20 August 2015

Development Management
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Our reference: I-nm-cl-210715
Planning Portal reference: PP-04347277

Dear Sir

APPLICATION FOR PLANNING PERMISSION
TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
WELLCOME COLLECTION, 183 EUSTON ROAD, LONDON, NW1 2BE

We are instructed by Wellcome Trust, to submit a detailed application for the removal and replacement of 3 no. roof mounted chillers at the Wellcome Collection, 183 Euston Road.

The application has been submitted via the Planning Porta (Ref: PP-04347277) and comprises the following:

- This cover letter
- Completed planning application form and certificate A
- Payment of £385.00 as the statutory application fee
- Noise Report, September 2014 (Buro Happold)
- Desktop Review, July 2015 (Hilson Moran)
- Specification Sheets
- Drawings as follows:

Drawing No.	Drawing Title	Scale and Size
001	Site Location Plan	1:1250 @ A4
20089/SK/03	Existing Chiller Layout	1:100 @ A1
20089/SK/04	Proposed Chiller Layout	1:100 @ A1
20089/SK/01	Existing Chillers Elevation	1:100 @ A1
20089/SK/02	Proposed Chillers Elevation	1:100 @ A1
L025_A_G200_SK_01	Proposed Plans, Sightline Section	1:500 @ A3

Backgound

The Wellcome Trust is a global charitable foundation dedicated to improving health, and supporting bright minds in science, the humanities and the social sciences, as well as education, public engagement and the application of research to medicine.

Wellcome Trust activities are extensive and include a grant funding process, as well as in-house activities to support grant funding. There is a major international library, a division dedicated to the promotion of science, a policy research unit, as well as departments dealing with human resources, finance, information technology, facilities and investments.

Wellcome Collection is a free visitor destination. Located at 183 Euston Road, London, it explores the connections between medicine, life and art in the past, present and future. The venue offers contemporary and historic exhibitions and collections, lively public events, the world-renowned Wellcome Library, a café, restaurant, bookshop and conference facilities.

Application Proposal

Planning permission is sought for the *'removal of 3 no. existing roof mounted chillers and replacement with 3 no. roof mounted chillers' at 183 Euston Road.*

The three new Airedale air cooled chillers (model TCC12R1OS-04) will replace the three existing Trane (model RTAC 170 HE LN) air cooled chillers.

The dimensions of the existing chillers are 5960(L) x 2260(W) x 2411(H) and the dimension of the proposed chillers are 6022(L) x 2200(W) x 2800(H).

The new chillers will serve the same duty as the three existing Trane chillers, and will be located within the same general locations as the existing. The plant will be in 24-hour operation as existing.

Planning Context

Planning law requires that where regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise[1]. In assessing and determining development proposals, the National Planning Policy Framework (March 2012) states that local planning authorities should apply a presumption in favour of sustainable development. Where development proposals accord with up-to-date development plan policies they should be approved without delay.

The development plan for Camden Council consists of the London Plan (March 2015), Camden Core Strategy (November 2010) and Camden Development Policies 2010-2025 (November 2010).

The property ('site' above) is designated as being within the Central London Area and the Bloomsbury Conservation Area.

The building is situated within the Bloomsbury Conservation Area. Camden's Local Development Framework sets out the objectives to preserve and/or enhance the special interest of Bloomsbury Conservation Area. Core Strategy Policy CS14 seeks to promote high quality places and looks to conserve Camden's heritage assets and their settings, including conservation areas. Further, Development Policy DP25 seeks to maintain the character of Camden's conservation areas. It sets out that development within a conservation area that seeks to preserve and enhance the character and appearance of the area will be permitted.

The Bloomsbury Conservation Area Appraisal and Management strategy (2011) sets out that the buildings along Euston Road, which are situated within the Conservation Area are generally four to five storeys in height. The Wellcome Institute on the south side along with *"Nos.194-200 Euston Road and Nos.1-9 Melton Street (Listed Grade II) form a group of classically-styled Portland stone buildings that signal the transition into the Conservation Area along Euston Road travelling east."*

Development Policy DP28 considers noise and vibration. The Council will seek to ensure that noise and vibration is controlled and managed. The Council will grant permission for plant or machinery if it is operated without any harm to amenity and does not exceed the noise thresholds as set out below:

[1] Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990

Noise description and location of measurement	Period	Time	Noise level
Noise at 1 metre external to a sensitive façade	Day, evening and night	0000-2400	5dB(A) <LA90
Noise that has a distinguishable discrete continuous note (whine, hiss, screech, hum) at 1 metre external to a sensitive façade.	Day, evening and night	0000-2400	10dB(A) <LA90
Noise that has distinct impulses (bangs, clicks, clatters, thumps) at 1 metre external to a sensitive façade.	Day, evening and night	0000-2400	10dB(A) <LA90
Noise at 1 metre external to sensitive façade where LA90>60dB	Day, evening and night	0000-2400	55dB$L_{Aeq'}$

Figure 2: Extract from Camden Development Policies Document (Development Policy DP28)

There is an extensive planning history for the building, which dates from 1931 however the planning applications of particular relevance to the proposed development are as follows:

1. Planning permission was granted on 19 July 2013 for *"alterations and extensions including creation of two new entrances on the front elevation, partial infill of lightwells, rooftop plant to comprise 3 air handling units, kitchen extract and 6 condenser units and associated works in association with decrease in office floorspace (Class B1) and increase in exhibition floorspace (Class D1)"*, (application ref: 2013/1286/P).

2. A minor-material amendment application was approved on 1 May 2015 for "*variation of condition 3 of planning permission 2013/1286/P dated 19/07/2013 {for alterations and extensions including creation of two new entrances on the front elevation, partial infill of lightwells, rooftop plant to comprise 3 air handling units, kitchen extract and 6 condenser units and associated works in association with decrease in office floorspace (Class B1) and increase in exhibition floorspace (Class D1)} namely reconfiguration of plant at roof level"*, (application ref:2014/6501/P).

   An updated Planning and Noise Report (dated 1 September 2014) was submitted in support of this application and superseded the Planning and Noise report detailed under Condition 2 of permission 2013/1286/P.

Planning Assessment

The principle of the plant on the roof of the building has already been established on the site (as set out in the planning history), with a significant level of the plant already being located on the roof to support the existing uses within the building. The proposal therefore does not raise any issues with respect of the principle of use and is considered to be acceptable as it supports the effective and efficient use of the building.

Whilst the building is located within the Bloomsbury Conservation Area, the proposed chiller units will be located on the roof level amongst existing plant and be set back from the parapet edge. There will not be any material impact on views to the roof from neighboring buildings and will not be visible from Euston Road (see Drawing No. L025_A_G200_SK_01). On this basis, the proposal will not impact on the character and appearance of the conservation area. In addition, the proposal will result in no harm to the Wellcome Collection building as a non-designated heritage asset. The proposal therefore meets the objectives of Camden's Development Policy DP25 (Conserving Camden's Heritage), Camden's Core Strategy Policy CS14 (Promoting High Quality Places and Conserving our heritage) and Policy 7.8 (Heritage Assets and Archaeology) of the London Plan (July 2011).

The new Noise Report was submitted with the minor-material planning application (app ref: 2014/6501/P) for roof plant and provided an assessment of the background noise levels and existing plant noise levels. The roof plant (including the 3 existing units to be replaced in this application) complied with the noise requirements of Camden's Development Policy DP28. Hilson Moran Acoustics have undertaken a review of this existing noise report and, using the details provided, assessed the new chilllers against the background levels identified in the

Noise Report. The Noise Report (September 2014) has also been submitted as part of this application to provide details of the background noise levels for the assessment of the new chillers.

The review by Hilson Moran Acoustics sets out that the proposed chillers (Model TCC12R10S-04) have a sound pressure level of 57dBA when measured at a distance of 10 metres from the long side of the chiller (which equates to approximately 67dBA at 1 metre). In comparison, the existing chiller units to be replaced had a sound pressure level of 74dBA at 1 metre. Therefore the review confirms that, as the existing units complied with the relevant noise criteria, the proposed units being 7dBA quieter will continue to comply with Camden's Development Policy DP28 (Noise and Vibration).

In addition to the reductions in noise identified above, the replacement of the plant has a number of other benefits. The proposed Airedale chillers have a better Energy Efficiency Ratio (EER) and European seasonal Energy Efficiency Ratio (ESEER) and would therefore, result in a reduced energy consumption and electrical utility costs by comparison to the chillers currently installed. The new Airedale chillers will also provide improved plant reliability and significantly reduce the risk of a potential plant failure. The compressors installed in the proposed chillers require less maintenance than the existing units.

The table below provides a comparison of the existing and proposed chillers for information:

Manufacturer	Existing chiller	Airedale
Model	RTAC 170 HE LN	TCC12R10S-04
No of Chillers	3	3
Design External Ambient Temperature	32˚C	35˚C
Noise Sound Pressure (dB)	60	57
Electrical – Max Amps	454	409
EER	3.06	3.44
ESEER	3.78	5.32

Figure 3: Comparison Table (source: Hilson, Moran, 2015)

Based on our assessment above, we consider that the proposal accords with the development plan and, as such, request that the Council determine the application favorably in accordance with NPPF paragraph 14.

We trust you have all the necessary information to register, validate and determine this application. However, please contact Emma Andrews or myself should you have any queries.

Yours faithfully

Nicola Miller
For and on behalf of Porta Planning LLP