

Laura Dorbeck

From: [REDACTED]
Sent: 21 April 2022 14:40
To: Laura Dorbeck
Cc: Adam Harrison (Cllr)
Subject: RE: Objection: Planning Application 2022/0898/P Rockefeller Building, 21 University Street WC1E 6DE on behalf of CMWG
Attachments: Amenity CPG Jan 2021.pdf; Applicant Cover letter-1.pdf; Local Plan Low Res.pdf

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Good afternoon Laura

I am forwarding CMWG's subsequent correspondence with Councillor Harrison (including attachments) going into more detail about our concerns regarding Application 2022/0898/P for the substation at the Rockefeller Building

Please let us know if you need anything else

Bridget

(On behalf of the Chenies Mews Working Group)

From: Adam Harrison (Cllr) Adam.Harrison@camden.gov.uk
Sent: 18 April 2022 17:47
To: [REDACTED]
Subject: Re: Objection: Planning Application 2022/0898/P Rockefeller Building, 21 University Street WC1E 6DE on behalf of CMWG

Thanks Bridget. Your follow up email is very helpful. Have you shared that, or a version of that, with the planning officers? I find it outlines very clearly the concerns and detail the applicant needs to respond to.

Adam Harrison
Councillor, Bloomsbury ward
Cabinet member for a sustainable Camden
Labour group, London Borough of Camden

From: [REDACTED]
Sent: Tuesday, April 12, 2022 2:51:03 PM
To: Adam Harrison (Cllr) <Adam.Harrison@camden.gov.uk>
Subject: RE: Objection: Planning Application 2022/0898/P Rockefeller Building, 21 University Street WC1E 6DE on behalf of CMWG

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Good afternoon Adam,

Our concerns are three-fold:

1) The logistics of the planned changes

The previous project in the Rockefeller Building was horrendous – we were advised after the event informally that UCL were undertaking an enquiry into the poor project management. There was a marshal who had a cavalier approach to closing the Huntley Street access for extended periods without notice to residents.

We would like to have a Construction Management Plan to manage deliveries, road closures and hours of operation.

While this isn't a major development it ticks many of the boxes for case-by-case assessment in the 2021 Camden Amenity Plan (p16):

- o sites with poor or limited access;
- o sites with restricted access through narrow residential streets;
- o basement developments;
- o the construction process is likely to take place outside normal working hours;
- o where constraints arising from the layout or size of the site could impact on the surrounding road network;

The s106 for the Paul O'Gorman sets prohibits delivery before 8am, we would like this to be carried over to any construction work. This would match the standard weekday working hours of 8am to 6pm in the Camden Amenity Plan (p17).

Even though this work looks like it might qualify for a Construction Management Plan, unfortunately, our experience with the neighbouring Construction Welfare Facility is that UCL does not take Construction Management Plans very seriously (and as far as we can see they also have not applied to extend the 5 year grant of change of use for that facility). How do we make sure that UCL follows the terms of a CMP?

2) The logistics of the operation of the loading after these changes

Despite double yellow no loading/unloading lines on the curbs along the loading bay, UCL contractors and visitors still park blocking the road without using the loading bay. This causes delays, frustration and pollution. We don't want the corner of the road to be used as a de facto loading bay for the actual loading bay. We would like to make sure that the loading bay can be used for its intended purpose after these works.

3) Noise of subsequent plant and operations

It seems that UCL are only applying for planning for the preparatory works for a sub-station and not for the installation of the sub-station itself. UCL have a history of installing plant without regard to the amenity of the local neighbourhood.

- a) Several times we have had to point out maintenance issues as plant noise becomes unbearable (>55dB by our admittedly unscientific smartphone measurements). It is frustrating because UCL has the responsibility of making sure their plant is maintained (Policy A4, 6.99 p211) and they have

conspicuously fallen short of the suggestion in para 6.29 of the 2021 Amenity Plan which “welcome[s] the use of long-term maintenance agreements to ensure that equipment maintains acceptable noise levels over its lifetime and the use of timers to limit any unnecessary operation of the equipment.”

b) Despite asking UCL and Camden Council, there is no sign of the schedule to the s106 controlling plant noise from the Paul O’Gorman. It took a Freedom of Information request to get the s106 from Camden Council after both Camden and UCL claimed there was no copy available, but the schedules are still missing. If UCL are installing fresh plant, surely they should be aware of the limits they agreed to? And they should ensure that existing plant is operating within those limits as well. This is an example of how residents feel that UCL does not always live up to their obligations.

c) UCL state in their application that they do not need planning permission for a substation:

“With regards to the proposed substations, the UCL substation will be an ancillary feature to the existing educational use within the building and therefore would not require planning permission for a material change of use. Furthermore, it is considered that the proposed UKPN substation would fall under Class B, Part 15 of the GPDO 2015 (as amended) and will therefore not require a formal change of use. However, we note that planning permission would be required for any external alterations made to the building to accommodate the substations.”

While it may be correct that no planning permission is required for a change of use, their Cover Letter ignores the fact that all substations require at least an acoustic report under the Camden Amenity Plan 2021 (flowchart on page 23). The UCL application only quotes the 2017 Camden Local Plan (which also requires acoustic reports under para 6.20), they seem to have forgotten or ignored the guidance in the 2021 Camden Amenity Plan.

How can we make sure that the louvres, doors and fittings in this application will be sound-proofed and fit for purpose if we don’t know the acoustic impact of a sub-station? This is our chance to limit intrusive plant noise but UCL are turning a blind eye both to their existing obligations under the Paul O’Gorman s106 and to potential future obligations under the 2017 Camden Local Plan and the 2021 Camden Amenity Plan.

d) Any acoustic report needs to take existing plant limits (including the Paul O’Gorman s106) into account and ensure that all acoustic measurements are taken only after UCL can show that their existing plant has been maintained and is operating within the agreed limits along all their properties down Chenies Mews. Otherwise, it is not a real measure of background noise, the level of background noise will be artificially inflated by existing plant operating above the agreed limits.

e) Finally, noise echoes along Chenies Mews and we would appreciate it if the operation of any doors, lifts and gratings could be as quiet as possible.

I attach relevant documents. More than happy to discuss.

Yours,

Bridget

From: Laura Dorbeck <Laura.Dorbeck@camden.gov.uk>
Sent: 11 April 2022 09:25
To: [REDACTED]
Cc: Adam Harrison (Cllr) <Adam.Harrison@camden.gov.uk>
Subject: RE: Objection: Planning Application 2022/0898/P Rockefeller Building, 21 University Street WC1E 6DE on behalf of CMWG

Dear Bridget,

Thank you for your email. I have logged and noted your objection and it will be duly considered as part of the assessment of the application.

Kind regards,

Laura Dorbeck
Principal Planning Officer

Telephone: 020 7974 1017



The majority of Council staff are continuing to work at home through remote, secure access to our systems. Where possible please communicate with us by telephone or email.

From: [REDACTED]
Sent: 10 April 2022 14:39
To: Laura Dorbeck <Laura.Dorbeck@camden.gov.uk>
Cc: Adam Harrison (Cllr) <Adam.Harrison@camden.gov.uk>
Subject: Objection: Planning Application 2022/0898/P Rockefeller Building, 21 University Street WC1E 6DE on behalf of CMWG

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From: Bridget Cuming on behalf of Chenies Mews Working Group – CMWG. This is an informal Group formed in 2016. The Group's Objective: to do what they can when they can to improve the environment of Chenies Mews as a place to live and work.

To: Laura Dorbeck, Planning Officer, London Borough of Camden Laura.Dorbeck@camden.gov.uk 10 April 2022

Copy to: Cllr Adam Harrison, Bloomsbury Ward, London Borough of Camden adam.harrison@camden.gov.uk

Objection: - Planning Application 2022/0898/P Rockefeller Building, 21 University Street WC1E 6DE

Background:

UCL's Construction Projects have blighted the lives of those who live and work in Chenies Mews. Patient's' access (particularly wheelchair users) to the Roger Williams Building and the Hatter Institute have been difficult & sometimes impossible.

CMWG is keen to avoid a repeat of the "knock on effect" to Chenies Mews of the most recent works in the same Rockefeller Building in University Street, to which this application relates (example photos taken in Chenies Mews contemporaneously Appendix A). Project Management Planning is a main area of concern.

The proposal is likely to have a significant effect on the residential amenity both in the short term, (during the construction work) and in the longer term (with effects of vehicular access to the loading bay) goods yard and noise levels.

Site & Surroundings:

"The area in which works are proposed falls to the rear of the Rockefeller Building within a goods yard which is located behind a set of security gates at the north of Chenies Mews."

The site was part of the highway & became a "loading bay" as a result of a stopping up order in 2004. Since that time, the problems of use of the area (for the purpose for which it was intended) have increased.

The Application refers to "external works are all to be located within the existing goods yard and fire escape alleyway to the rear of the Rockefeller Building. These areas currently comprise a mix of existing plant and servicing runs and are located behind a closed access gate. As such they are not visible from external viewpoints along Chenies Mews".

Noise:

Generally speaking the measuring & monitoring of noise levels in the area appears to be a neglected process. Is this because noise levels accompany individual applications for planning? The lack of an original acoustic report for the P O'Gorman Building makes monitoring noise levels in Chenies Mews problematic too. There is anecdotal evidence that the recently opened UCLH Grafton Way Hospital has also increased noise levels.

Specifically CMWG's concerns about noise are:

1. Noise from the equipment itself
2. Noise from the operation of new facilities like doors, gratings etc which are in use 24/7
3. Noise levels during the period when construction works are in process
4. Noise associated with "anti-social behaviour" during the construction phase

Summary:

CMWG endeavours to be realistic about the opportunities for change in Planning for the future and are keen to continue to work with Camden and UCL to reduce conflict and improve the environment as a place to live and work.

The question to be answered is "Will the approval of this Application improve the quality of life, and of the built and natural environment within Chenies Mews?"

If the answer to this is "yes" – CMWG seeks assurances that in the short term there is a Project Management Plan for the Construction Phase (which is transparent and can be easily bench marked). In the longer term CMWG seeks significantly improved acoustic monitoring and noise control & improved traffic management.

Appendix A Chenies Mews during last Rockefeller Building Project



Bridget Cuming

74 Chenies Mews

London WC1E 6HU

Email: Bridget@cheniesmews.org

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