



GERALDEVE

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Our ref: LOL/SNE/ASI/U0019122

Your ref: PP-11182779

08 April 2022

Dear Sir/Madam

Darwin Building, 99-105 Gower Street, London, WC1E 6BT
Planning Application for the installation of plant and associated ductwork
Town and Country Planning Act (as amended) 1990

We write on behalf of our client, University College London ('UCL'), to submit a planning application for full planning permission to install and replace plant and associated equipment on the roof and rear elevation of the Darwin Building.

Planning permission is sought for the following:

"Installation and replacement of plant and associated equipment at roof level, and installation of two chilled water pipes and wall-mounted grilles at rear elevation, and other associated works."

Application Documents

In addition to this letter, we submit the following information in support of this application:

- Completed application form, prepared by Gerald Eve LLP;
- CIL Form, prepared by Gerald Eve LLP;
- Site Location Plan, prepared by Burwell Architects;
- Existing and Proposed Plans, prepared by Burwell Architects;
- Design and Access Statement, prepared by Burwell Architects; and
- Noise Impact Assessment, prepared by Vanguardia Limited.

The payment of £462 (plus Planning Portal admin fee) for the application fee has been made via Planning Portal. This application has been submitted via Planning Portal Reference PP-11182779.

Site and Background

This application relates solely to the roof and rear elevation of the Darwin Building which is currently occupied for education purposes. The site is located on Gower Street, with Torrington Place to the

South, and Malet Place to the east. The building is not statutory listed but is located within the Bloomsbury Conservation Area.

Relevant Planning History

From a review of the Council's online planning register, we have provided a summary of the relevant planning applications relating to the Site.

On, 19th August 2008, an application for full planning permission (2008/3078/P) was granted for the following works:

"Installation of 6 chillers at roof level"

On, 31st March 2006, an application for full planning permission (2005/4254/P) was granted for the following works:

"Replacement of one window with louvres at rear elevation and installation of new condenser unit to roof."

On, 12th November 2004, an application for full planning permission (2004/3883/P) was granted for the following works:

"Replacement of 13 new windows and three half windows with louvres, installation of a duct from ground floor to third floor and the installation of a louvred enclosure on the roof above existing lightwell."

On, 28th May 2004, an application for full planning permission (2004/0908/P) was granted for the following works:

"Extension of existing flues sited at roof level to east elevation by 3.5m."

On, 27th January 2004, an application for full planning permission (PSX0304221) was granted for the following works:

"The installation, within a louvre enclosure, of two dry air coolers, above air ventilation housing, as part of a combined heat and power scheme in basement."

On, 11th February 2003, an application for full planning permission (PSX0205308) was granted for the following works:

"Installation of ductwork to rear of Darwin Building, as shown on drawing numbers: 19305/MSK/EN10, UCL/NGP/L/GA000, Unnumbered Photographs."

On, 9th April 2002, an application for full planning permission (PSX0105389) was granted (subject to conditions) for the following works:

"Refurbishment at basement and sub-basement levels and the installation of roof plant and six ducts, as shown on drawing numbers; 5351M-027; 028, 010 Rev.A; 1616/C02; 44/01/02; 44/01/01."

On, 18th July 2000, an application for full planning permission (PSX0004604) was granted (subject to conditions) for the following works:

“The installation of 4 roof mounted chiller units to the rear overlooking the new engineering yard. (as shown on drawing numbers 44/101/55, 44/101/56, 141/493/E, 44/01/10, 44/101/54, 44/50/497, 44/50/498 and 44/50/499).”

On, 15th October 1992, an application for full planning permission (9200666) was granted for the following works:

“The retention of five exhaust ducts stacks and fans on the rear elevation.”

On, 4th February 1987, an application for full planning permission (8601541) was granted (subject to conditions) for the following works:

“Installation of new exhaust ducts stacks and roof mounted fans and repositioning of existing stacks and fans all on the rear elevation to serve the fume cupboards of the refurbished laboratories of the Joint School of Medicine as shown on drawings 52701/AR/7114 7115 and 7116 and 1 unnumbered site plan.”

On, 30th January 1985, an application for full planning permission (8401961) was granted (subject to conditions) for the following works:

“Retention of fume extract duct.”

On, 31st August 1982, an application for full planning permission (34224) was granted for the following works:

“The erection of a fan and duct terminal on top of the service lift motor room.”

As shown by the planning history above, a wide range of planning permissions have previously been granted relating to plant and ducting equipment at the Site and in the location to which this proposal relates.

The Proposal

The works proposed include the installation of additional plant and associated equipment on the roof of the Darwin Building. The additional equipment comprises the replacement of two chillers, addition of six condenser units and a new plate heat exchanger. The plate heat exchanger is required as part of a longer term strategy to replace the chilled water system for the entire building as the existing system has reached the end of its lifespan.

To facilitate the connection and operation of plant equipment on the roof, and installation of ventilation equipment on the fourth floor of the Darwin Building, modifications will be made to the rear elevation. These will include the installation of two chilled water pipes which will run externally from roof level to first floor level, and several wall mounted grilles.

Planning permission is sought for the following:

“Installation and replacement of plant and equipment at roof level, and installation of two chilled water pipes and wall-mounted grilles at rear elevation, and other associated works.”

The works proposed will upgrade the mechanical and electrical services of the existing laboratories to meet the specific requirements of the laboratory refurbishment scheme. The redevelopment will

provide space for research and teaching staff as well as a hub for CLOE research and teaching activities.

The proposals are set out in more detail within the Design and Access Statement and supporting drawings, prepared by Burwell Architects.

The Development Plan

The statutory development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 comprises:

- a) The London Plan (2021); and
- b) Camden's Local Plan (2017).

The NPPF (2021) and Camden's Supplementary Planning Documents are also a material consideration.

Planning Considerations

Noise and vibration

Policy A1 of the Local Plan sets out that the Council will seek to ensure that the quality of life occupiers and neighbours are protected from the impact of development. The relevant factors considered include noise and vibration levels, and odour, fumes and dust.

Policy A4 of the Local Plan sets out that the Council will seek to ensure that noise and vibration is controlled and managed. The Council state that permission will only be granted for noise generating development, including any plant and machinery, where it can be operated without causing harm to amenity.

A Noise Report has been prepared by Vanguardia Limited to assess the proposed use of plant and associated equipment at the Site. The prevailing daytime and night-time background noise levels have been measured and used to set noise limits for the proposed plant and associated equipment. The Noise Impact Assessment concludes that the proposed development is considered suitable in relation to noise and acoustic concerns. As the noise assessment identifies that suitable noise levels can be achieved at nearby residential properties without further attenuation measures, the proposals have therefore demonstrated compliance with Policy A1 and A4 of Camden's Local Plan.

Design and Heritage

Policy D1 of the Local Plan sets out that the Council will seek to secure high quality design in development and requires that development respects local context and character.

Policy D2 of the Local Plan sets out that the Council will seek to preserve and where appropriate, enhance heritage assets and their settings, including conservation areas. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits.

The proposals relate to the installation of plant and associated equipment at the Darwin Building, which is not listed but falls within the Bloomsbury Conservation Area.

The proposals will be located at roof level, and on the rear elevation, and will be read in line with a number of existing pieces of plant equipment and ductwork within these locations. The proposals would not be read from the street level and would be in keeping with the existing views to this Site from other areas within the Conservation Area.

Overall, the proposals are considered to preserve the character and appearance of the conservation area and will not have an impact on the significance of nearby listed buildings. Therefore, the proposal complies with Policies D1 and D2.

Overheating

Policy CC2 of the Local Plan sets out that the Council will seek to ensure that development is resilient to climate change. The Council states that all development should adopt appropriate climate change adaptation measures such as measures to reduce the impact of overheating, including application of the cooling hierarchy, as set out in Policy CC2(d).

Active cooling has historically existed within the building and the proposals seek to retain the active cooling through more efficient measures as part of the laboratory refurbishment works. An extensive planning history is set out above for existing plant equipment located on the roof at the Site. In addition, it is understood that the plant which is to be replaced as part of these proposals has been installed for at least four years. Therefore, it would now be considered lawful development, should it not benefit from a specific planning permission.

The new plant is more economically efficient and will be replacing existing units which provide active cooling to the building and have become redundant, or not suitably efficient. Therefore, the proposal will not be increasing the level of active cooling in the building and instead will just be replacing the existing active cooling.

An overheating assessment has not been undertaken as the capacity of the comfort cooling is not being increased in the proposals. As part of the proposed works, no additional mechanical cooling systems are being installed for the sole purposes of providing occupant thermal comfort. Therefore, the proposal complies with Policy CC2.

Summary

The proposals are being brought forward by UCL to replace outdated plant and equipment and service existing air handling units as part of a wider laboratory refurbishment on the Site.

The proposal is for the removal of existing and obsolescent plant and equipment which will be replaced with new more efficient plant and associated equipment at roof level and along the rear elevation of the building. The proposals accord with the policies of the Development Plan and therefore we seek a positive determination without delay.

We trust that you have all the necessary information to validate this application and we look forward to confirmation of this shortly. If you have any queries, please contact Sam Neal (sneal@geraldeve.com / 020 3486 3312) or Aadam Siddiqui (asiddiqui@geraldeve.com / 020 7333 6246) of this office.

Yours faithfully

Gerald Eve LLP

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