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Dear Gavin,

UCL- 1-19 Torrington Place Plant Enclosure- Planning Application

On behalf of my client, University College London (UCL), I am pleased to enclose with this letter a planning application for the installation of a plant enclosure and emergency generator in the rear basement yard of 1-19 Torrington Place. This is required to enable the wider changes taking place in the sub-basement of 1-19 Torrington Place, where the existing car parking will be displaced with new essential data storage for the university. The planning application is for:

"Demolition of existing plant enclosure and sub-basement wall and installation of new plant enclosure, emergency generator, acoustic screening and cycle parking facilities in the rear basement yard at 1-19 Torrington Place."

The planning application has been submitted via the planning portal and includes the following documents:

- Planning Application, Certificate B and Agricultural Land Declaration;
- A plan identifying the land to which the application relates (at a scale of 1:1250);
- Existing and proposed drawings to describe the planning application;
- A Design and Access Statement, which illustrates the proposals in further detail;
- A Plant Noise Assessment; and
- A Transport Statement.

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The planning application fee of £385 has been paid via the planning portal.

Site Context

1-19 Torrington Place is located on the corner of Tottenham Court Road and Torrington Place. Queen's House (180-182 Tottenham Court Road) (Use Class B1) borders the Site to the west and 1-30 Gordon Mansions (Use Class C3) is located to the east. 178-179a Tottenham Court Road (Use Class B1 and D1) is located to the north of the yard. The Site is located within the Bloomsbury Conservation Area, but the rear yard has limited visibility from Torrington Place.

The rear yard is known to be at 'basement' level, but is in fact located above ground. It is located below 'street' level as there is ramp access from Torrington Place. The 'sub-basement' level of 1-19 Torrington Place is accessed from an existing ramp from the basement yard level.

1-19 Torrington Place was constructed in circa 1960 as a purpose built office building. Planning permission (2012/4608/P) was granted on 3 December 2012 for flexible use as offices (B1a) and educational use (D1) for a temporary period of 10 years. This consent allowed UCL to use the space flexibly to accommodate its changing demands.

Background to Proposals

UCL is London's leading multidisciplinary university, with over 11,000 staff and nearly 28,000 students. It was ranked fifth in the QS World University Rankings 2014/15 and provides excellence and leadership in teaching and research.

A large amount of infrastructure is required to facilitate the success and growth of the University and enable its world class teaching and research programmes. The provision of sufficient data storage is an essential requirement of the university.

UCL requires additional data storage space to secure sufficient long term capacity for the University. Any disruption caused to this critical infrastructure could cause immeasurable harm to the operation and day-to-day running of the university.

UCL has undertaken an extensive location search to assess all possible options for new storage. The exercise reviewed 12 possible locations and ranked each option based on the following key requirements:

- Proximity to UCL Bloomsbury Campus (needs to be within 1 mile);
- Availability;
- Size (8,000-12,000 sqft is required with minimum floor to soffit height of 4 metres);
- Power requirements; and
- Length of tenure (must have >20 years remaining).

The options appraisal confirmed that the sub-basement of 1-19 Torrington Place is the only suitable location for required new data storage space. UCL owns a long-leasehold interest in 1-19 Torrington Place with >90 years unexpired; there is sufficient floorspace and height available (if the car parking is removed from within the sub-basement of the building); there is sufficient power; and it is located in close proximity to the campus.

Plant machinery and an emergency generator are required in connection with the data storage. This is proposed to be located in the rear basement yard of 1-19 Torrington Place and is discussed below.

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Proposals

Data storage is proposed to be located within the sub-basement of 1-19 Torrington Place. The data storage is an essential component of the university use and is therefore ancillary to the main D1 Use Class. A change of use is therefore not required, which has been confirmed with LB Camden planning officers during pre-application discussions.

Plant machinery and an emergency generator are required to service the data storage. This machinery needs to be located externally to allow sufficient ventilation and therefore requires planning permission.

The design team has undertaken an options appraisal to assess the most suitable location for the plant and emergency generator. This reviewed options for locating plant on the roof of 1-19 Torrington Place (in different locations) and in the basement yard to the rear. Please see the Design and Access Statement, which supports the planning application for further details.

The options appraisal concluded that the external yard was the only suitable location for the following reasons:

- It requires the least amount of space (4 additional chillers required compared with 6 chillers for the rooftop options);
- External plant can be located immediately adjacent to the cooler enclosure;
- Locating chiller plant at basement level significantly reduces the requirement for service runs;
- Air cooled chillers have been identified to offer the lowest Power Usage Effectiveness for this project, leading to better energy efficiency (when compared against other options);
- Smallest visual impact as the rooftop options will be visible in long views from within the Conservation Area; and
- Acoustic mitigation can be provided to minimise any noise impact.

It is proposed to demolish and reconstruct the existing plant enclosure in the rear yard and also to demolish part of the sub-basement wall to accommodate the new enclosure and generator. The chillers are proposed to be 5.7 metres in height and the tallest part of the emergency generator will be 11 meters in height

The proposals will displace 40 car parking spaces in the sub-basement and 18 spaces in the rear basement yard (total of 58 spaces). There will therefore be far fewer vehicles accessing the rear yard and sub-basement. Additional and enhanced cycle parking facilities will be provided to offset the loss of car parking and to encourage UCL staff to use more sustainable modes of transport.

Planning Considerations

Policy DP28 states that the Council will only grant permission for plant or machinery if it can be operated without causing harm to amenity and does not exceed the Camden noise thresholds. Policy DP26 also resists development that will cause harmful effects on the amenity of occupiers and nearby properties. This includes visual outlook, noise and vibration. The proposal's impact on amenity and noise are discussed in turn below.

Amenity Impact

Plant machinery and an emergency generator are proposed within the rear yard of 1-19 Torrington Place. The Site is located in the Bloomsbury Conservation Area but the proposals are located in a private back-

of-house servicing yard, which has limited visibility from the public highway. As indicated in the Design and Access Statement, locating the plant machinery on the roof of 1-19 Torrington Place would have a far greater visual impact and would be visible in longer views within the Conservation Area.

The plant enclosure and generator will be most visible from above. The yard is overlooked by some commercial properties on Tottenham Court Road. No residential windows directly overlook the Site, but a small number of properties in Gordon Mansions face onto the lightwell and will partially overlook the yard. The Gordon Mansion properties are located approximately 35m from the plant enclosure.

The generator is located closest to the Gordon Mansion residents and will obscure views of the chiller enclosure behind. Appropriate visual screening has been provided to minimise visual impact. The roof structure of the generator has been designed to be sympathetic and includes a brown roof to enhance its appearance and increase biodiversity.

The existing outlook onto the basement yard is of a service yard, car parking and the existing plant enclosure. As the proposed new plant enclosure is larger than the existing, it will take up more of the yard and there will be less car parking visible. The general outlook will remain similar to the existing in terms of the type of uses and buildings.

The proposed emergency generator is in close proximity to the commercial building to the rear. Many windows in this building are currently blocked up and are used by the gym and for commercial use. There will be no significant amenity impact on this building.

Noise

Residential accommodation is located within the Gordon Mansion properties to the east of the Site. The Camden noise thresholds (Table E of Policy DP28) state that noise levels should be a least 5dB below the lowest recorded day, evening and night-time background levels.

An acoustic consultant was appointed at an early stage to help inform the emerging design of the plant enclosure. Two unattended and one attended background noise readings have been undertaken to ensure the existing background noise level is accurate. The report has also given consideration to a previous noise survey undertaken in 2013 (for a separate planning application), which was lower than the three readings undertaken for this planning application. An existing background noise reading of 45dB L_{Aeq} has therefore been suggested, which is much lower than would be expected for a 'Central London Area' designated site.

A detailed Noise Impact Assessment has been prepared to support the planning application. This has informed the design of the acoustic enclosure for the chiller units, which is required to provide attenuation of at least 16dB. The report concludes that the proposals will meet LB Camden's noise thresholds and are in accordance with Policy DP28.

The emergency generator is located closest to the residential properties. This will only be operational in the unlikely event that there is a power outage or temporarily during essential testing as set out below:

- 2 hours/ month for testing.
- 8 hours/ year for maintenance.

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Outside of these infrequent instances, the generator will not be in use and will have a negligible noise impact. The timing of the testing and maintenance will be carefully considered to ensure there is minimal impact on any surrounding properties and the applicant expects this can be confirmed via condition.

This application is connected to wider proposals for the change in operation and intensity of use in the yard and sub-basement. 58 car parking spaces will be displaced and the Transport Statement suggests there will be approximately a 77% reduction in vehicle movements/day for deliveries. The nature of the space will therefore change. The development will result in a quieter and less disruptive space with far fewer vehicles accessing the yard and sub-basement. This will significantly reduce peak noise levels and also any disturbance associated with the movement, loading and unloading of vehicles and any impacts on the Gordon Mansion residents.

Car Parking Provision

The proposals include the loss of 58 car parking spaces. Camden Policy DP18 seeks to ensure that developments provide the minimum necessary car parking provision. The supporting text (para 19.14) to Policy DP19 also states that:

"*in order to promote more sustainable modes of travel, the Council generally welcomes proposals to reduce the amount of off-street parking in the borough, provided that the removal of spaces would not:*

- *lead to a shortfall against minimum parking standards relating to bicycles, people with disabilities, service vehicles, coaches and taxis;*
- *cause difficulties for existing users, particularly if the spaces are used by shoppers, by nearby residents, or for the operational needs of a business; or*
- *displace parking to controlled parking zones, particularly in identified areas of parking stress."*

The existing car parking spaces are used by UCL staff and deliveries. Up until recently, UCL staff could apply for an annual parking permit for an allocated space. However, UCL encourages staff to use sustainable modes of transport and is seeking to minimise private car use (and reduce car parking) across the Bloomsbury Campus. Therefore, this loss of parking is consistent with its wider policy. The proposals include enhanced cycle parking facilities and an increase of 18 cycle parking spaces in the rear basement yard. It is therefore considered the loss of car parking is acceptable and will allow UCL to encourage staff to use more sustainable modes of transport. This is outlined in further detail in the supporting Transport Statement.

Basement access ramp

An external deck is proposed to mount the plant machinery (please see the Design and Access Statement). The private access ramp will be reduced in width (from approximately 5.2m to 2.6m). As suggested above, all the sub-basement car parking spaces are being displaced and the access route is only required for infrequent maintenance vehicles. A swept path analysis has been undertaken to confirm that the revised road layout can easily allow a small van to access the sub-basement.

Summary

This planning application seeks consent for an external plant enclosure and emergency generator in connection with new data storage space being provided in the sub-basement of 1-19 Torrington Place. A summary of the proposals is outlined below.

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- The plant machinery is proposed in the most suitable location and has been designed to be as small as possible.
- The proposal seeks to re-construct the existing plant enclosure and provide a consolidated long-term solution.
- The enclosure and emergency generator will be most visible from above. The generator has been designed to have a minimal visual impact and includes a brown roof to enhance its appearance and increase biodiversity.
- Two unmanned and one manned background noise readings have been undertaken. The acoustic consultant has considered all three readings and a 2013 noise survey to set an accurate background noise level. The plant machinery has been designed to meet the LB Camden Noise Thresholds and is in accordance with Policy DP28.
- The proposals include the loss of 58 car parking spaces and provide enhanced cycle facilities with 18 additional spaces and are therefore in accordance with Policy DP19. It is expected that there will be a 77% reduction in vehicle movements/day for deliveries in the rear yard.

The data storage and associated plant machinery is essential infrastructure to enable the day to day running of the university. The Site is located in a back-of-house service yard and the proposals have been designed to be as sympathetic as possible to the local context.

For the reasons set out in this letter, we consider that this application is in accordance with planning policy and that planning consent should be granted.

If you have any questions in relation to the submission, please do not hesitate to get in touch.

Yours faithfully

Leonie Oliva

Leonie Oliva
For Deloitte LLP