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Planning Department
London Borough of Camden
2nd Floor, 5 Pancras Square
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Your ref: PP-08372371

Dear Sir, Madam,

University College London – Rockefeller Building, London, WC1E 6DE

Application for Planning and Listed Building Consent for the Erection of an Air Plant Enclosure

On behalf of our Client, University College London ('UCL') ('the applicant'), we hereby submit to the London Borough of Camden ('LB Camden') a full planning application and a listed building consent application for the erection of an air plant enclosure and a solid acoustic screening at the roof of the Rockefeller Building ('the Site'). The description of development is:

"Erection of an air plant enclosure on the roof and a solid acoustic screening of 2.05m and associated works at the edge of the roof of the Rockefeller Building."

Site Location and Description

The application site is located to the north-east of the Wilkins Building and forms part of the UCL Bloomsbury Campus. The site is bound by the Cruciform Building to the north, the Arthur Tattersall House to the south, the Grant Museum of Zoology to the east and the UCL Anatomy Building to the west. The area is characterised by a mix of uses in line with its Central London location. In the immediate vicinity of the site, the area is characterised by buildings in D1 use reflecting its location at the core of UCL's Bloomsbury Campus. Other nearby uses include University College Hospital and Euston Square Underground Station. The Rockefeller Building is occupied by the UCL Medical School (Use Class D1).

The Rockefeller Building is Grade II listed (list entry: 1113060). In addition, there are a number of designated heritage assets in close proximity to the site including Grade I-listed Wilkins Building (list entry number: 1113056), Grade II-listed Kathleen Lonsdale Building (list entry: 1322168) and Grade II-listed Cruciform Building (list entry: 1113056). It is located in the Bloomsbury Conservation Area, within Sub Area 3, 'London University/British Museum.'

The application site is 6 storeys high and was designed by Paul Waterhouse. The principle elevations to Gower Street, University Street and Huntley Street are in a bold Edwardian Baroque style, making a significant impact on the streetscape. There are a number of modern plant units installed on the roof to support the Medical School, mostly from 1980s onwards and are not visible from street level.

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This application relates to the roof of the Rockefeller Building only. The works are contained within the proposed air plant enclosure (please refer to architectural drawing number 789_PL_001).

Context to the Application

The relocation of the Eastman Dental Institute into the Rockefeller Building has allowed the institute to improve its service delivery and invest in cutting edge research and teaching equipment. Funds have been made available to upgrade the specification of the clinical teaching equipment and create a world leading teaching and examination facility. This upgrade of equipment requires an increase in the volume of compressed air plant required to support the apparatus and increased use of the facility. This will allow continuation of the UCL Medical School's world class reputation.

Relevant Planning History

The table below sets out the relevant planning history of the site. The applications primarily relate to the erection of external structures on the roof to accommodate the Medical School and minor external and internal alterations.

Application Reference No.	Application Description	Status
2019/5511/L	Details of new service runs, suspended ceilings and new joinery as required by parts a, b and c of condition 5 of listed building consent 2018/4243/L (dated 17th Dec 2018).	Pending Determination
2019/4152/P	Details of rooftop and rear deck plant equipment and associated mitigation measures as required by condition 4 of planning permission 2018/4242/P (dated 17/12/2018).	Approved – November 2019
2019/1554/L	Details/method statement for fire safety upgrades to doors and associated joinery and cupboards and a method statement for the salvage, retention and re-use or disposal of historic joinery and fireplaces to the fourth floors, as required by conditions 5(d) and 6 respectively of listed building consent ref 2018/4243/L dated 17th Dec 2018.	Approved – May 2019
2018/4242/P	Erection of plant equipment at roof level and within rear courtyard on an external multi-storey deck; replacement of metal fire escape stairwell to the rear lightwell.	Approved – December 2018
2014/3337/L	Minor internal alterations to 2nd and 3rd floor room numbers: 222-224, 226-227, 302, 304, 313, 320, 323, replacement of window with access door at 2nd floor level and associated building services plant on roof of second, fifth and sixth floor.	Approved – May 2014
2014/0898/P	Replacement of window with access door at 2nd floor level and additional plant with acoustic screen to roof of second floor, and additional mechanical plant to fifth and sixth floor of university building (Class D1).	Approved – April 2014
2009/1691/L and 2009/1688/P	Alterations to include upgrade and refurbishment of internal common areas including main entrance, corridors, stairs and toilets to provide new reception facilities and internal security gates, relocation of basement toilet to ground floor, removal of internal partitions and installation of external handrails and lighting to main entrance on University Street.	Approved – April 2009
2008/1394/L and 2008/1586/P	New external wheelchair and disabled access ramp and associated modifications to existing entrance door to provide disabled access to existing university building (Class D1).	Approved – April 2008
9100089	Erection of single storey structure to store cylinders for piped gases as shown on drawing numbers 900/01/5`J` 201/101/87A.	Approved – January 1991

The Proposals

This application seeks planning and listed building consent for the erection of a compressed air plant enclosure on the roof of the Rockefeller Building. The description of development is as follows:

"Erection of an air plant enclosure on the roof and a solid acoustic screening of 2.05m and associated works at the edge of the roof of the Rockefeller Building."

The new compressed air plant will require the relocation of 10 existing VFR units, the toilet extractor fan, an existing dry cooler unit and associated duct and service runs. The existing VFR units will be relocated amongst the existing roof plant and will be set back from the edge of the building, to limit their visual impact. The plant enclosure is being utilised to accommodate two new tanks and two new VFR units are proposed on the lower rear roof to serve internal air handling units in the plant room below. The insulated SIPs panels will be clad in a single ply membrane with applied profiles of a dark grey color (RAL 7015), to give an appearance similar to the metal standing seam at the Huntley Street atrium.

The maximum height of the enclosure will not exceed 3.5 m from existing roof level ensuring the enclosure and relocated plant has very limited visibility from street level. Please see page 2 of the Design and Access Statement for further details.

Refurbishment works as consented in planning permission ref. 2018/4242/P are currently undergoing, and therefore a total of 20 dB reduction will be applied to the new air plant enclosure to ensure cumulative noise levels from the consented 2018/4242/P works and proposed air plant enclosure do not exceed LBC's requirements.

In addition, a solid acoustic screening is proposed along the edge of the roof adjacent to the courtyard to further control the noise from some of the rooftop condensers and improve the acoustic quality. The introduction of an acoustic screening ensures that plant noise emissions do not exceed noise limits set by LB Camden. The height of the proposed acoustic screening is 2.05m and will not exceed more than 0.5m of the proposed VRF units. As shown in the submitted drawings, the screening will not be visible from street level as it located at the rear of the roof.

Three other locations were considered for the location of the compressed air plant unit (fourth floor plant desk to the rear courtyard, on the roof to the rear of the building and the Huntley Street roof), however they were discounted for various reasons. Please see page 9 of the accompanying Design and Access Statement for further detail on the discounted options.

Pre-Application Discussions

Pre-application discussions took place with LB Camden Conservation Officers. The principle of development and need for the proposed works were discussed and agreed. The design of the air plant enclosure was presented and officers welcomed the sympathetic design of the elevations.

Planning Policy Considerations

This section of the letter sets out the key planning considerations in relation to heritage, amenity impacts and design and assesses the proposals against these.

Heritage and Design

The NPPF (2019) states that proposals which cause harm to a heritage asset such as a listed building must be suitably justified in accordance with the level of harm caused.

Policy 7.8 'Heritage Assets and Archaeology' of the adopted London Plan (2017) notes that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Camden Local Plan (2016) Policy D1 'Design' seeks to secure high quality design in development. This includes development that carefully integrates building services equipment and respects the surrounding local context and character.

The site is a Grade II listed building, which is located within the Bloomsbury Conservation Area and nearby other listed heritage assets. Camden Local Plan (2016) Policy D2 'Heritage' seeks to preserve, where appropriate, and enhance Camden's heritage assets and their settings. Policy D2 sets out that the Council will not permit substantial harm to a designated asset

The Camden Planning Guidance (CPG) Design (2018) sets out that development will only be permitted where it preserves and enhances the character and appearance of a Conservation Area and listed buildings. Paragraph 3.21 of the CPG states that 'like for like' repairs and maintenance do not require listed building consent. However, where they involve the removal of historic materials, architectural features or would have an impact on the historic interest of the building, consent will be required.

The Camden Planning Guidance (CPG) Design (2018), paragraph 2.12 sets out that materials used should relate to the character and appearance of the area, particularly in conservation areas or within the setting of listed buildings.

Applicant Response and Heritage Assessment

The site is a Grade II listed building and is located within the Bloomsbury Conservation Area. The proposals are limited in their scope and relate to the roof of the Rockefeller Building only.

There are a number of modern plant units previously installed on the roof to support the Medical School, mostly from 1980s onwards. The proposed air plant enclosure will consolidate some of the existing plant and equipment on the roof, thereby improving the listed building and its significance.

The design, massing and location of the air plant enclosure has been carefully considered to ensure it has a very limited visual impact, therefore, the maximum height of the enclosure will not exceed 3.5 m from existing roof level. In addition, the proposed air plant enclosure has been modelled in 3D within the wider urban context to illustrate the visual impact on the wider streetscape. Through the 3D models seen in the Design and Access Statement, it can be confirmed that the proposed plant enclosure is not visible at the Gower Street and University Street junction. Although the plant is slightly visible from the entrance of the Wilkins Building on Gower Street, it is mostly blocked from view by the Cruciform Building. To minimise the visual impact from locations where the plant could be seen, the colour has been carefully chosen (dark grey colour RAL 7015) to give an appearance similar to the metal standing seam roof at the Huntley Street atrium. Therefore, the proposals will have a very limited impact on visual amenity and it is not considered that they will impact on the character or setting of the conservation area, or significance of nearby heritage assets.

Other options for the potential location of the air plant enclosure have been considered but discounted due to insufficient space or visual impact on the street scape. Locations of the discounted options have been further explored in the accompanying Design and Access Statement.

Overall, the proposed works are considered to comply with the policies outlined above.

Noise

Camden Local Plan Policy A4 'Noise and Vibration' seeks to ensure that noise and vibration is controlled and managed. On this basis, planning permission is granted subject to it not causing harm to amenity.

Applicant Response

An acoustic report has been prepared by Hoare Lea (Acoustics Consultant) to ensure noise levels will not cause any disturbance to residential amenity. As identified in the report, long term noise monitoring was undertaken at three different positions close to the site area to establish a representative background noise level at various times of day. The results are reflected in the accompanying report.

In line with LB Camden's requirements, noise levels will be at least 20 dB below the existing background noise level, to ensure the proposed plant unit would not cause harm or impact any of the surrounding amenity.

Hoare Lea recommends the provision of a solid acoustic screening, to ensure that noise from the proposed air plant unit is controlled and managed as much as possible. The acoustic screening will not exceed 2.05m high and will be located at the rear of the roof, therefore will have a very limited impact on visual amenity.

Application Submission

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

- Application Forms prepared by Deloitte Real Estate;
- Location Plan by Burwell Deakins (789_PL_001);
- Site Plan by Burwell Deakins (880_PL_002);
- Design and Access Statement by Burwell Deakins;
- Existing Roof Plan by Burwell Deakins (789_PL_018);
- Proposed Roof by Burwell Deakins (789_PL_038);
- Existing Elevation 1 & 2 (789_PL_060);
- Existing Elevation 3 & 4 (780_PL_061);
- Proposed Elevation 1 & 2 (780_PL_070);
- Proposed Elevation 3 & 4 (789_PL_071);
- Street Sections by Burwell Deakins (880_PL_090);
- Proposed Plant Enclosure (880_PL_720); and
- Acoustic Report by Hoare Lea.

The planning application fee of £462 has been paid online at the time of the submission

We trust that you have all the information you need to validate the application. Should you have any queries with the application, please do not hesitate to contact my colleague Dena Dabbas (ddabbas@deloitte.co.uk/+44 20 7007 2134).

Yours sincerely



Mark Underwood
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