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Our ref: LEO/LHA/BGI/U0025265
Your Ref: PP-12587286

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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 the replacement of existing plant and installation of new plant and associated works on the roof of the Darwin Building, Gower Street, London, WC1E 6BT (the 'Site').

Planning permission is sought for the following:

"Removal of existing plant including two air handling units, two condenser units and ductwork, and replacement with the installation of two new air handling units, eight condenser units, one humidifier, new ductwork and associated works, on the roof of the Darwin Building."

Site and Background

This application relates 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

The general purpose of the proposal is to replace existing plant and install new plant and associated equipment on the roof of the Darwin Building, which serve temperature-controlled laboratory rooms on the fourth floor of the Anatomy Building, which are no longer fit for purpose.

The Biological Services Unit (BSU) on the fourth floor of the Medical Science and Anatomy Building benefits from the following plant on the roof of the adjacent Darwin Building:

- AHU 1 ;

- AHU2;
- 2 x Condenser Units; and
- Ductwork and other associated equipment.

Both existing AHU1 and AHU2 are dedicated to the BSU and are to be replaced with new units to ensure that the air supplied into the facility meets Home Office requirements. To ensure that the air supplied by the two AHUs is at the correct temperature and humidity, an external mounted humidifier will be required. The two existing condenser units which are outdated will also be replaced and upgraded with additional units, for greater efficiency purposes.

In summary, planning permission is sought for the following works on the north-west side of the roof of the Darwin Building:

- 2 x replacement air handling units (AHUs);
- 2 x replacement condenser units and 6 x new condenser units;
- Replacement ductwork; and
- 1 x new humidifier.

The proposed works are set out in further detail in the Drawings and Supporting Document, prepared by DMA Group.

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) (2023);
- National Planning Practice Guidance (NPPG) (as amended); and
- London Borough of Camden's Supplementary Planning Documents.

Camden also published the Local Plan Review (Regulation 18 consultation) on the 17 January 2023, however, given its stage in the process, this holds limited weight.

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

<u>Design and Heritage</u>

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 proposals include the replacement of two AHU, two condenser units and ductwork and installation of an additional six condenser units and one new humidifier, and associated works on the roof of the Darwin Building.

In respect of the replacement plant, the two AHUs, two condenser units and ductwork will be installed in the same location as the existing units and associated equipment on the roof. Both AHUs would be larger in scale and sit taller than the existing units. Given the set back of AHU2, this would not be visible from the street. In respect of AHU1, part of the plant would be visible from street level given its position closer to the front building line, however it would be read alongside existing plant on the roof of the building, which is established, and along the street, as such, it is not considered to result in a detrimental impact on the character and appearance of the Conservation Area.

In respect of the new units to be installed, the condensers and humidifier would be located alongside the proposed replacement plant where rooftop plant is established. Much of the plant proposed would not be easily read from street level. One condenser which is proposed to be located closest to the front building line may be partly visible however, it would be of modest scale and would not appear out of character in respect of the roof of the building and along the street.

Overall, plant is established on the roof of the building and surrounding area and there would be little material change to the current situation as a result of the proposals, which are required to ensure the function and compliance of important laboratory space Furthermore, where possible, any redundant services associated with the existing units will be removed to reduce any unnecessary clutter on the roof of the building, such as the fume extract.

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 and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

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 Hoare Lea 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 assessment of the proposals indicates that plant noise levels are expected to be -6 dB below prevailing background sound levels when assessed the nearest noise-sensitive receivers. Noise mitigation required to reduce noise emissions to below the LOAEL, is in the form of attenuation on the AHU atmospheric connections.

Camden's site specific noise threshold for the LOAEL of the proposed plant is achievable. The proposals are therefore compliant with the strategic objectives of Camden's Policy A4 which seeks to prevent "development likely to generate unacceptable noise and vibration impacts". 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 relate to the refurbishment of laboratory spaces on the fourth floor of the Anatomy Building.

Ventilation to the main laboratory area dates back to 1980 and is no longer compliant, with Health, Safety and Compliance compromised by low ventilation rates. As such, a new system is proposed to meet current standards. Increased ventilation rates will enable the laboratories to continue in operation and ensure they are suitable to serve their purpose. A constant volume terminal reheat ventilation system is being provided, which is standard for this type of facility. The installation will meet modern standards and will result in improved efficiency over the current system, which it will replace. The installation comprises of the following:

- New air handling unit (AHU 1) with increased airflow to meet current standards;
- Central Heat pump heating and cooling;
- New ductwork installation; and
- Electrical reheaters.

A secondary laboratory space within the facility has been installed more recently, however the existing air handling unit is life expired and is proposed to be replaced. The proposed unit will provide the same function as the existing unit; however, it will be of modern standards and with improved efficiency.

Active cooling has historically existed within these spaces and the proposals do not seek to increase the level of active cooling but instead will replace and upgrade the existing active cooling for 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 spaces.

The proposals 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 more efficient units in association with the existing temperature-controlled rooms will improve the function and compliance 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.

Summary

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 regard to the cooling hierarchy, the proposals will replace the existing units with more efficient units and will continue to serve active cooling to existing laboratory spaces. Furthermore, the Noise Impact Assessment demonstrates that any increase in the noise generated from the units would be imperceptible and therefore its installation would not result in any undue noise disturbance to any sensitive receptors.

Therefore, 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;
- CIL Additional Information form, prepared by Gerald Eve LLP;
- Covering Letter, prepared by Gerald Eve LLP;
- Site Location Plan, prepared by DMA Group;
- Existing and Proposed Roof Plans and Elevations, prepared by DMA Group;
- Supporting document, prepared by DMA Group;
- Design and Access Statement, prepared by Gerald Eve LLP; and
- Noise Impact Assessment, prepared by Hoare Lea.

The requisite application fee of £578 (Plus a Planning Portal admin fee of £64) has been paid online via the Planning Portal at the time of submission.

Please do not hesitate to contact or Lucy Hale ([redacted]) or Ben Gibbs ([redacted]) 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 LLP

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