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Our ref: LEO/PIR/BGI/U0027006
Your Ref: PP-13624359

2 December 2024

Gordon House, 29 Gordon Square, London, WC1E 0PP
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 the removal of existing plant and installation of new plant and associated works at the Gordon House, 29 Gordon Square, London, WC1H 0PP 6BT (the 'Site').

Planning permission and listed building consent is sought for the following:

"Removal of 2 x external condensers and replacement with 2 x external condensers within the lightwell, and associated works."

Site and Background

This application relates to Gordon House which is in educational use. The building is five storeys (including basement) and has its main entrance on Gordon Street. Surrounding uses are predominantly educational, with buildings forming part of the UCL Bloomsbury campus.

The building is located within the Bloomsbury Conservation Area. Whilst the Site is not listed and none of the immediately adjacent buildings are listed, the Site is in close proximity to a Grade II listed lamp which is located at the corner of Gordon Street and Gordon Square. 16-25 Gordon Square which is a Grade II listed terrace is also located within close proximity to the Site.

Relevant Planning History

A planning history search has been undertaken using Camden's planning register. From this search, it has been determined that there is no relevant planning history relating to the Site.

Proposals

As part of the library refurbishment works, two existing condensers which are not operating efficiently and have passed their serviceable life, are proposed to be removed and replaced with two energy efficient condensers within the lightwell. It is understood that the existing plant has been in place for c. 20 years.

Whilst the replacement condensers are to be located in the same location as the existing, they are smaller in size. Given their location in the lightwell area, they would not be visible from the street scene.

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.

For the purposes of the proposed development, the adopted Development Plan comprises:

- The London Plan (2021)
- Camden Local Plan (2017)

In terms of emerging policy, Camden are currently in the process of reviewing the Local Plan. The updated Local Plan is currently in the early stage of development and Camden consulted on the draft Local Plan (Regulation 18 consultation) between 17 January to 13 March 2024. The fully reviewed new Local Plan is expected to be adopted in the summer of 2026. Therefore, at this stage, in line with paragraph 48 of the NPPF, limited weight should be applied to policies within the draft Local Plan. They have, therefore, not been considered in detail in this letter.

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.

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 proposed new and replacement plant will be located discreetly, where they will incur limited or no visibility from the street scene. Furthermore, the proposed plant will be located in areas whereby there is already existing plant and servicing equipment, and will therefore be read alongside such existing equipment.

Overall, the proposals are considered to preserve the character and appearance of the Bloomsbury Conservation Area. Therefore, the proposal complies with Policies D1 and D2 of the Local Plan and is in accordance with the relevant sections 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 of 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 Venta Acoustics to assess the impact of the proposals at Gordon House on sensitive 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 30 dB at the nearest sensitive receiver, which is 23 dB below the background level. Therefore, the proposals are not expected to have adverse noise impacts.

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 CC6 (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 the library at Gordon House, the proposed plant will replace existing inefficient plant which provides cooling to this room. As the proposal relates to the 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 the more efficient units in association with the existing temperature-controlled rooms will improve the quality and function of these teaching space, which will benefit both staff and students at the University.

The proposed works will enhance the existing educational space and therefore the proposal 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 Bloomsbury Conservation Area. 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 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;
- Site Location Plan, prepared by Kendall Kingscott;
- Existing and Proposed Plans, prepared by Kendall Kingscott;
- Existing and Proposed Elevations, prepared by Kendall Kingscott;
- Supporting Photographs, prepared by Kendall Kingscott;
- Design and Access Statement, prepared by Gerald Eve; and
- Noise Impact Assessment, prepared by Venta 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 Paige Ireland [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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