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London Borough of Camden Planning and Borough Development 5 Pancras Square London N1C 4AG

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Our ref: PIR/ADKS/U0029575 Your Ref: PP-13932467

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UCL South Wing Building, Gower Street, London WC1E 6BT
Town and Country Planning Act 1990 (as amended)
Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)
Application for Full Planning Permission and Listed Building Consent

We write on behalf of our client, University College London ('UCL') (the 'Applicant') to submit an application for Full Planning Permission and Listed Building Consent for the replacement of the freestanding plant at UCL South Wing Building, Gower Street, London WC1E 6BT (the 'Site').

Planning Permission and Listed Building Consent is sought for the following:

"Removal of existing freestanding heat pump unit and replacement with new unit and associated works"

#### Site and Background

The South Wing forms part of the main UCL campus quadrangle and adjoins the Chadwick Building to the west and the Wilkins Building to the east. The quadrangle is listed as a single entry 'University College (University of London) and attached railings to north and south wing' and is Grade I Listed. A separate listing exists for the two observatories in the central courtyard, which are Grade II Listed. The Site is also located within the Bloomsbury Conservation Area.

As the building forms part of the main quadrangle, immediately surrounding uses are all educational.

The Site has a PTAL rating of 6b (the best rating) 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 30 November 2022, Listed Building Consent (ref. 2022/4032/L) was granted for "Proposed internal works to Room 23 of South Wing, relating to the removal of redundant servicing and the installation of an interactive screen, projectors, speakers, cameras and microphones, and associated servicing works".

On 12 September 2022, Planning Permission (ref. 2022/3276/P) and Listed Building Consent (ref. 2022/3370/L) was granted for the "Removal of 2 condensers in lightwell, replacement with a single condenser, and associated works".

On 8 September 2022, Listed building Consent (ref. 2022/2420/L) was granted for the "Installation of eight Wi-Fi access points at ground, first and second floor and removal of redundant fixtures and fittings at first floor".

On 17 January 2020 Listed Building Consent (ref. 2019/6085/L) was granted for the following "Installation of 2 x new AC units and 1 x replacement AC unit at roof level; and internal works associated with the creation of 2 new data and network cupboards (retrospective)".

On the 17 January 2020 Planning Permission (ref. 2019/5987/P) was granted for the "Installation of 2 x new AC units and 1 x replacement AC unit at roof level (retrospective)."

On the 2 July 2019 Listed Building Consent (2019/3141/L) was granted "Internal refurbishment works to improve the existing condition of roof G02 in the South Wing of the Wilkins Building".

On 11 April 2019, Listed Building Consent (ref. 2019/0271L) was granted for the "Refurbishment of rooms on Level 2 of South Wing and the refurbishment of an office and adjacent store on Level 1. Work includes alteration to an internal wall, and the removal of 2 no. 20th century suspended ceilings to reveal high level windows. New A/C to the teaching laboratories and mezzanine offices. External addition of a condenser unit, with the existing plant to the south-west rear corner of the building and associated services."

On 11 April 2019, Planning Permission (2018/6366/P) was granted for the "Installation of new A/C plant and condenser units and associated services to serve refurbished teaching laboratories and mezzanine offices of university building (D1)".

On the 1 February 2002, Listed Building Consent (ref LSX0104122) was granted for the "Removal of proprietary partition to 13A to make room for new mezzanine MG13".

On the 23 November 2001, Listed Building Consent (LSX0004950) was granted for the "Addition of five new mezzanines within existing ground floor area".

These applications demonstrate that there is a precedence for installing plant equipment at the Site.

## The Proposal

As part of the Print Room café refurbishment works, it is proposed to replace the existing freestanding external heat pump serving the space, which has surpassed its serviceable life, with a more efficient unit.



The proposed heat pump will be located in the same location as the existing and will be of similar proportions. In order to minimise the impact on the historic fabric, the new plant will be freestanding, and all pipework and cabling associated with the unit will follow the route of the existing redundant heat pump into the building via the external elevation.

Given the location of the proposed plant, within a designated discreet plant area on Malet Place, which is a semi private road, it would not be visible from any wider public views within the Bloomsbury Conservation Area.

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

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. Consultation on the Regulation 19 draft is currently underway and will end on the 27 June 2025. Due to the status of draft Local Plan at this stage, limited weight is given to the draft policies when assessing the proposals.

### **Statutory legislation**

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 to the statutory legislation below.

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 features of 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.

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 existing freestanding heat pump, which serves the Print Room café, is not operating efficiently. It is therefore proposed to replace the heat pump with a new, more efficient unit to ensure the continued successful function of the café. The proposed heat pump will be of the same proportions as the existing and will be sited in the same location, in an area that is designated for plant equipment. The replacement plant will therefore not result in any greater visual impact when compared to the existing situation.

Furthermore, the proposed plant equipment is located on Malet Place, which is a semi-private road used by UCL, accessible only to UCL staff and students. The plant would therefore not be visible from wider public views within the Bloomsbury Conservation Area.

To minimise the impact on the heritage asset, the proposed plant, as with the existing, will be floor mounted to avoid fixing to the historic fabric. In terms of the associated pipework and cabling, this will follow the route of the existing redundant pipework and cabling into the building via the external elevation. Given the nature of the works, there would be no impact on the significance on the listed building.

Overall, the proposal will have an acceptable impact and preserve the character and appearance of the Bloomsbury Conservation Area and will not harm the special architectural and historic significance of the listed building. The proposed works are therefore considered to be in accordance with the Local Plan Policy D1 and D2. The works would also meet the statutory test of the Planning (Listed Buildings and Conservation Areas) Act 1990.

### **Amenity**

Policy A1 (Managing the Impacts of Development) seeks to ensure that the amenity of communities, occupiers and neighbours is protected from new development. Policy A4 (Noise and Vibration) specifically requires that noise and vibration from plant or machinery is controlled and managed to minimise harm to amenity.

A noise assessment has been conducted by CLEAR Acoustic Design and is submitted in support of this application. This has found that noise emitted from the proposed plant will be at least 10dB below the existing background noise level, as evidenced in section 4 of their report. This is an acceptable outcome, in line with Camden Council's requirements and BS 4142: 2014 + A1: 2019 *Methods for Rating and Assessing Industrial and Commercial Sound*. Therefore, it is deemed that noise should not hinder the proposal outcome.

The development therefore complies with Policy A1 and A4 of the 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 CPG (2021) states that 'Active cooling will only be permitted where its need is demonstrated and steps in the colling hierarchy are followed.'

As part of internal refurbishment works, the proposed plant will replace existing inefficient plant which provides cooling. 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 to account the social and economic benefits they generate for Camden, London and the UK.

The installation of a more efficient unit will improve the quality and function of the Print Room Cafe, which will benefit both staff and students at the University.

The proposed works will enhance the function of this space and therefore the proposal complies with Local Plan Policy C2.

#### **Summary**

In conclusion, the proposed development, which comprises the replacement of plant, complies with the relevant policies of Camden's Local Plan, namely Policies D1, D2, A1, A4 and C2. 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 and would not harm the special architectural and historic significance of the listed building. Furthermore, the Noise Impact Assessment confirms that any noise generated by the plant would be within acceptable limits and would not result in any undue noise disturbance to any sensitive receptors.

The proposal therefore 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 (ref. PP-13932467), prepared by Newmark;
- Covering Letter, prepared by Newmark;
- CIL Form; prepared by Newmark;
- Site Location Plan, prepared by Kendall Kingscott;
- South Wing Building Existing Elevations, prepared by Kendall Kingscott;



- South Wing Building Proposed Elevations, prepared by Kendall Kingscott;
- Design and Access Statement, prepared by Kendall Kingscott; and
- Acoustic Report, prepared by CLEAR Acoustic Design.

The requisite application fee of £383 (inclusive of Planning Portal's admin fee) has been paid online via the Planning Portal at the time of submission.

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

Yours faithfully,

Newmark

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Paige Ireland Senior Planning Consultant

Encs. As above