

Planning Department
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall, Judd Street
London
WC1H 9JE

FAO Antonia Powell

03 July 2017

Dear Ms Powell,

UCL: BENTHAM HOUSE AND GIDEON SCHREIER WING, WC1H 0EG APPLICATION FOR PLANNING AND LISTED BUILDING CONSENT

On behalf of our client, University College London (UCL) (the 'Applicant'), we hereby submit to the London Borough of Camden an application for Planning and Listed Building Consent for the installation of new plant equipment on the roof of Bentham House. The proposals are for roof mounted ventilation and cooling equipment and an associated acoustic screen. The description of development is:

"Installation of new roof mounted plant equipment and related acoustic screen"

Background

UCL is London's leading multidisciplinary university, with over 11,000 staff and nearly 40,000 students. It was ranked seventh in the QS World University Rankings 2016/17 and provides excellence and leadership in teaching and research.

The University is embarking on an ambitious programme of renovation and redevelopment across its sites. The Faculty of Laws, which occupies both Bentham House and the adjacent Gideon Schreier Wing, has formed part of these ongoing efforts to improve the offering to students. Both buildings have been subject to a number of planning and listed building consent applications in recent years, with a 2014 consent providing for a new extension, refurbishment and modernisation works.

Planning and Listed Building Consent is now sought for new roof mounted ventilation and cooling equipment and an associated acoustic enclosure. The proposals represent the continuing efforts to refurbish the building to ensure that a high quality environment is delivered for the future users of the building, including students and staff as well as visiting lecturers. The main refurbishment works are currently being implemented (please refer to the planning history section below for details of the relevant consents).

The Laws Faculty is accommodated within both Bentham House and the Gideon Schreier Wing. It is an intellectually dynamic and diverse community of world-class scholars. It is one of the foremost Laws faculties in the world and has an excellent international reputation, despite a continued lack of investment in its estate.

In order to maintain its standing as a world-class teaching institution, the Faculty of Laws must compete with other law schools internationally and be able to attract the highest calibre of staff and students. The existing buildings do not provide the accommodation that the Faculty needs in order to do this.

Therefore the key objectives for the Faculty of Laws is to secure more and better quality teaching and academic accommodation to meet its current and future requirements, as well as ensure its competitiveness.

The Faculty has grown since it first moved into Bentham House. The consented scheme (2014/5034/P) and the proposals both help to significantly improve the office and workspaces offered to students and importantly scholars, at Bentham House and the Gideon Schreier Wing.

In 2016, a Planning and Listed Building Consent was submitted and approved which brought the fifth floor of Bentham House into scope in response to increasing staff and student demands for high quality working spaces. This application for new plant will ensure that the new areas provided on the first floor as a result of the 2016 application will provide the quality of working spaces that is expected. Furthermore, as the fifth floor location in the building makes it susceptible to high temperatures, the ability to better control the climate on the floor through enhanced ventilation is greatly needed.

Site Location and Description

The application site is on the eastern side of the UCL Bloomsbury Campus, and is located on the corner of Endsleigh Gardens and Endsleigh Street. The surrounding area is characterised by a mix of uses in line with its Central London Location, including student residences (sui generis Use Class) on Endsleigh Street, the Hilton Euston hotel (Use Class C1) to the rear of the site, offices (Use Class B1) and various buildings in higher education use (Use Class D1).

The site is located within the Bloomsbury Conservation Area (Sub-area 2: 'Gordon Square/Woburn Square/Byng Place'). Bentham House is Grade II listed (List no. 1417858). In close proximity are a number of listed buildings, including the 'Cora Hotel' (now Hilton Euston) (Grade II) 30m to the east, and numbers 3-6 Endsleigh Street (Grade II) 15m to the south east.

Planning History

Both Bentham House and the adjacent Gideon Schreier Wing were granted Planning and Listed Building Consent in 2014 for their extension, refurbishment and modernisation. Following this, a Listed Building Consent for the refurbishment of the fifth floor was approved in 2016.

Details of these applications, and others of relevance to the current application proposals are set out below.

Application Reference	Address	Description	Status
2016/3298/P	Bentham House, 4-8 Endsleigh Gardens	Installation of rooflight and 2 air vents at roof level.	Granted (August 2016)
2016/3807/L	Bentham House, 4-8 Endsleigh Gardens	Internal alterations including removal of partitions at 5th floor and installation of insulation, the addition of partitions at 1st to 4th floor and re-wiring throughout, and the installation of rooflight and 2 air vents at roof level.	Granted (August 2016)
2016/2131/P	Gideon Schreier Wing, 1-2 Endsleigh Street	Replacement of 3 x existing windows with 1 large window with sliding glazed doors at roof level.	Granted (July 2016)

Application Reference	Address	Description	Status
2014/5034/P	Bentham House, 4-8 Endsleigh Gardens & Gideon Schreier Wing, 1-2 Endsleigh Street	Enlargement and external alterations, including recladding and the addition of one storey to the Gideon Schreier wing, new five storey rear extension and associated provision of external cycle parking and landscaping, following substantial demolition of Gideon Schreier Wing; all in association with the refurbishment of the existing university building (Use Class D1).	Granted (December 2014)
2014/5044/L	Bentham House, 4-8 Endsleigh Gardens	External and internal alterations to Bentham House including re-organisation of ground floor reception and circulation spaces, alterations to existing windows to create a new entrance lobby and link to new rear extension and associated works; all in association with the refurbishment of the existing university building.	Granted (November 2014)

Proposed Development

The proposals are for roof mounted ventilation and cooling equipment, and an associated acoustic enclosure.

A new roof mounted air handling unit proposed at the east end of the Gideon Schreier Wing building. This will replace two internal ventilation units, which are now insufficient due to the increased internal occupancy permitted by last year's consents. Removing these internal ventilation units also enables the removal of two external grilles on the rear of the building, and allows a further two grilles to be replaced with glazing on the south east elevation.

On the roof of the Gideon Schreier Wing, there are three smaller plant units proposed. In addition to this, further south on the Gideon Schreier Wing building roof, is a further condenser unit.

On the roof between Bentham House and the Gideon Schreier Wing is an Automatic Opening Vent (AOV), for smoke clearance, which will replace three existing vents.

There are several changes along the main roof of Bentham House. Planning and Listed Building Consent has been granted for two cowls on the roof. However, now proposed are ventilation units and a short length of external ductwork on the north east end of the roof. It is also proposed that a new cowl is added to an existing flue on the eastern end of the roof.

On the north west end is a rooflight, for which permission was granted last year, which will no longer be needed. A simple cowl is proposed in its place.

The majority of these proposals comprise minor alterations and installations which will largely be concealed behind existing parapets and not visible from street level.

On the tower at the east end of the Bentham House roof are plant units proposed within an acoustic screen. The acoustic screen is required due to the proximity to the Hilton Euston Hotel and to ensure an acceptable level of amenity for the guests of the adjacent hotel. The design has been carefully considered with regards to visual and amenity impact. The factors that influenced the design of the plant are set out in more detail later in this letter within the planning considerations section.

Please refer to the submitted Design and Access Statement for a more detailed description of the proposals.

Pre-application Discussions

Pre-application discussions have been held onsite with the Council's Conservation and Design Officer on two separate occasions. On 23 November 2016, the initial concepts and proposals were discussed. At this time, it was clear that the emerging proposals for new plant would be visible from ground level.

Since then the proposals have been further developed and the requirements for servicing have been fine-tuned. This has resulted in an increased number of units needed to provide an acceptable level of climate control and to meet user requirements. Since the initial meeting, a noise consultant has also been appointed to carry out the appropriate noise surveys in relation to the proposals. The noise survey demonstrated that an acoustic enclosure was needed to mitigate noise emissions from some of the units to ensure that the proposals maintained an acceptable level of amenity in line with Camden's policy requirements.

Revised proposals, including the additional units and acoustic enclosure, were discussed with the officer on site on 29 March 2017. Some concerns were raised regarding the height of the acoustic screen, as well as its proximity to the rear parapet. Since these discussions, the design has been revised in order to account for these comments with the plant moved towards the centre of the tower, and the heights reduced. Further details of these revisions are included in the Planning Policy Considerations section of this letter.

The Development Plan

The Development Plan comprises the London Plan (2016), the Camden Core Strategy (2012), and the Camden Development Management Policies (2010). Although not yet adopted, the recently submitted draft Camden Local Plan (2016) is also a material consideration, along with the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).

The following policy designations apply to the site:

- Bloomsbury Conservation Area (Policy CS14);
- Central London Area (Policy CS3); and,
- Designated View - 4A.1 Primrose Hill summit to St Paul's Cathedral - Right Lateral Assessment Area.

The main planning considerations in relation to this application are summarised below.

Planning Policy Considerations

Design and Conservation

The relevant design and conservation policies are as follows:

Policy CS14: Promoting high quality places and conserving our heritage – *this outlines the need to ensure development is of a high quality design which subsequently respects the local context and character. In recognition of Camden's 'rich and diverse heritage assets and their settings', the policy also explains that the Council will seek to preserve these assets, with particular attention given to listed buildings and conservation areas.*

Policy DP25: Conserving Camden's heritage – *this policy again seeks to ensure that development proposals meet the highest standards of design, respect local context and character, and resist development that would cause harm to any listed building or Conservation Area.*

Policy DP26: Managing the Impact of Development on Occupiers and Neighbours – *this policy strongly resists development that will be harmful to the amenity of occupiers and nearby properties. When assessing proposals against this policy, the Council will consider a range of factors, including visual privacy and overlooking, overshadowing and outlook, and noise and vibration levels. In relation to these factors, the policy explains that the Council will also consider the inclusion of appropriate attenuation measures.*

Policy D2: Heritage (draft Local Plan) - *this policy maintains the need to protect Camden's heritage assets. It also recognises the need to consider the relative weight of public benefits when assessing development proposals which results in substantial harm to listed buildings. It is also emphasised that the council will resist any alterations or extensions which would cause harm to the special architectural and historic interest of a listed building.*

Applicant Response

Most of the units will not be visible from ground level concealed behind the existing parapet and low upstand on the roof edge. This is demonstrated in the drawings by the sightlines which have been included with the application. Therefore the impact on the character of the Conservation Area and views within a Conservation Area is minimised.

Furthermore, the proposals include substituting two existing internal ventilation units with one new unit located on the roof the building, which will again be concealed by the parapet. This enables the removal of two external grilles on the rear, and also for two external grilles on the south east, public elevation to be replaced with glazing. It is considered that this constitutes an improvement over the existing arrangement of grills that will improve the design of the elevation and impact from street level. Arguably, improving the building's contribution to the character of the Conservation Area.

At pre-application stage the height of the acoustic enclosure on the north east end of Bentham House which is required due to the proximity to the adjacent Grade II listed Hilton Euston hotel was discussed and concerns were raised by the officer with regard to its height. Whilst the acoustic screening will help mitigate the impact of development on occupiers and neighbours as required by Policy DP26, it would be visible from ground level. In response to this concern, the unit has undergone several design revisions. This includes moving the plant units as close as possible to the centre of the tower, in order to reduce the impact to pavement level sightlines over the parapets. In addition to centralising the units, acoustic analysis has enabled the height of the acoustic screening enclosure to be lowered. Previously, the acoustic screen was shown at approximately 3.0 metres, it is now proposed to be a height of 2.2 metres.

The design process has responded to the officer's concerns and has sought to reduce the visual impact of the proposals. The reduced height of the acoustic enclosure and careful positioning of the plant units on the roof minimises the impact of the proposals on the character of the Conservation Area, and the listed building itself. The acoustic screening will additionally serve to visually screen the plant from the hotel. It is considered that the revised proposals respect the local context.

In recognition of Policy D2 of the draft Local Plan, attention should too be given to the public benefit of the proposals. The proposals support ongoing refurbishment work at Bentham House which is designed to provide high quality teaching and learning spaces for staff and students. The proposals support the 2016 consents which sought to bring forward the refurbishment of the fifth floor of Bentham House, therefore optimising the use of the building.

Noise

The relevant noise policies are considered below.

Policy DP28: Noise and Vibration *states that the Council will seek to ensure that noise and vibration is controlled and managed, and that they will not permit development which exceeds the council's own Noise and Vibration*

thresholds. The policy also explains 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 Camden's noise thresholds."

Policy A4: Noise and vibration – *this policy sets out Camden's aims to ensure that noise and vibration is controlled and managed, and states that they will not grant planning permission for development likely to generate unacceptable noise and vibration impacts.*

Applicant Response

Attention has been given to the proximity of neighbouring buildings and occupiers, particularly the Hilton Euston hotel located to the east of the application site, with regard to the noise implications of the proposals. The Hilton Hotel represents the nearest noise-sensitive occupier. As previously mentioned, acoustic screening is required to enclose the plant proposed to be located nearest to this hotel. The acoustic screening is to be installed to ensure the noise impact of these units is brought down to a level acceptable given their proposed location.

The Noise Report submitted with the application includes details of each of the proposed installations, as well as the noise impact these are likely to have. It is also concluded that these new units, along measures including the acoustic screening, are expected to comply with all of the relevant noise limits. It is therefore also possible to conclude that the proposals will not cause harm to the neighbouring amenity, as set out in Camden policy requirements.

Please refer to the Noise Report submitted in support of this application for further information.

Application Submission

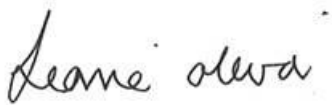
In addition to this covering letter and policy assessment, this application comprises and is supported by the following documents:

- Application Forms and Certificates (prepared by Deloitte);
- Noise Report (prepared by Sandy Brown);
- Site Location Plan (prepared by Levitt Bernstein);
- Design and Access Statement (prepared by Levitt Bernstein); and
- Existing and proposed drawings (prepared by Levitt Bernstein):
 - Existing:
 - 3000_L_056_P8
 - 3000_L_146_P5
 - 3000_L_147_P9
 - 3000_L_148_P8
 - 3000_L_149_P6
 - 3000_L_150_P6
 - 3000_L_151_P7
 - 3000_L_152_P9
 - 3000_L_154_P8
 - Proposed:
 - 3000_L_106_P24
 - 3000_L_196_P11
 - 3000_L_197_P21
 - 3000_L_198_P18
 - 3000_L_199_P15
 - 3000_L_200_P17
 - 3000_L_201_P20
 - 3000_L_202_P20
 - 3000_L_204_P16.

The application fee of £770.00 will be paid via cheque under separate cover.

We trust that you have all the information you need to validate the application. Should you have any queries or require any further information, then please do not hesitate to contact my colleague Phil Wright (020 7303 6106 / phiwright@deloitte.co.uk).

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Leonie Oliva', with a small dot above the 'i' in 'Oliva'.

Leonie Oliva
Deloitte LLP

ENCS.

CC. C Shore (UCL)