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Our ref: LEO/SNE/PIR/BGI/U0026999
Your Ref: PP-13308054

09 August 2024

1-19 Torrington Place, London, WC1E 7HB
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 new plant and associated works on the roof of 1-19 Torrington Place, London, WC1E 7HB (the 'Site').

Planning permission is sought for the following:

"Installation of condenser unit within louvred enclosure on level 2 roof, and associated works."

Site and Background

This application relates to the roof of 1-19 Torrington Place, which is currently occupied by various UCL academic departments, professional services and teaching and learning spaces, as well as a data centre at sub-basement level. The building is leased to UCL by Bedford Estates.

The Site is a part two, part six and part eleven storey building located at the corner of Torrington Place and Tottenham Court Road. The Site is located within the Bloomsbury Conservation Area but is not a listed building. It does, however, sit within the vicinity of a number of listed buildings, including 18 -26 Torrington Place which is Grade II* listed.

The Site benefits from a public transport accessibility level (PTAL) of 6b, which is the best rating. The high rating can be attributed to the Site's proximity to a number of underground stations including Goodge Street, Tottenham Court Road, Euston Square, Russell Square and Warren Street. There are also 17 bus routes serving the Site.

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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

On 7th February 2024, an application for full planning permission (2022/3535/P) was granted for the following:

"Temporary change of use for a period of up to 10 years for flexible office E(g)(i) and education F1(a) (excluding retail and other commercial units on Tottenham Court Road frontage, the data centre at basement and part ground floor levels and the UKPN substation)."

On 16th October 2013, an application for full planning permission (2013/6364/P) was granted for the following works:

"Installation of enclosed plant/equipment in rear basement car park (Class D1)."

On 7th June 2013, an application for full planning permission (2013/2981/P) was granted for the following works:

"Installation of new air handling unit and ducting (following the removal of existing air handling equipment) and lighting equipment on first floor roof top of building (Class D1)."

On 2nd November 2009, an application for full planning permission (2009/4718/P) was granted for the following works:

"Installation of a chiller unit and extension to an existing plant enclosure screen on the roof of the five storey building fronting Tottenham Court Road in mixed office (Class B1) and education (Class D1) use."

On 16th February 2004, an application for full planning permission (2003/3120/P) was granted for the following works:

"Installation of disabled ramp to entrance to Tottenham Court Road elevation, minor external alterations and installation of plant equipment within rear car park area to 1-19 Torrington Place."

On 6th October 1986, an application for full planning permission (8601893) was granted for the following works:

"Erection of a satellite dish antenna at roof level as shown on drawings numbered 220 and JT11468."

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 of plant and associated equipment.

The Proposal

The general purpose of the proposal is to install a new condenser unit to the level 2 roof. The condenser will be located within a louvred acoustic enclosure as a mitigation to meet noise requirements provided by the acoustic consultant in accordance with Camden's policy. Additionally, a new refrigerant pipework tray will run from the condenser into the building at level 2.

UCL are proposing internal refurbishment at level 1 of the building. External plant machinery is required in connection with the refurbishment.

The proposed works are set out in further detail in the drawings and Design and Access Statement, prepared by Rivington Street Studio.

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

The Government has recently published consultation on an updated draft of the NPPF, which is open for consultation until 24 September 2024. No changes are proposed to the text of Chapter 16, Conserving and Enhancing the Historic Environment.

Camden is in the process of preparing a new local plan which aims to set out the Council's vision for future development in Camden for the next 15 years. The draft local plan was subject to a Regulation 18 consultation in early 2024, with target adoption due in Summer 2026. Due to the progress of the draft local plan, at this stage limited weight is given to the draft policies when assessing the proposals.

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 proposals include the installation of a condenser unit contained within a louvred acoustic enclosure and associated pipework on the roof of 1-19 Torrington Place.

Given the set back of the proposed condenser unit, and as demonstrated from the supporting line of site plan, it would not be visible from the street scene along Torrington Place, as such, it is not considered to have an adverse visual impact and will maintain the character and appearance of the Bloomsbury Conservation Area.

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 educational space.

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.

An Acoustic Report has been prepared by Adnitt Acoustics to assess the impact of the proposals at 1-19 Torrington Place on sensitive receptors nearby in accordance with the Council's policy requirements.

The assessment of the proposals indicates that plant noise levels were expected to be above the planning noise limit at various sensitive receptor locations. Therefore, acoustic treatments are recommended which include the installation of an acoustic louvre enclosure. With such measures in place, the plant noise level would be in accordance with the required noise limit thresholds at the nearby sensitive receptor locations.

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'.

As part of internal refurbishment works to level 1 at the Site, the proposed plant will be a replacement to existing inefficient plant which provides heating and cooling to the building. As this proposed relates to replacement of existing cooling plant, we do not consider a thorough assessment against the cooling hierarchy is required.

As the proposals will be replacing existing active cooling within the building, it 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 a more efficient unit will improve the function and compliance of this educational space, 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

The proposal relates to the installation of a condenser units, and associated acoustic enclosure, on the level 2 roof of 1-19 Torrington Plan.

The proposed works would preserve the character and appearance of the wider Bloomsbury Conservation Area. Furthermore, the Acoustic Report demonstrates that any increase in the noise generated from the units would be diminished by the louvred enclosure and therefore its installation would not result in any undue noise disturbance to any sensitive receptors.

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.

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 Form, prepared by Gerald Eve LLP;
- Covering Letter, prepared by Gerald Eve LLP;
- Site Location Plan, prepared by Rivington Street Studio;
- Existing and Proposed Roof Plans and Elevations, prepared by Rivington Street Studio;
- Design and Access Statement, prepared by Rivington Street Studio; and

- Acoustic Report, prepared by Adnitt Acoustics.

The requisite application fee of £578 (Plus a Planning Portal admin fee of £70) has been paid online via the Planning Portal at the time of submission.

Please do not hesitate to contact or Sam Neal [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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