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

FAO: Laura Dorbeck

Our ref: LEO/PIR/ASI/U0023117

Your ref: PP-12165869

05 June 2023

Dear Laura,

UCL Bidborough House, 38-50 Bidborough Street, London, WC1H 9BT
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 the installation of two condenser units, louvre bank and ductwork at Bidborough House, 38-50 Bidborough Street, London, WC1H 9BT (the 'Site').

Planning permission is sought for the following:

"Installation of two external condenser units and associated equipment."

Site and Background

The Site is located on Bidborough Street, with Judd Street to the East, Hastings Street to the South and Mabledon Place to the West. The building is currently occupied by a variety of professional services which are linked to the University.

The building is not statutory listed but is located in close proximity to the Grade II listed Camden Town Hall. The building is also located adjacent to, but not within, the Bloomsbury Conservation Area. The immediate surrounding area is mixed in nature, comprising student housing and a range of commercial uses including hotels and retail.

The Site has a PTAL rating of 6b owing to its close proximity to Euston Square Underground Station and King's Cross & St Pancras Underground Station. 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 26 April 2021, an application for full planning permission (2020/5133/P) was granted for the following:

"Temporary change of use of the Ground to Fourth Floor of Bidborough House from Offices (Class E) to Education (Class F1) comprising of student study space and associated works for a period of two years until 30th June 2022 (academic years 2020/2021 and 2021/2022)."

On 10 April 2015, an application for full planning permission (2015/0933/P) was granted for the following:

“Replacement of existing doors to main and secondary entrances with powder coated aluminium/stainless steel framed and glazed entrance doors to main entrance and new revolving/air-lock door with adjacent fire exit/pass door to secondary entrance.”

On 27 November 2007, an application for full planning permission (2007/4769/P) was granted for the following:

“Alterations to existing Mabledon Place and Bidborough Street entrances including the creation of a new public entrance on Bidborough Street, new railings, replacement of all windows and roof coverings, re-cladding of existing concrete panels, new external service risers to the rear elevation and new roof plant and acoustic enclosures at fifth floor and roof level, and solar panels at seventh floor level all to existing office building (Class B1).”

On 12 July 1996, an application for full planning permission (P960112R1) was granted for the following:

“Alterations to the Mabledon Place elevation comprising the erection of new doors and a disabled persons access ramp together with associated alterations to the highway, as shown on drawing number PL/01B, /02 and /03A.”

As demonstrated by the relevant planning history set out above, various alterations and additions have been made to the building over the years.

The Proposal

With the aim of using their buildings more effectively and providing more opportunities for teams to collaborate and connect with other parts of the university, the Workplace Health department have been relocated from another building within the UCL estate to Bidborough House. Given the nature of how the department operates, a number of the existing rooms have been converted to consultation rooms, still operating with the Class E use. However, in order to ensure that the rooms are fit for purpose, a number of external changes are required.

Planning permission is therefore sought for the installation of two new condenser units, one with an acoustic enclosure, located within the undercroft to the rear service yard area, and associated equipment included new louvre bank and ductwork.

The proposed works are required in order to aid the ventilation of the consultation rooms at ground and first floor level. In order to keep the indoor air quality at a safe level for patients and reduce the risk of airborne infections, these rooms require an enhanced ventilation rates of 20 air changes an hour.

Due to the increased ventilation requirements, it is not possible to utilise the existing system which is running at full capacity. Therefore, in order to meet the space requirements, a supplementary system is proposed on each floor, consisting of two air handling units housed within plantrooms on each floorplate. These units require ductwork connections to the atmosphere to intake fresh air and to exhaust potential contaminated air from the spaces. This ductwork is proposed to be mounted to the underside of the first-floor slab, in the enclosed service area.

In addition to the internal plant equipment proposed, external air handling units need to be provided with DX coils to regulate the air intake temperatures in peak summer and winter months. Therefore, two external air handling units are proposed at ground level, and will be located within the undercroft to the rear service yard, similar to the aforementioned ductwork.

This planning application relates specifically only to the external changes/installations to the building. All internal work, including installation of plant, and manifestations on select windows, do not require planning permission but are included on planning drawings for reference.

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.

Due to the Site's close proximity to the Bloomsbury Conservation Area, consideration has also been given to Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Planning Policy Assessment

Design

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. The policy also states that the Council will require that development is inclusive and accessible for all and promotes health where appropriate.

Policy D2 of Camden's Local Plan (Due to proximity to Bloomsbury Conservation Area) 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 condenser units and associated equipment will be located to the rear of Bidborough House, within a largely enclosed service yard area, which benefits from a shutter fronting Bidborough Street. Given the discreet location and modest size of the condensers, they would not be readily visible or obtrusive additions to the street scene. The associated equipment is proposed be mounted on the undercroft of the building, so would similarly not be readily visible. Due to the location of the proposed equipment, it will not be visible from within the Bloomsbury Conservation Area and will therefore preserve the character of the area.

Overall, the proposals are considered to comply with Policies D1 and D2 of Camden's Local Plan, and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as the proposals are considered to preserve the character and appearance of the nearby Bloomsbury Conservation Area.

Noise and Vibration

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

An Environmental Noise Survey Report has been prepared by Quantum Acoustics to assess the noise emissions of the proposed new external mechanical services and plant at Bidborough House. The prevailing background noise levels have been measured and used to set noise limits for the proposed plant.

When assessed against the Camden's noise guidance, it was found that one of the condensers would exceed the Camden's noise rating level limits. In order to ensure that the noise levels are not exceeded, the noisier condenser is proposed to be located within an acoustic enclosure to provide suitable attenuation.

The Environmental Noise Survey Report concludes that the proposed development is considered as suitable in relation to noise and acoustic concerns provided that the acoustic enclosure is installed around one of the two condenser units. An acoustic enclosure has therefore been incorporated into the proposals to ensure the development complies 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'.

As noted above, the primary purpose of the equipment is to ventilate the consultations room. In order to ensure that this is successfully achieved, cooling/heating coils are incorporated in the external air handling units to temper the external air so as to avoid bringing in extreme air temperatures, being -4°C (winter) or 33 °C (summer) into the space. Therefore, there is no comfort cooling in the typical sense, and this will only be triggered in extreme weather conditions.

On this basis, as comfort cooling is not proposed as part of the works, the application has not been accompanied by an overheating assessment.

Enhancing Community Facilities

Policy C2 of Camden's Local Plan sets out their support for 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 condensers and associated equipment will support the Workplace Health department locating into Bidborough House and will support the function of the consultation rooms, for the benefit of the staff and students at the University. In addition, the consolidation of various professional services into a single building will help to enhance efficiencies within the university.

Overall, the proposals are considered to comply with Policy D2 of Camden's Local Plan.

Summary

In conclusion, the proposed development complies with the relevant policies of Camden's Local Plan, namely Policies D1, D2, A1, A4, CC2 and C2.

The condensers and associated external equipment would be sensitively located within the largely enclosed servicing area, away from the Bidborough Street frontage. The development would therefore not be obtrusive in its appearance and would not have a detrimental impact on the character or appearance of the building, street scene, or neighbouring conservation area. The privacy film would similarly have an acceptable impact.

Furthermore, any noise generated from the condensers would be within acceptable limits when the proposed acoustic enclosure is considered and therefore the development would not give rise to undue noise disturbance.

Therefore, we consider that the proposal accords with the Development Plan and should be determined positively 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 Architon LLP;
- Existing and Proposed Plans and Elevations, prepared by Architon LLP;
- External Plant Note, prepared by Hoare Lea;
- Condenser Specifications, prepared by Mitsubishi Electric Corporation; and
- Environmental Noise Survey Report, prepared by Quantum Acoustics.



The requisite application fee of £462.00 (Plus a Planning Portal admin fee of £64.00) has been paid online via the Planning Portal at the time of submission.

Please do not hesitate to contact Paige Ireland (020 7333 6277) 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 Sincerely,

Gerald Eve LLP

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