

Regeneration and Planning  
Development Management  
London Borough of Camden  
5 Pancras Square  
Town Hall, Judd Street  
London  
WC1H 9JE

FAO: Edward Hodgson

**Our ref:** LEO/PIR/U0028970

**Your ref:** PP-13750816

**06 February 2025**

Dear Sir

**The Rayne Institute, 5 University Street, London, WC1E 6JF  
Application for Full Planning Permission**

On behalf of our client, University College London (UCL) (the 'Applicant'), we submit an application for full planning permission for replacement plant at the Rayne Institute, 5 University Street, London, WC1E 6JF (the 'Site').

Planning permission is sought for the following:

**"Removal of existing rooftop plant and the installation of heat pumps and associated equipment, and other associated works."**

**Site and Background**

The Rayne Institute is located on University Street, bordered by Mortimer Market to the south, Paramount Court to the north, Tottenham Court Road to the west and University College Hospital Macmillan Cancer Centre adjacent to the east. The building serves as an educational and research facility for UCL's Division of Medicine.

Although the Site is not statutory listed, it is situated within the Bloomsbury Conservation Area. The surrounding areas is predominantly occupied by educational buildings that form part of the UCL Bloomsbury Campus. The Grade II listed Cruciform Building is located to the northeast, as well as the Grade II listed University College Hospital Medical School Nurses Home Building to the east and the Grade II listed 70 and 46-68 Huntley Street to the southeast.

The Site also benefits from a Public Transport Accessibility Level of (PTAL) of 6b (excellent).

## 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 12 March 1992, an application for full planning permission (ref. 9101404) was granted for:

**"The installation of extractor duct at roof level as shown on drawings nos. 202 05 30B 31B 32A and 33C."**

On 13 April 1995, an application for full planning permission (ref. 9401342) was granted for the:

**"Installation of new fume cupboard extract ducts above roof level as shown on drawing numbers 202 05 34B 202 05 35B 202 05 36B and 202 05 37B revised by letters dated 13 January 1995 and 3 March 1995."**

On 14 December 1999, an application for full planning permission (ref. PS9905010) was granted for the:

**"Erection of a plant room at roof level on the Mortimer Market elevation, as shown by drawing numbers 1407/101 & 1407/102."**

On 07 June 2023, an application for full planning permission (ref. 2023/1449/P) was granted for the:

**"Removal of existing condensers, replacement with 4 new condensers at roof level, and associated works."**

As demonstrated by the relevant planning history set out above, several applications for full planning permission have been granted at the Site relating to the installation of plant and associated equipment.

## The Proposal

In order to support the function of the recently refurbished ground floor office space and meeting rooms, UCL is seeking to upgrade the existing cooling system, which is failing, with a more effective, sustainable and energy efficient system. The primary objective of the proposals is to ensure the comfortable and efficient use of the Rayne Institute for students and staff.

The proposed works involve the removal of the existing rooftop chiller unit, attenuator and galvanized roof cowls, and the installation of heat pumps, attenuator and roof cowls.

Although the replacement rooftop plant is larger in size than the equipment it will replace, it would not be significantly so. Furthermore, the plant would remain well set back from the roof edge and would be read in the context of other rooftop plant so to not appear visually obtrusive.

## 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) (2024);
- 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, which states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

## **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 involve the replacement of the existing cooling system with new heat pumps at roof level to serve the ground floor offices and meeting rooms.

The replacement plant would be slightly larger in size than the existing cooling unit that is being replaced, however, this size difference would not be noticeable. Additionally, the new unit would be read in line with a number of existing cooling units and associated equipment within this location. This context and the minor change in size would mean that the replacement plant would not be noticeable and would therefore have no adverse impact on the character and appearance of the conservation area.

Overall, the proposals are considered to preserve the character and appearance of the Bloomsbury Conservation Area. The proposal complies with Policies D1 and D2, and relevant statutory legislation.

### 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 Clear Acoustic Design, to evaluate the potential noise impact of the proposed plant. The assessment demonstrates that the proposals will adhere to the specific noise thresholds set by Camden Council, being 10dB below background noise levels during both daytime and night-time hours, with the attenuator in place.

The proposals are therefore in accordance with the Local Plan Policies A1 and A4.

## 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.'

Active cooling has historically existed within the building and therefore the proposals do not seek to introduce a new system. Rather the proposal simply seeks to replace and upgrade the existing system to ensure it is fit for purpose. An Overheating Assessment has therefore not been undertaken, as the proposal simply seeks to upgrade the existing system.

The proposals relate to the replacement of an existing cooling system. The existing system is not fit for purpose and the proposal simply seeks to upgrade this with a more effective, energy efficient system. Therefore, 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 introduction of a more efficient cooling system, within the existing temperature-controlled rooms will improve the quality and function of these spaces, 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.

## **Conclusion**

The proposal is for the removal of existing rooftop plant and the installation of heat pumps to provide upgraded active cooling to the ground floor of the building.

In conclusion, the proposed development complies with the relevant policies of Camden's Local Plan, namely Policies D1, D2, A1, A4 and CC2, and would preserve the character and appearance of the wider Bloomsbury Conservation Area.

The Noise Impact Assessment demonstrates that noise generated from the new plant would be within acceptable limits with the attenuator in place and, as such, would not result in any adverse 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 Newmark Gerald Eve LLP;
- Covering Letter, prepared by Newmark Gerald Eve LLP;
- Community Infrastructure Levy Form, prepared by Newmark Gerald Eve LLP;
- Design and Access Statement, prepared by Kendall Kingscott;
- Site Location Plan, prepared by Kendall Kingscott;
- Existing and Proposed Plans and Elevations, prepared by Kendall Kingscott; and
- Noise Impact Assessment, prepared by Clear Acoustic Design;

The requisite application fee of £578.00 (Plus a Planning Portal admin fee of £70.00) has been paid online via the Planning Portal at the time of submission.

Please do not hesitate to contact Paige Ireland (██████████) or Ben Gibbs (██████████) of this office should you have any questions or concerns. We look forward to receiving notice of your receipt and validation.

Yours faithfully,

*Newmark Gerald Eve LLP*

**Newmark Gerald Eve LLP**