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London Borough of Camden Planning and Borough Development 5 Pancras Square London N1C 4AG

FAO: Laura Dorbeck

Our ref: LEO/LHA/ASI/U0022019 Your ref: PP-11895901

20 April 2023

Dear Sir/Madam,

UCL Darwin Building, Gower Street, London, WC1E 6BT 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 full planning permission for two new chiller units and associated works on the roof of the Darwin Building, Gower Street, London, WC1E 6BT (the 'Site').

Planning permission is sought for the following:

"Replacement of existing roof mounted chiller unit with two new chiller units and associated works on the roof of the building."

Site and Background

This application relates solely to the roof of the Darwin Building, which is currently occupied for educational purposes. The Site is located on the east side of Gower Street, with Malet Place to the East, and Torrington Place to the South. The building is not statutory listed but is located within the Bloomsbury Conservation Area.

Surrounding buildings are predominantly educational and form part of the wider UCL campus, including the Grade II Listed Cruciform building, located on the adjacent side of Gower Street. There are also some clusters of residential uses nearby.

The Site has a PTAL rating of 6b owing to its proximity to Euston Square underground station. 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

A planning history search has been undertaken using Camden's planning register to establish the planning record for the Site. A summary of the relevant planning history has been set out below.

On 19th May 2022, an application for full planning permission (2022/1578/P) was granted for the following:

"Installation and replacement of plant and associated equipment at roof level, and installation of two chilled water pipes and several wall-mounted grilles at rear elevation, and other associated works."



On 19th August 2008, an application for full planning permission (2008/3078/P) was granted for the following works:

"Installation of 6 chillers at roof level."

On 31st March 2006, an application for full planning permission (2005/4254/P) was granted for the following works:

"Replacement of one window with louvres at rear elevation and installation of new condenser unit to roof."

On 12th November 2004, an application for full planning permission (2004/3883/P) was granted for the following works:

"Replacement of 13 new windows and three half windows with louvres, installation of a duct from ground floor to third floor and the installation of a louvred enclosure on the roof above existing lightwell."

On 28th May 2004, an application for full planning permission (2004/0908/P) was granted for the following works:

"Extension of existing flues sited at roof level to east elevation by 3.5m."

On 27th January 2004, an application for full planning permission (PSX0304221) was granted for the following works:

"The installation, within a louvre enclosure, of two dry air coolers, above air ventilation housing, as part of a combined heat and power scheme in basement."

On, 11th February 2003, an application for full planning permission (PSX0205308) was granted for the following works:

"Installation of ductwork to rear of Darwin Building, as shown on drawing numbers: 19305/MSK/EN10, UCL/NGP/L/GA000, Unnumbered Photographs."

On 9th April 2002, an application for full planning permission (PSX0105389) was granted (subject to conditions) for the following works:

"Refurbishment at basement and sub-basement levels and the installation of roof plant and six ducts, as shown on drawing numbers; 5351M-027; 028, 010 Rev.A; 1616/C02; 44/01/02; 44/01/01."

On 18th July 2000, an application for full planning permission (PSX0004604) was granted (subject to conditions) for the following works:

"The installation of 4 roof mounted chiller units to the rear overlooking the new engineering yard. (as shown on drawing numbers 44/101/55, 44/101/56, 141/493/E, 44/01/10, 44/101/54, 44/50/497, 44/50/498 and 44/50/499)."

On 15th October 1992, an application for full planning permission (9200666) was granted for the following works:

"The retention of five exhaust ducts stacks and fans on the rear elevation."

On 4th February 1987, an application for full planning permission (8601541) was granted (subject to conditions) for the following works:

"Installation of new exhaust ducts stacks and roof mounted fans and repositioning of existing stacks and fans all on the rear elevation to serve the fume cupboards of the refurbished laboratories of the Joint School of Medicine as shown on drawings 52701/AR/7114 7115 and 7116 and 1 unnumbered site plan."

On 30th January 1985, an application for full planning permission (8401961) was granted (subject to conditions) for the following works:

"Retention of fume extract duct."

On 31st August 1982, an application for full planning permission (34224) was granted for the following works:



"The erection of a fan and duct terminal on top of the service lift motor room."

As demonstrated by the relevant planning history set out above, a wide range of applications for full planning permission have been granted at the Site relating to the installation and replacement of plant and associated equipment.

The Proposal

Planning permission is sought for two chiller units following the removal of an existing external chiller unit on the roof of the Darwin Building.

The proposed external works are in association with the proposed internal refurbishment of six temperature-controlled rooms at the third floor level of the building. As part of these works, an end-of-life chiller is proposed to be replaced with a more-efficient unit in the exact location, and a further unit proposed to be installed on a big foot support system, alongside a buffer vessel and associated pipework, in close proximity on the roof. It is proposed to replace the current outdated chiller with two new more efficient units to serve the space.

The proposed works are set out in further detail in the 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. Accordingly, the proposals are assessed against the policies of the London Plan (adopted 2021) and Camden's Local Plan (adopted 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 within a Conservation Area, consideration has been given to Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Planning Policy Assessment

Design and Heritage

Policy D1 of Camden's Local Plan sets out that the Council will seek to secure high quality design in development and requires that development respects local context and character.

Policy D2 of Camden's Local Plan sets out that the Council will seek to preserve and where appropriate, enhance heritage assets and their settings, including conservation areas. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits.

The proposed external works involve the replacement of an existing roof mounted chiller unit with two new chiller units in a similar location. One of the units would be an exact replacement in respect of location and scale as the current unit. As such, there would no material change as a result of this replacement. In addition, a new unit is proposed to be located on a big foot support system with a vessel and associated pipework, between current plant and equipment. The proposed new unit would sit in line with existing plant, in terms of massing and height on the roof and would be read in line with the existing situation.

The proposals will be located at roof level and will be read in line with existing plant and associated equipment. The proposals would not be easily read from the street level and would be in line with the existing views to this Site from other areas within the Conservation Area. Furthermore, where possible, any redundant services associated with the existing chiller unit will be removed to reduce any unnecessary clutter on the roof of the building.



Overall, the proposals are considered to preserve the character and appearance of the Bloomsbury Conservation Area and will not have an impact on the significance of nearby listed buildings. Therefore, the proposal complies with Policies D1 and D2 of the Local Plan.

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 Noise Impact Assessment has been prepared by Environmental Equipment Corporation Ltd to assess the impact of the proposals at the Darwin Building on sensitive residential receptors nearby.

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'.

Active cooling has historically existed within the building and the proposals seek to retain active cooling through more efficient measures as part of the laboratory refurbishment works to six temperature-controlled rooms. An extensive planning history is set out above for existing plant equipment located on the roof at the Site. In addition, it is understood that the unit which is to be replaced as part of these proposals has been installed for at least four years. Therefore, it would now be considered lawful development, should it not benefit from a specific planning permission.

The new units are more efficient and will be replacing an existing unit which provides active cooling to the building which is at end of life and no longer suitable to serve its purpose. The proposal will not be increasing the level of active cooling in the building but instead will just be replacing and upgrading the existing active cooling for existing temperature-controlled laboratory spaces.

An Overheating Assessment has not been undertaken, as no additional mechanical cooling systems are being installed for the sole purposes of providing occupant thermal comfort, the upgrades relate to improvements to active cooling to laboratory rooms. Therefore, the proposal complies 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 chiller units in association with the existing temperature controlled rooms will improve the function of these laboratory spaces which will benefit both staff and students of the University. The proposed works will enhance the existing educational use, the proposal therefore complies with Local Plan Policy C2.



<u>Summary</u>

In conclusion, the proposed development complies with the relevant policies of Camden's Local Plan, namely Policies D1, D2, A1 and CC2. Furthermore, the works would accord with the Planning (Listed Buildings and Conservation Areas) Act 1990.

The proposed works would preserve the character and appearance of the wider Bloomsbury Conservation Area. With the cooling hierarchy in mind, the proposals will replace the existing unit with more efficient units and does not seek to increase the level of active cooling within the building and will continue to serve laboratory spaces. Furthermore, the Noise Impact Assessment demonstrates that any increase in the noise generated from the new chiller units 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 accords with the Development Plan and should be determined positive without delay.

Application documentation

In accordance with the London Borough of Camden's validation requirements, the following documents have been submitted in support of this application:

- Application form, prepared by Gerald Eve LLP;
- Covering Letter, prepared by Gerald Eve LLP;
- CIL Additional Information form, prepared by Gerald Eve LLP;
- Site Location Plan, prepared by Kendall Kingscott;
- Existing and Proposed Plans and Elevations, prepared by Kendall Kingscott;
- Proposed Detail Drawing; prepared by Kendall Kingscott;
- Design and Access Statement, prepared by Gerald Eve LLP;
- Noise Impact Assessment, prepared by Environmental Equipment Corporation Ltd; and
- Trane specification manual.

The requisite 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.

Please do not hesitate to contact Lucy Hale (020 7333 6286) or Aadam Siddiqui (020 7333 6246) of this office should you have any questions or concerns. We look forward to receiving notice of your receipt and validation.

Yours faithfully,

Gerald Eve UP

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