comfort cooling to ensure suitable environmental conditions.

The new plant will be more adept at providing active cooling to the building, with improved efficiency of operation and will replace the existing cooling within this part of the building and provide for the refurbished areas, rather than providing additional cooling. The proposals are considered to comply with Policy CC2 of Camden's Local Plan.

### Enhancing Community Facilities

Local Plan Policy C2 states that Camden will support the investment plans of educational, health, scientific and research bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK.

The installation of the new more efficient equipment will assist in providing more fit-for-purpose teaching spaces which meet the current requirements of students and staff of the University. The proposed works will enhance the existing educational use, the proposal therefore complies with Local Plan Policy C2.

### **Summary**

In conclusion, the proposed development complies with relevant policies of the Camden Local Plan, namely Policies D1, D2, A1 and CC2.

The condenser units would respect the character and appearance of the building and surrounding area by virtue of their scale and siting. Whilst acknowledging the cooling hierarchy, the installation of the proposed condensers is considered reasonable to mitigate the overheating risk and ensure suitable internal conditions for the occupiers are maintained. Finally, the submitted noise assessment demonstrates that any increased noise generated from the new condensers would be imperceptible, and therefore its installation would not result in any undue noise disturbance to any sensitive receptors.

Therefore, we consider that the proposal is accords with the Development Plan and should be determined positive without delay.

### **Application Documents**

As part of the submission of the application on the Planning Portal, we enclose the following documents:

- Cover Letter, prepared by Gerald Eve;
- CIL Form, prepared by Gerald Eve;
- Application Form, prepared by Gerald Eve;
- Site Location Plan, prepared by Kendall Kingscott;
- Existing and Proposed Plans, Elevations and Sections, prepared by Kendall Kingscott;
- Design and Access Statement, prepared by Gerald Eve;
- Photographs, prepared by Kendall Kingscott;
- Plant Noise Impact Assessment, prepared by Environmental Equipment Corporation Ltd;
- Overheating Assessment, prepared by Kendall Kingscott; and
- Mitsubishi specification manual.

The application fee of £462 (Plus a Planning Portal admin fee of £32.20) has been paid online via the Planning Portal at the time of submission.

In the meantime, should you have any questions, please do not hesitate to contact Lucy Hale (0207 333 6286) or Sophie Thomson (020 7333 6297) of this office. We look forward to receiving notice of your receipt and validation.

Yours faithfully,



**Gerald Eve LLP**

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