

3 July 2020

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

FAO Laura Hazleton
Your ref: PP-08712484

Dear Laura,

University College London – Kathleen Lonsdale Building, Gower Place, London, WC1E 6BS

Application for Planning and Listed Building Consent for the installation of new condensing units (PP- 08712484)

On behalf of our Client, University College London ('UCL') ('the applicant'), we hereby submit to the London Borough of Camden ('LB Camden') a planning and listed building consent application for the installation of new condensing units within the front lightwell to replace existing units, and the refurbishment of the associated Cold Rooms within the basement of the Kathleen Lonsdale Building (KLB or 'the site'). The description of development is:

"Installation of 7no. new condensing units to replace 2no. existing units within the front lightwell and the refurbishment of the associated 5no. Cold Rooms at basement level of the Kathleen Lonsdale Building, and associated works."

Site Location and Description

The application site is located at the northern edge of the UCL Bloomsbury Campus, on Gower Place. The site is bounded by Gower Place to the north, 3 Gower Place to the east and the Lewis Building to the west. The south of the site is bounded by the Slade School of Fine Art and the Physics Building. 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 KLB is occupied by the Earth Sciences department (Use Class D1).

The KLB is Grade II-listed (list entry number: 1322169). In addition, there are a number of designated heritage assets in close proximity to the site including the Grade I-listed Wilkins Buildings (list entry number: 1113056), the Grade II-listed Rockefeller Building (list entry number: 1113060) and Grade II-listed Cruciform Building (list entry number: 1113056). It is located in the Bloomsbury Conservation Area, within Sub Area 3, 'London University/British Museum.'

The application site is a 4-storey (including basement level) building and was built in 1915 as the first purpose-built Chemistry building for UCL. The principle elevations fronting Gower Place are in a bold

The scope of our Services does not include any consideration of the likely impact of Coronavirus (COVID-19) on the project or transaction to which our Services relate (including but not limited to any impact on valuation, planning, construction, maintenance, or costs). We recommend that if you have not done so already, you should consider the increasingly broad effects of COVID-19 and its negative impact on the UK and global economy and major financial markets.

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Edwardian Baroque style, making a significant impact on the streetscape. The existing plant units are located at basement level within the front lightwell beneath grills, and are obscured from views at street level.

The application relates to the KLB only. The works only relate to the basement area of the building identified in the supporting plans (please refer to architectural drawing number ref. 20105_01 Rev A).

Context to the Application

The site has been adapted over the years, since being constructed in 1915, to suit UCL academic and research occupiers. The building contains laboratories which require the latest technology and mechanical equipment in order to function effectively.

The new plant equipment will replace existing equipment which is past its economic life expectancy. The works will also include the refurbishment of the five associated Cold Rooms which are served by the plant equipment, as identified on supporting plans. This is required to support and improve the existing laboratories within the building. This will contribute to UCL's aspiration to improve the teaching, research and social learning spaces for Earth Sciences, as well as Chemistry, Physics and Astro Physics departments. It will also ensure that UCL continues to compete at a global level in terms of research output, and attracting the best students and staff.

Relevant Planning History

A table setting out the full relevant planning history of the site is included in the appendices of this letter. Of particular note, in 2014 and 2015, applications were submitted for a building wide refurbishment. The refurbishment works have now been implemented. However, since completion, the users have identified additional requirements for the function of their laboratories. This application will facilitate the upgrade of the cold rooms and the replacement of plant equipment to ensure that the laboratories can continue to function to a high standard and to meet user requirements.

There have been a number of planning applications relating to the replacement of plant and machinery equipment at the site. This reflects the continually evolving needs of the users of the building. Details of these applications are set out in Appendix A.

The Proposals

This application seeks planning and listed building consent for the installation of new replacement plant equipment and the refurbishment of selected cold rooms.

The proposal is for the installation of 7no. new condensing units to replace 2no. existing condensing units on the front elevation at basement level of the KLB. The replacement of this equipment is associated with 5no. Cold Rooms within the basement laboratory of the KLB, which will be refurbished as part of these proposals. The existing equipment is past its economic life expectancy and needs to be replaced to ensure the continued function of the laboratories.

To accommodate the room operating requirements of the 5no. Cold Rooms, the existing redundant equipment will be entirely removed, internally and externally. The existing external condensing units will be replaced with new units in the same lightwell location (please refer to the arrangement shown on the accompanying drawing number ref. 20105_04 Rev A). The new internal units shall replace the existing within the refrigerated enclosures on a like for like basis. The existing fabric and insulated linings will remain untouched re-using existing holes for routing of the new services.

Planning Policy Considerations

This section of the letter sets out the key planning considerations in relation to heritage and amenity impacts, 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. The NPPF sets out the test for considering potential impacts of proposed development on a designated heritage asset (Paragraph 193). It further states that any harm to, or loss of, the significance of a designated heritage asset, including Grade II listed buildings, should require clear and convincing justification (Paragraph 194).

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. Additionally, Policy HC1 'Heritage Conservation and Growth' of the emerging New London Plan sets out that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

Camden Local Plan (2017) Policy D1 'Design' seeks to secure high quality design in development. This includes development that preserves or enhances the historic environment and heritage assets and carefully integrates building services equipment.

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 (2017) 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 (2019) sets out that development will only be permitted where it preserves and enhances the character and appearance of a Conservation Area and listed buildings.

The CPG Design (2019), paragraph 2.14 sets out that materials used should respond to existing heritage assets and features by relating to the character and appearance of the area, particularly in conservation areas or within the setting of listed buildings.

Applicant Response and Heritage Impact Assessment

UCL has considered the historical significance of the KLB in the design of the proposals as it is recognised that the KLB is Grade II-listed and located within the Bloomsbury Conservation Area. The proposals are limited in their scope and relate to the area of the KLB identified on the supporting plans only.

The existing condensing units are located on the front elevation at basement level of the KLB, within the lightwell which is screened by a metal grill. The existing condensing units are only visible when stood next to the lightwell and looking down. The proposed new condensing units will be installed in the same lightwell location. As such, the new condensing units will have minimal visual impact on the Conservation Area as the visibility of the condensing units from street level is limited. Due to the minor nature of the proposals and their constrained location, there will be **no impact on the character or setting of the Conservation Area, or the significance or setting of adjoining heritage assets.**

The existing equipment will be entirely removed, internally and externally, and the new external units will be installed in the existing plant location. Additionally, as the existing fabric and insulated linings will remain untouched and existing holes will be reused for routing of the new services, there will be limited impact on

the historic fabric of the heritage asset. Overall, the proposals will have a **negligible** impact on the architectural and historic significance of the listed building.

The proposals will deliver public benefits. The proposed new condensing units are required to support the ongoing use of the building for higher education, which is both its original purpose and optimal use. The new plant equipment and refurbished Cold Rooms will allow UCL staff and students to carry out research to a high standard using the latest equipment and technology. It will also ensure that UCL continues to compete and contribute to academic research at a global level.

Overall, **the proposed works comply with planning policy.**

Noise and Amenity

The NPPF (2019) sets out that new development should not contribute to unacceptable levels of noise pollution.

Policy 2.17 'Reducing and Managing Noise' of the adopted London Plan (2016) sets out that development should avoid significant adverse noise impacts on health and quality of life as a result of new development. Additionally, Policy D14 'Noise' of the draft New London Plan continues to set out this requirement for the impact of noise from new development.

Camden Local Plan (2017) Policy A4 'Noise and Vibration' sets out that the Council will seek to ensure noise and vibration is controlled and managed. This policy also sets out that any noise generating development, including plant and machinery, will only be supported if it can be operated without causing harm to amenity.

Applicant Response

A plant noise impact assessment has been prepared by Environmental Equipment Corporation and submitted in support of this application to ensure noise levels will not cause any disturbance to residential amenity. Due to current circumstances associated with COVID-19 restrictions, the assessment is based on historic noise surveys conducted in the area to represent the likely worst-case existing ambient environmental noise levels.

In line with LB Camden's requirements, the noise limits have been set 10 db below the lowest measured background noise levels in order to produce a worst-case assessment of the noise impact, and to achieve a 'Green' rating.

The assessment identifies that, when assessing the site according to the principles of BS4142, the noise levels are likely to be of very low impact. Predictions have shown that the noise criterion is met at all assessment locations during all periods of the plant's operation, assuming that the plant is installed as proposed.

Therefore, on the basis of this assessment, the noise from the proposals **will not impact residential amenity** and **the application meets policy requirements.**

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 and Certificates prepared by Deloitte;
- Site and Location Plan by ATP (20105_SP01 Rev A);
- Basement Floorplans by ATP (20105_01 Rev A);
- Elevations (Existing Front Elevation; Existing Front Elevation – Street Level) by ATP (20105_02 Rev A);
- Existing Mechanical Services (Existing Elevation; Existing Floorplan) by ATP (20105_03 Rev A);

- Proposed Mechanical Services (Proposed Elevation; Proposed Floorplan) by ATP (20105_04 Rev A);
- Scope of Works by Aston Group (dated 27 March 2020); and,
- Plant Noise Impact Assessment prepared by ECC (dated 6 May 2020).

We trust that you have all the information you need to validate the application. The application has been submitted via planning portal and the fee has been paid online at the time of submission. Should you have any queries with the application, please do not hesitate to contact my colleague Cerys Hulbert (chulbert@deloitte.co.uk / +44 20 70071347).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'M. Underwood', with a stylized flourish at the end.

Mark Underwood

Deloitte LLP

Appendix A

Table below showing relevant planning history.

Application Reference No.	Application Description	Status
2016/2764/L	Reconfiguration and alteration of internal layouts; the erection of rear extension to create lobby for GMP Lab; replacement doors; installation of double glazing to rear windows; alterations to louvres and flues; and installation of plant.	Granted – 20/05/2016
2016/2577/P	Erection of rear extension to create lobby for GMP Lab; replacement doors; installation of double glazing to rear windows; alterations to louvres and flues and installation of plant.	Granted – 20/05/2016
2015/4931/L	Erection of 4 flues at 3rd floor and 1x flue at ground floor on rear elevation.	Granted – 27/08/2015
2015/4924/L	Erection of rear extension to create lobby for GMP Lab, with associated gas enclosure, at west end of basement level.	Granted – 27/08/2015
2015/4349/P	Amendment of planning permission 2014/7223/P granted 28/01/2015 for 'replacement of plant & machinery, new flues & louvres' namely for erection of 4 flues at 3rd floor and 1x flue at ground floor on rear elevation.	Granted – 27/08/2015
2015/4348/P	Erection of rear extension to create lobby for GMP Lab, with associated gas enclosure, at west end of basement level.	Granted – 27/08/2015
2014/7310/L	Alterations in connection with the replacement of plant & machinery, new flues & louvres, replacement of external entrance doors, installation of double glazing to rear windows, including internal alterations to entrance hall security desk, creation of new student hub, reconfiguration of internal layouts involving various alterations to doors, partitions & joinery.	Granted – 01/12/2014
2014/7223/P	Replacement of plant & machinery, new flues & louvres, replacement of external entrance doors, installation of double glazing to rear windows.	Granted – 01/12/2014