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London Borough of Camden
Planning and Borough Development
5 Pancras Square
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FAO: Laura Dorbeck

05 July 2023

Our ref: LEO/LHA/AME/U0022021

Your ref: PP-11886523

Dear Sir/Madam,

Town and Country Planning Act (as amended) 1990
Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)
UCL Ear Institute, 75 Wicklow Street, London, WC1X 9JY
Application for Full Planning Permission and Listed Building Consent

We write on behalf of our client, University College London ('UCL') (the 'Applicant') to submit a planning application for full planning permission and listed building consent for internal and external works at the UCL Ear Institute, 75 Wicklow Street, London, WC1X 9JY (the 'Site').

Full Planning permission is sought for:

"Installation of new condenser unit at roof level, two new roof lights, and associated works."

Listed Building Consent is sought for:

"Installation of internal A/C unit on the wall and associated pipework; removal and replacement of existing flooring and lighting; replacement of broken window pane; other internal refurbishment and redecoration works; and installation of two new roof lights in the roof slope and condenser unit on the roof of the building."

Site and Background

The Ear Institute is located on Gray's Inn Road, with Trinity College to the East and Swinton Street to the West.

It is formed of three interconnecting buildings which function as one building, sharing a combined main entrance. The relevant part of the Ear Institute where the proposed works are located is 75 Wicklow Street, which is the former Church School of St Jude's Church, a Grade II listed building (entry ref. 1379193).

The Site is also designated on the Council's Policy Map as within the King's Cross St Pancras Conservation Area. The Site has a PTAL rating of 6b owing to its proximity to King's Cross underground station. Russell Square and Euston underground, overground and railway stations are also within a short walking distance. There are also multiple bus routes serving the area.

Relevant Planning History

The Camden online planning register has been checked but there was no relevant planning history for 75 Wicklow Street.

For reference, an application is currently under determination at 332 Gray's Inn Road, which forms part of the Ear Institute (ref. 2022/0386/P) for the partial demolition of the existing building and erection of replacement service area.

The Proposals

The proposals seek to provide an improved working environment for students of the Ear Institute through the refurbishment and re-decoration of study spaces. The proposals relate to both internal and external works, as such, planning permission and listed building consent is sought for the proposed refurbishment and redecoration works to 75 Wicklow Street.

A summary of the proposed external and internal works are set out below for ease. More details can be found in the supporting drawings and schedule of works document, prepared by Kendall Kingscott.

1. Condenser Unit – installation of new Mitsubishi MUZ-AP35VG model condenser unit (0.9m wide x 0.9m high x 0.35m deep), on the roof of the building to sit alongside existing plant.
2. Internal A/C Unit – new internal unit on the wall of room G39 adjacent to the entrance, and associated pipework feeding externally to the new condenser unit.
3. Roof Lights – installation of two new roof lights on the west side of the pitched roof slope serving room G39.
4. Windows – overhaul of windows and replacement of broken window pane. Removal of redundant security bars.
5. Radiators – removal of two existing radiators.
6. Walls – new high level boxing to contain existing services and re-decoration of walls.
7. Flooring – replacement of existing flooring and new skirting.
8. Lighting – replacement of existing lighting.
9. Ceiling – redecoration of ceiling. Insulation of wood fibre under side of pitched roof.
10. Furniture – removal of redundant desks, benches, shelving and equipment.

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.

Legislative Framework

Statute regarding the heritage environment is relevant to this application. Both the site's historic fabric and the surrounding environment have been carefully considered in the development of the proposals having regard for the statutory legislation set out below.

Section 16 of Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant listed building consent, special regard shall be paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that local planning authorities should pay special regard to the desirability of preserving a listed building or its setting or any features of historic or architectural interest which it possesses when considering applications.

Section 72 of the same Act states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

National Planning Policy Framework

Under paragraph 194 of the NPPF, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including the contribution made by their setting. Paragraph 197 states that in determining planning applications, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
- The desirability of new development making a positive contribution to local character and distinctiveness. The Framework goes on to state under paragraph 202 that where a development proposal will lead to a 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 securing its optimum viable use.

Where a development proposal will lead to a 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 securing its optimum viable use (paragraph 202).

Planning Assessment

Design and Heritage

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.

Camden's Local Plan Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, especially the conservation areas and listed buildings. To maintain the character of Camden's conservation areas, the Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. The Council will also resist development that would cause harm to the significance of a listed building through an effect on its setting or would cause harm to its special architectural and historical interest.

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 general purpose of the proposal is to provide an improved working environment for UCL students of the Ear Institute through the refurbishment and redecoration of the study space which is outdated and suffers from poor insulation and ventilation and is generally outdated.

To assess the impact of the proposals on the significance of the listed building, and the King's Cross and St Pancras Conservation Area, a Heritage Assessment has been submitted, prepared by Gerald Eve, and appended to this cover letter.

In summary, the proposed works are minor in nature and would preserve the significance of the listed building. Improvements to the building will be made through the removal of later additions and outdated elements, as well as repair works which will be undertaken. Should the Council consider the proposed works to cause any degree of less than substantial harm to the building, we would note the importance of the work in sustaining the listed building in a viable use and the wider benefits to education and operational energy efficiency arising from the proposals in this instance.

Overall the proposed works would preserve the significance of the listed building and the character and appearance of the King's Cross / St Pancras Conservation Area. Therefore, they are considered to be in accordance with the Local Plan Policies D1 and D2, as well as relevant national policy relating to the historic environment. Furthermore, the applications would satisfy the statutory provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Amenity

Policy A1 of the 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 the 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, including in terms of daylight and sunlight.

It is proposed to install a new Mitsubishi MUZ-AP35VG condenser unit (900cm W x 900cm H x 350cm D) on the roof of the building, to sit alongside several existing units.

A supporting Noise Impact Assessment, prepared by Environmental Equipment Corporation Ltd has been submitted which assess the potential noise impact of the proposed plant at the site on the closest residential receptors. The assessment has been conducted in accordance with the policies and requirements of London Borough of Camden (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 the 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, as set out in Policy CC2(d).' Additionally, 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'.

An Overheating Assessment, prepared by Kendall Kingscott supports this application as active cooling is proposed in relation to the refurbishment of room G36 which comprises a quiet study space at ground floor.

Room G36 comprises brick walls, single glazed windows and a pitched roof. The existing room is heated with electric panel heater. It is proposed to replace the existing electric panel heaters with a heat pump to reduce CO2 emissions and energy usage. One window faces onto an adjacent internal area, one window does not have opening lights and the third has a small opening light which provides minimal ventilation. It is proposed to also install roof lights to improve natural light and ventilation, however these will be reasonably small as to respect the heritage asset. The pitched roof will have thermal insulation added under the existing roof construction.

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 for these spaces. Room G36 has been tested and the results indicate a non-complaint model with excessive overheating. The modelled spaces require comfort cooling to ensure suitable environmental conditions.

The new plant will provide active cooling to the room via an efficient system which will ensure that the space provides suitable environmental conditions in the interests of health, wellbeing, and productivity of the users of the spaces. 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 proposed works will make the study space more comfortable and enjoyable for the students and staff, resulting in a more fit for purpose and improved space that will meet the needs of the students and enhance the existing educational use. The proposal complies with Local Plan Policy C2.

Conclusion

In conclusion, the proposed development complies with relevant policies of the Camden Local Plan, namely Policies D1, D2, A1 and C2. Furthermore, the works would accord with the Planning (Listed Buildings and Conservation Areas) Act 1990 and Section 16 of the NPPF.

The proposed works to facilitate the refurbishment of the building would be sensitive to the heritage asset and would not involve any adverse disturbance or interventions to the listed building and fabric, which would undermine its significance. The installation of the roof lights and condenser unit would preserve the character and appearance of the wider Conservation Area.

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 condenser 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 in accordance with the Development Plan and should be determined positively without delay.

Application Documents

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

- Application Form, prepared by Gerald Eve;
- CIL Form, prepared by Gerald Eve;
- Cover Letter, prepared by Gerald Eve;
- Design and Access Statement, prepared by Gerald Eve;
- Schedule of Works, prepared by Kendall Kingscott;
- Site Location Plan, prepared by Kendall Kingscott;
- Existing, Fabric Removal, and Proposed Plans, Elevation and Sections, prepared by Kendall Kingscott;
- 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 £64.00) has been paid online via the Planning Portal at the time of submission.

Should you have any queries, please contact Lucy Hale (0207 333 6286) or Abdul Mehdi (0207 333 6417) of this office. We look forward to hearing from you shortly.

Yours faithfully



GERALDEVE

Gerald Eve LLP

Gerald Eve LLP

**Ear Institute, 75 Wicklow Street – Room G39 Works
Heritage Assessment**

Introduction

1. On behalf of UCL, Gerald Eve has prepared a Heritage Assessment to accompany the planning and listed building consent application relating to internal and external works in association with the refurbishment of Room G39 of the UCL Ear Institute, 75 Wicklow Street, London, WC1X 9JY.
2. The Heritage Assessment identifies the significance of those parts of building where the proposed works are taking place, a summary of the proposals, and an assessment of how the proposals impact the heritage significance of the asset as a whole. The assessment also considers the effect of the proposals on the Kings Cross St Pancras Conservation Area.

Statutory Framework

3. The statutory provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 are relevant to this application. Both the building's fabric and setting have been considered in the development of the proposals having regard to the legislation set out below.
4. Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant listed building consent, special regard shall be paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
5. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that local planning authorities should pay special regard to the desirability of preserving a listed building or its setting or any features of historic or architectural interest which it possesses when considering applications.
6. Section 72 of the same Act states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

Planning Policy Context

7. Under paragraph 194 of the NPPF, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including the contribution made by their setting. Paragraph 197 states that in determining planning applications, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.
8. Where a development proposal will lead to a 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 securing its optimum viable use (paragraph 202).
9. Policy D1 of the Local Plan sets out that the Council will seek to secure high quality design that, amongst other things, respects local context and character and preserves or enhances the historic environment and heritage assets.
10. Policy D2 of the Local Plan sets out that the Council will seek to preserve and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, especially the conservation areas and listed buildings. To maintain the character of Camden's conservation areas, the Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. The Council will also resist development that would cause harm to the significance of a listed building through an effect on its setting or would cause harm to its special architectural and historical interest.

Assessment of Significance

11. The Ear Institute is formed of three interconnecting buildings which function as one building, sharing a combined main entrance. The relevant part of the Ear Institute where the proposed works are located is 75 Wicklow Street, which is the former Church School of St Jude's Church.
12. 75 Wicklow Street is a Grade II listed building located on Gray's Inn Road, with Trinity College to the East and Swinton Street to the West, in the London Borough of Camden.
13. The building was listed in 1974 (List Entry: 1379193) with the following list description:
- "Church School of St Jude's Church (demolished 1936) now offices and storage. 1872. By Joseph Peacock. Yellow stock brick with red brick bands and stone dressings. Hipped and gabled slate roofs. Gothic style. Irregular 2 storey and 3 storey facade on the corner of Britannia Street. 3 windows and 6-window return. Round-arched doorways with panelled doors; former main entrance on return with stone hood-mould. Stone dressed transom and mullion windows; ground floor windows to right

separated by a brick buttress terminating in a stone faced, pointed niche. Stone string above 1st floor windows with brick relieving arches over. 1st floor window on gable end with pointed head and hood-mould, 3 lights and trefoil tracery. A similar window on the return forming a gable. Ground floor windows on the return altered. INTERIOR: not inspected."

14. The site is also located within the King's Cross St Pancras Conservation Area. It covers the following areas:
 1. St Pancras Gardens: the area bounded by Chenies Place, Charrington Street, College Grove and the CTRL lines to the north of St Pancras;
 2. King's Cross/St Pancras: the stations and the area between them, extending to Goods Way and Camley Street;
 3. Euston Road: the buildings on the southern side of Euston Road and the junction with Pentonville and Gray's Inn Roads; and,
 4. Gray's Inn Road: The remaining area of the Conservation Area south of the Euston Road, bounded by Pentonville Road, King's Cross Road, Swinton Street, and Argyle Street.
15. The Site falls within Sub-Area 4 (Gray's Inn Road) of the Conservation Area designation.
16. The building is described in the Kings Cross St Pancras Conservation Area Statement (2003) as follows:

"It is constructed of stock brick with red brick banding and stone dressings and has a steeply pitched slate roof. All of the buildings on the north side of Britannia Street to the east of the junction with Wicklow Street are set back from the street which deviates from the sense of enclosure which is characteristic of the area between Gray's Inn Road and King's Cross Road."
17. It also noted as a prominent former church school building (described above) which defines the junction with Britannia Street. The building's Wicklow Street elevation incorporates a tall gable, red brick banding and a shaped, leaded window with a hood mould and trefoil tracery.
18. The works proposed are located to the rear of the building and internally within one study room.
19. To the rear of the building, set back behind the main elevation fronting Britannia Road and between a later addition to the Ear Institute, there is a slate pitched roof which is set down. A further pitched roof, which fronts Wicklow Street is adjacent. In between the pitched roofs there is a flat roof which hosts plant and associated works. Having regard to the asset as a whole, the heritage significance of this building primarily lies in its street facades, with the rear section of building considered to be of lesser significance.

20. Internally, the study room is located to the rear of the building under a pitched roof with exposed purlins, trusses and rafters. The brickwork has been painted internally. The room has been subject to various alterations over the years in respect of modern servicing, fittings, fixtures and furniture.

The Proposals and their Impact on Significance

21. The proposals seek to provide an improved working environment for students of the Ear Institute through the refurbishment and re-decoration of study spaces. The proposals relate to both internal and external works, as such, planning permission and listed building consent is sought for the proposed refurbishment and redecoration works to 75 Wicklow Street.
22. A summary of the proposed external and internal works are set out below for ease of reference. More details can be found in the supporting drawings and schedule of works document, prepared by Kendall Kingscott.
- Condenser Unit – installation of new Mitsubishi MUZ-AP35VG model condenser unit (0.9m wide x 0.9m high x 0.35m deep), on the roof of the building to sit alongside existing plant.
 - Internal A/C Unit – new internal unit on the wall of room G39 adjacent to the entrance, and associated pipework feeding externally to the new condenser unit.
 - Roof Lights – installation of two new roof lights on the west side of the pitched roof slope serving room G39.
 - Windows – overhaul of windows and replacement of broken window pane. Removal of redundant security bars.
 - Radiators – removal of two existing radiators.
 - Walls – new high level boxing to contain existing services and re-decoration of walls.
 - Flooring – replacement of existing flooring and new skirting.
 - Lighting – replacement of existing lighting.
 - Ceiling – redecoration of ceiling. Insulation of wood fibre under side of pitched roof.
 - Furniture – removal of redundant desks, benches, shelving and equipment.
23. The proposed works seek to provide an improved working environment for UCL students of the Ear Institute through the refurbishment and redecoration of the study space which is outdated and suffers from poor insulation and ventilation.

Works to the exterior of the building

24. The location of the proposed external condenser unit set down below the pitch of the roof, would not be visible from the street and would sit alongside existing plant on the roof. The discreet siting would not harm an appreciation of the building's external appearance. Given the level of significance of this rear area of the building, the proposed works are not considered to cause harm to the significance of the asset as a whole.

25. It is proposed to repair a broken window pane on the eastern elevation of the set down rear addition, which, in conjunction with the removal of the security bars, would enhance the special architectural and historic interest of the Listed Building.
26. The two new roof lights serving G39 which would be located on the rear set down roof pitch and would not be visible from the street.

Works to the interior of the building

27. The positioning of the two new rooflights would allow for the retention of the existing purlins and trusses. Two rafters would be cut to accommodate the rooflights, with additional trimmers to be fitted as required. The intervention is considered to be minimal and the size of the rooflights is appropriate to provide adequate ventilation and lighting to the room, while respecting the architectural and historic interest of the building. Furthermore, the proposed works could be reversed in the future should the rooflights no longer be deemed necessary. The proposed works would preserve the significance of the listed building.
28. The new internal A/C unit and associated pipework would be minor and reversible in nature and would not involve any adverse disturbance or interventions to the listed building and fabric.
29. The proposed works include replacement floor coverings and lighting, which will utilise existing fittings as well as general redecoration of walls. The works would be minor in nature and have been sensitively designed to have limited impact on the special architectural and historic interest of the buildings, requiring minimal intervention. Where possible, any redundant and outdated equipment will be removed, and it is also proposed to box in existing servicing to improve the aesthetic of this element in the room. Redundant furniture such as shelves, benches and radiators will also be removed and areas made good, where required.
30. The existing sash window in Room G39 is proposed to be overhauled to ensure it is fully operational. Repairs are also included to localised areas. These works are considered to contribute to the improvement of the efficiency of the building ensuring it is ventilated adequately, thereby reducing the risk of further issues with overheating of the rooms of the building.

Works within the Conservation Area

31. Works located within the interior of the building will not be visible externally.
32. The external works would be located to the rear of the building and set below the main roof pitch of the building fronting both Britannia Road and Wicklow Street. The two new roof lights serving G39 have been sympathetically designed and would be located within the set down roof pitch to the rear of the building, not visible from the street. The proposed external condenser unit would be located below the set down pitch of the roof, sitting alongside existing plant on the roof and would also not be visible from the street. The discreet siting would preserve the character and appearance of the Conservation Area.

Heritage Assessment

33. Overall, the proposed works are minor in nature and would preserve the significance of the listed building. Improvements to the building will be made through the removal of later additions and outdated elements, as well as repair works which will be undertaken. Should the Council consider the proposed works to cause any degree of less than substantial harm to the building, we would note the importance of the work in sustaining the listed building in a viable use and the wider benefits to education and operational energy efficiency arising from the proposals in this instance. To conclude, the proposed works would preserve the significance of the listed building and the character and appearance of the King's Cross / St Pancras Conservation Area. Therefore, they are considered to be in accordance with the Local Plan Policies D1 and D2, as well as relevant national policy relating to the historic environment. Furthermore, the applications would satisfy the statutory provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990.