

Planning Statement

**For: London School of Hygiene
and Tropical Medicine**

**15-17 Tavistock Place
London
WC1H 9SH**

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Signed: *Lambert Smith Hampton*

For and on behalf of Lambert Smith Hampton

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1.0 Introduction

- 1.1 This Planning Statement has been prepared by Lambert Smith Hampton in support of a full planning application on behalf of our client, the London School of Hygiene and Tropical Medicine (LSHTM) ('the applicant'), for planning consent at 15-17 Tavistock Place, Bloomsbury ('the Site').
- 1.2 The London School of Hygiene & Tropical Medicine is renowned for its research, postgraduate studies and continuing education in public and global health. We have an annual research income of more than £190 million and are one of the highest-rated research institutions in the UK. Established in 1899, The London School of Hygiene & Tropical Medicine (LSHTM) is dedicated to improving health worldwide through training the next generation of health leaders to address major public and global health challenges.
- 1.3 The proposed description of development for the planning application is set out below:
- 'External alterations, new plant and plant enclosure at roof level incorporating a green roof and new staircase to provide access to roof level.'*
- 1.4 The LSHTM requires external alterations to the current building to improve the aesthetic appearance of the building's façade. Additionally, works are required to upgrade the plant and access to the roof level.
- 1.5 The Plan led approach at Section 38(6) of the Planning and Compulsory Purchase Act 2004 necessitates that development proposals are determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise. As such, the purpose of this statement is to assess and justify the proposed development within this planning policy context. In doing so, the sections of the report are as follows:
- **Chapter 2: Site and Surroundings** – Analysis of the application site and surrounding area;
 - **Chapter 3: Planning History** – A summary of the relevant planning history;
 - **Chapter 4: The Proposed Development** – A description of the proposed development;
 - **Chapter 5: Pre-application Engagement**
 - **Chapter 6: The Development Plan** – Identifies the relevant local and regional planning policies;
 - **Chapter 7: Planning Appraisal** – An assessment of the proposals within the context of the development plan and other material considerations;

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- **Chapter 8: Section 106 Heads of Terms** – Anticipated obligations and contributions; and
 - **Chapter 9: Conclusions** – Concluding assessment of the proposals.
- 1.6 This Planning Statement seeks to establish that the proposed development be high quality and have limited adverse impacts on the surrounding area, in accordance with Development Plan policy.
- 1.7 The application is supported by the following documents:
- Application Forms prepared by Lambert Smith Hampton;
 - Application Plans and Drawings including:
 - o Location Plan prepared by Rivington Street Studio;
 - o Site Plan prepared by Rivington Street Studio;
 - o Existing and Proposed Elevations prepared by Rivington Street Studio;
 - o Existing and Proposed Floor Plans prepared by Rivington Street Studio;
 - o Existing and Proposed Roof Plans prepared by Rivington Street Studio;
 - o Existing and Proposed Sections prepared by Rivington Street Studio;
 - Cover Letter prepared by LSH;
 - CIL Form 1 prepared by LSH;
 - Planning Statement prepared by Lambert Smith Hampton (LSH); Design and Access Statement (including photographs) prepared by Rivington Street Studio;
 - Acoustic Report prepared by Ion Acoustic;
 - Delivery and Servicing Management Plan prepared by LSHTM;
 - Fire Safety Statement prepared by Buro Happold;
 - Heritage Statement prepared by Conservation Planning;
 - Construction Management Plan prepared by Currie and Brown;
 - Statement of Community Involvement prepared by Engage Involve;
 - Transport Assessment prepared by Charles & Associates;
 - Operation Travel Plan prepared by LSHTM; and
 - Energy and Sustainability Statement prepared by Buro Happold.

2.0 Site Context

- 2.1 The London School of Hygiene and Tropical Medicine (LSHTM) is a public research university in Bloomsbury, central London, and a member institution of the University of London that specialises in public health and tropical medicine. Founded in 1899 at the London Docks, LSHTM is now based in Bloomsbury, where it has two main sites at Keppel Street and Tavistock Place, and additional sites in The Gambia and Uganda.
- 2.2 LSHTM's expertise ranges from the molecular to the global, the theoretical to the applied, the analytical to the political. LSHTM is famed for its international, cultural, professional and academic diversity. Students benefit from exposure to a broad range of perspectives, which expands their knowledge across a multitude of disciplines. Specialised, multidisciplinary programmes are taught by experts in their field, whose own research often informs the teaching curriculum. There are three faculties at the LSHTM, and the School offers a range of postgraduate degrees, including MSc and research degrees, within these fields. Accordingly, the LSHTM is a key employer in the Borough and attracts research funding from across the world.
- 2.3 The application site at Tavistock Place, known as TP1, extends to approximately 0.18 hectares (ha) and is located within the London Borough of Camden (LBC). The site comprises a teaching building belonging to the London School of Hygiene and Tropical Medicine (LSHTM). The Site is located within LBC's wider knowledge quarter, further detail of which is set out below.
- 2.4 The site at 15-17 Tavistock Place is a 19th century main building with a 1960s 'wing'. It was transformed in 2010 with the addition of a new extension containing circulation space running parallel to the rear elevation of the main building. The building is known as TP1 and was opened to provide teaching, research and support office space.
- 2.5 To the rear of the TP1 building is the recently redeveloped TP2 building, which was granted planning permission in 2017 (ref. 2015/3406/P) for:
- "Proposed demolition of existing shed buildings (D1) and erection of a single-2-3 storey medical research laboratory and higher education facility (D1) with basement accommodation of 2 floors and an associated plant on roof."*
- 2.6 The site is predominately surrounded by a residential and hotel development. It is bound by Tavistock Place to the south, an estate agency to the east, the Camden Chinese Community Centre and residential development to the west and several hotels to the north.
- 2.7 The site itself is four storeys in height with a lower ground floor and roof access for maintenance of the plant. The prevailing building heights are largely characterised by terraced hotels and residential properties that are four to five storeys in height. For instance, the hotels adjacent and to the rear of the site are four storeys in height whilst the Mary Ward House Conference Centre to the east of the site extends to five storeys.

2.8 The site is not statutory or locally listed, but it is located within the Bloomsbury Conservation Area, which states the following about the site:

“Tavistock Place is a busier, wider street that is more mixed in character with a larger proportion of buildings dating from the late 19th and early 20th centuries. The height and articulation of the early 19th century four-storey townhouses on the south side, built by Burton to his own designs is echoed in the larger scale but continuous block on the north side at No 15.”

2.9 Although the site is not listed, there are several Grade II Listed buildings near to the Site. The closest buildings are located on Tavistock Place, adjacent to the site and include numbers 18 – 24, 26 – 46 and number 77 incorporating number 75. Additionally, the Mary Ward Centre which is located approximately 25m to the east of the site is Grade II Listed. To the rear of the site, the closest Grade II Listed buildings are numbers 14, 15,16, 18, 19 and 25 on Burton Street. The closets Grade I Listed building is the National Institute for Social Work Training which is located approximately 70m to the east of the site.

2.10 A map of listed buildings in the immediate vicinity is shown in Figure 1 below, with the subject property highlighted:

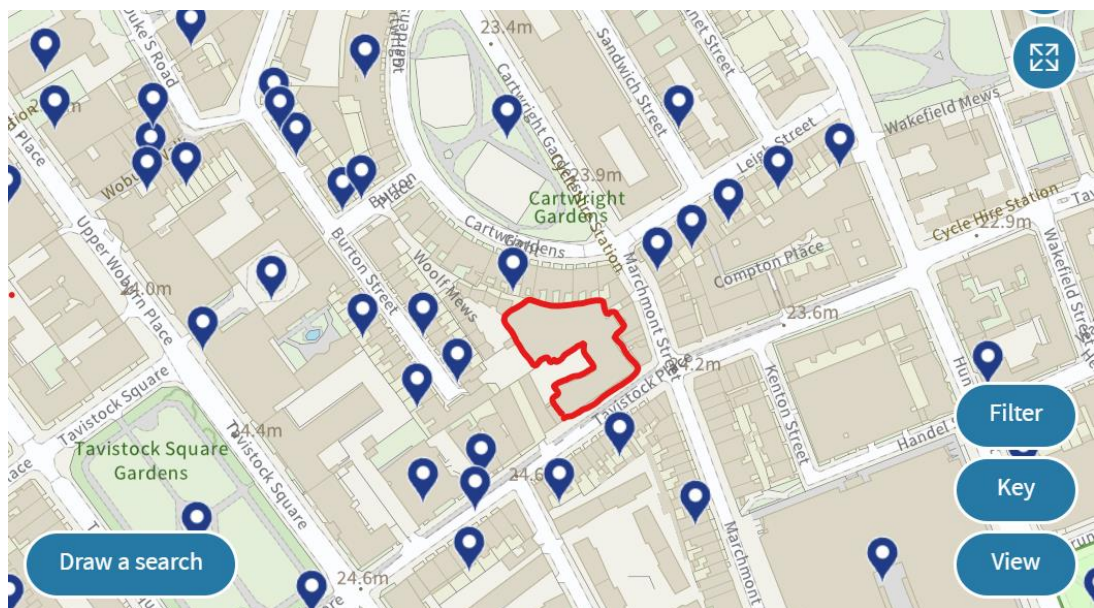


Figure 1: Listed Buildings within the immediate vicinity to the site

2.11 The Site has a PTAL (Public Transport Accessibility Level) score of 6b, the highest rating of access to public transport and is therefore situated in a highly sustainable location.

2.12 The Site is within the London View Framework’s Protected Vista 4A.1/4A.2, inside both the Landmark Viewing Corridor and the Wider Setting Consultation area. The aim of the designation is to protect the view of central London from Primrose Hill and therefore restrict buildings heights which could impact on this view. The proposed development will not impact on this viewing corridor.

- 2.13 The site is four storeys in height with a lower ground floor and roof access for maintenance of the plant. The Site is located within the Environment Agency's Flood Zone 1 and is therefore at low risk of flooding.

Camden Knowledge Quarter

- 2.14 The site is located within Camden's Knowledge Quarter which spans a one-mile radius of King's Cross Station, across two London boroughs (Camden and Westminster); encompassing St Pancras, King's Cross, Bloomsbury and Euston. Figure 2 below shows the extent of the area:



Figure 2: Extent of Camden's Knowledge Quarter

- 2.15 The Knowledge Quarter is viewed as a world-leading innovation district both in the UK and across the world by policymakers and influencers. It has brought together over 100 cultural, research, scientific, business and academic institutions under one umbrella, positioning the area as unique in the knowledge economy.
- 2.16 A key priority for LBC is ensuring that local communities and businesses in Camden benefit from new proposals within the Quarter. The proposals are needed to respond to the current and emerging needs of the knowledge economy. The proposals for at LSHTM TP1 are a key component of development within the Knowledge Quarter and seek to aid the development of these industries and help to build the brand of the Knowledge Quarter both nationally and globally.

3.0 Planning History

3.1 A review of the London Borough of Camden (LBC)'s online planning history database was undertaken for the site. The available planning history for the TP1 building is detailed in the table below, with the most recent decisions set out at the top of the table:

Application Reference	Description of Development	Decision
2019/6221/P	Replacement of the existing doors on Tavistock Place frontage by new doors and formation of a new access ramp and associated railings to create a new main entrance on the front elevation.	Permission Granted 23/03/2020
2017/1550/P	Proposed change of use of part of ground floor from Education Facility (D1) to a restaurant/café (A3)	Permission Granted 19/06/2017
2012/0677/P	Proposed minor commercial alterations including 5 bollards to front elevation and access gate to rear side entrance of educational and office building (B1/D1).	Permission Granted 11/04/2012
2010/5389/P	Proposed commercial change of use with extension including new entrance and security gates and grills and reconfiguration of glazing, escape stairs, landscaping, cycle storage area and solar panels, pursuant to permission 2009/0067/P	Permission Granted 24/03/2011
2009/5188/P	Details of 'ground investigation and proposed remedial measures' and full details of replacement windows pursuant to conditions 6 and 9 of permission 2009/0067/P	Permission Granted 01/04/2010
2010/0495/P	details pursuant to condition 10 of permission 2009/0067/P	Permission Granted 16/03/2010
2009/2878/P	Details of the programme of ground investigation pursuant to condition 6 of permission 2009/0067/P	Permission Part Granted/Refused 31/07/2009
2009/0129/C	Conservation Area Consent for demolition of an existing open-sided steel structure in the rear courtyard	Permission Granted 08/05/2009
2009/0067/P	Commercial change of use and conversion from offices (B1) to flexible business/non-residential institution floorspace (B1/D1) plus alterations and extensions including four storey rear extension in courtyard.	Permission Granted subject to S106 agreement 23/04/2009

3.2 There is no recent planning history that would impact on the current application proposals to upgrade the sustainability and accessibility credentials of the building.

4.0 The Proposed Development

4.1 Full planning Permission is sought for:

“External alterations, new plant and plant enclosure at roof level incorporating a green roof and new staircase to provide access to roof level.”

4.2 The proposed external development comprises:

- i. New plant at roof level (with screening); including four Air Handling Units (AHUs) and three Air Source Heat Pumps (ASHPs) to serve the functions above.
- ii. Extended staircase to provide safe access to the roof.
- iii. Replace failing cladding and windows to the rear courtyard.
- iv. Enhancements to the main entrance and identity of the building.
- v. Minor repairs and upgrades along the street elevation.
- vi. New roofs with improved insulation and localised green roof.

4.3 In addition to the proposed external changes, the internal reconfiguration of the building is also proposed. The proposed internal reconfiguration, seeks to improve the building’s layout and useability, providing upgraded teaching spaces and facilities. It is important to note that as the building is not statutory or locally listed, formal consent for proposed internal works is not required and therefore detail of internal refurbishment works is provided within this application for information purposes only. At the time of submission, LSHTM is seeking to commence the internal refurbishment works in line with the proposed external works.

4.4 Further details of the proposed external works and internal refurbishments are set out within the supporting DAS, prepared by Rivington Street Studios.

5.0 Pre-Application Engagement

5.1 Pre-application advice was sought from the Council regarding the creation of centralised teaching space, new cladding to the courtyard on the northern elevation, new roof plant and extended stair to provide roof access.

5.2 An on-site pre-application meeting was held with Camden Council on 16 August 2023 and a formal pre-application response on 14 September 2023. In consideration of the proposal, the main issues addressed in the formal pre-application advice response included:

- Design and Heritage
- Amenity
- Land Use
- Transport
- Sustainability

Design and Heritage

5.3 The pre-application response confirms that the schemes design and impact on heritage will be acceptable if the materials and finishes used are sympathetic and blend to the host building.

5.4 The principle of the proposed courtyard recladding is also supported subject to the following:

- The courtyard elevations be harmonized;
- The window fenestration changed to match the brown/bronze of TP2; and
- The cladding be returned in cream to match the cream rendered sections of TP2.

5.5 With regards to views, the pre-application response states that the visibility of the plant and noise screen should be kept to a minimum when viewed from the public highway. The pre-application response confirms that the plants proposed location within the central section of the roof to the rear is acceptable as this will be the least visible location in longer views from public realm. However, further detailing and verified views are required for the proposed roof access to ensure it has limited visibility in views from the public realm.

5.6 Additionally, the pre-application response confirms that the approach to signage is supported.

Amenity

5.7 The pre-application advice letter concluded that the proposals are unlikely to cause undue amenity harm to neighbouring occupiers with regards to outlook, sunlight, daylight and light pollution. The advice does however note that a noise impact assessment will be required for the proposed plant and that Camden's minimum standards should be met in line with Local Plan Policy A4 (Noise and Vibration). In compliance with policy, this application is supported by a Noise Assessment.

Land Use

- 5.8 The pre-application response confirmed that the Council has no objection to the proposals in land use terms. The building has been used by the University as staff offices and admin space ancillary to the education use, including meeting rooms and IT services as well as seminar rooms at lower floors. The existing café (Class E) at ground floor in the west wing would be retained. The Council therefore considers that the proposed introduction of more teaching space in the building is therefore not considered to constitute a change of use.

Transport

- 5.9 With regards to cycling, the Council stated that additional cycle spaces would be required to support additional student numbers on site. The provision of vertical cycle parking was discussed at the site visit and the Council set out that they do not generally support vertical or semi-vertical cycle stands, and instead the use of two-tier racks should be explored. Ancillary cycle facilities such as changing and shower rooms should be provided.
- 5.10 The pre-application response also stated that a Construction Management Plan would be required and the previously approved Service Management Plan for the site should be carried forward. Additionally, the Council confirmed that a Transport Statement would be required to be submitted in support of the application. As requested, these documents have been submitted in support of the application.

Sustainability

- 5.11 The Council advised that a Sustainability and Energy Statement should be provided as part of the full planning submission demonstrating how the cooling hierarchy has been followed to reduce energy demands within the building and to justify the need for more plant in accordance with Local Plan Policy CC2 (Adapting to Climate Change). A Sustainability Statement has therefore been submitted in support of the application.

CMP Statement of Community Involvement

- 5.12 It is understood that the development is located within the Cumulative Impact Area. Therefore, from the beginning of the development process, the applicant set out to undertake a transparent and meaningful consultation with the local community. Throughout the process, stakeholders and local people had the chance to provide feedback to the applicant and engage in an ongoing dialogue through the consultation channels.
- 5.13 The feedback from consultation has been considered by the applicant on an ongoing basis to ensure that the issues raised have been addressed through the emerging development proposals. Additionally, the applicant will continue working with all those potentially affected throughout the process to mitigate any adverse impacts.

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- 5.14 As set out within the Statement of Community Involvement prepared by Engage Involve, consultation for the development proposals was undertaken through a multi-phase approach between March and September 2023.
- 5.15 The initial consultation phase was undertaken in March 2023 when the applicant informed the TP2 Community Liaison Group of intentions to refurbish TP1. Members were kept informed of progress during the design stage and the LSHTM 's website was updated between April and August 2023 to outline the plans to refurbish TP1 including the wider Business Strategy Context.
- 5.16 Later stages of engagement included the publication of the draft CMP Framework to the LSHTM website in September 2023 and a consultation letter was issued to 997 addresses in the locality to comment. The consultation period was open between 5th and 17th September for comments questions and suggestions and an in-person consultation meeting was held on 27th September 2023.
- 5.17 The CMP Framework has been updated to reflect the written and in-person feedback and consultation will be ongoing throughout the development process with a live CMP available to all community representatives and stakeholders to comment on at any stage of the project.

6.0 The Development Plan

- 6.1 The plan led approach at Section 38(6) of the Planning and Compulsory Purchase Act 2004 necessitates that development proposals are determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.
- 6.2 An important material consideration in the determination of planning applications is that of Government planning policy and guidance, which takes the form of the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG) respectively and as such these are also considered where appropriate.
- 6.3 The site lies within the London Borough of Camden thus the adopted Camden Local Plan (2017) provides the starting point for the consideration of this application.
- 6.4 The relevant Development Plan comprises the:
- London Plan (2021); and
 - Camden Local Plan (2017)

Camden Local Plan Policies

- 6.5 Local Plan Policy E1 (Economic Development) recognises the importance of education as an employment generating use, and states that the Council will support development of Camden's education sector and promote the development of the Knowledge Quarter. The site is a higher education facility located within the Camden Knowledge Quarter.
- 6.6 Local Plan Policy C2 (Community Facilities) states that the Council will support the investment plans of educational and research bodies to expand their operations, taking into account the social and economic benefits they generate for Camden, London and the UK. The site is an educational establishment, and its development will generate economic benefits for Camden.
- 6.7 Local Plan Policy D1 (Design) states that development proposals must respect the local character and context of the area, including preservation and enhancement of the historic environment and heritage assets. The proposals will respect the local context and character of the area and make a positive contribution to the Conservation Area in line with policy.
- 6.8 Local Plan Policy D2 (Heritage) requires development in conservation areas to preserve or enhance the character of the Conservation Area. In accordance with policy, the development proposals will make a positive contribution to the Conservation Area.
- 6.9 Local Plan Policy A4 (Noise and Vibration) states that the Council will seek to ensure that noise and vibration is controlled and managed. In compliance with policy, the noise limits have been set in accordance with Local Authority requirements.
- 6.10 Local Plan Policy A1 (Managing the Impact of Development), outlines that the Council will resist development that fails to adequately assess and address transport impacts affecting

communities, occupiers, neighbours and the existing transport network. In accordance with policy, the application is supported by a Transport Assessment which states there will not be any noticeable impacts on the local highway network.

- 6.11 Local Plan Policy T1 (Prioritising walking, cycling and public transport) state that development proposals will provide new cycle space in accordance with required cycle space standards. The development proposals comply with the relevant standards.

London Plan Policies

- 6.12 London Plan Policy E8 (Sector Growth Opportunities and Clusters) states that London's higher and further education providers and their development across all parts of London should be promoted. In accordance with policy, the site is a higher education facility and therefore its development should be promoted.
- 6.13 London Plan Policy D3 (Optimising Site Capacity through the design-led approach) asks that proposals deliver buildings and spaces that positively respond to local distinctiveness as well as respect heritage assets that contribute towards local character. The proposals will respect the local context and character of the area and make a positive contribution to the Conservation Area in line with policy.
- 6.14 London Plan Policy HC1 (Heritage, Conservation and Growth) states 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. In line with policy, the development proposals would preserve their setting and offer enhancement to the Conservation Area.
- 6.15 London Plan Policy HC3 (Strategic and Local Views) outlines that development where there is a Protected Vista (PV), should not harm the composition of the PVs, nor the viewer's ability to recognise and appreciate the Strategically-Important Landmark. Due to the minor natures of the proposals, the proposals would not have any adverse effects on the viewing corridor. Whilst there would be a limited glimpsed view of the plant screen at a local level, this would not be detrimental to the viewing corridor.
- 6.16 London Plan Policy HC4 (London View Management Framework) which states that where proposals fall within a designated view, development in the foreground, middle ground or background of a designated view should not be intrusive, unsightly or prominent to the detriment of the view. Due to the relatively minor natures of the proposals, the proposals would not have any adverse effects on the viewing corridor.
- 6.17 London Plan Policy D13 (Agent of Change) states that development proposals should mitigate noise. In compliance with policy, the noise limits have been set in accordance with Local Authority requirements.

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- 6.18 London Plan Policy T5 (Cycling) states that development proposals will provide new cycle space in accordance with required cycle space standards. The development proposals comply with the relevant standards.
- 6.19 Local Plan Policy CC1 (Climate Change Mitigation) states that the Council will require all developments to minimise the effects of climate change. In accordance with policy, the development proposals will enable the LSHTM to meet net zero by 2030.
- 6.20 In addition, a number of Supplementary Planning Documents (SPDs) have been adopted by Camden are considered to be material considerations in the determination of the application. The SPDs that are considered to relevant to this application are:
- Camden Planning Guidance: Air Quality (2021);
 - Camden Planning Guidance: Amenity (2021);
 - Camden Planning Guidance: Design (2021);
 - Camden Planning Guidance: Transport (2021)
 - Camden Planning Guidance: Energy Efficiency and Adaptation (2021).
- 6.21 The London Borough of Camden is in the early stages of reviewing its Local Plan. A Draft Local Plan is expected to be published for consultation in 2024.

7.0 Planning Assessment

7.1 This chapter assesses the development proposals against the relevant local and national planning policies, outlining the key planning benefits of the proposals. As outlined earlier within this report, the proposed internal works do not require formal planning permission and therefore the planning assessment has focused on the acceptability of the proposed external works. Consideration is given to the planning issues arising from the proposed development, including:

- i. Principle of Development
- ii. Design
- iii. Heritage and Visual Impact
- iv. Noise and Amenity
- v. Transport
- vi. Environment, Sustainability and Energy
- vii. Fire Safety
- viii. Planning Benefits

Principle of Development

7.2 The proposals are for external alterations to the building, including replacements to failing cladding and windows to the rear courtyard, enhancements to the main entrance and minor repairs and upgrades along the street elevation, new plant and plant enclosure at roof level incorporating a green roof and a new staircase to provide access more safely to the roof level.

7.3 Local Plan Policy E1 (Economic Development) recognises the importance of education as an employment generating use, and states that the Council will support development of Camden's education sector and promote the development of the Knowledge Quarter around Euston and Kings Cross.

7.4 Local Plan Policy C2 (Community Facilities) states that the Council will support the investment plans of educational and research bodies to expand their operations, taking into account the social and economic benefits they generate for Camden, London and the UK.

7.5 In line with local policy, London Plan Policy E8 (Sector Growth Opportunities and Clusters) states that London's higher and further education providers and their development across all parts of London should be promoted.

7.6 The site is a higher education facility located within the Camden Knowledge Quarter. The proposed internal works will provide improved teaching facilities, including flexible teaching space, social learning and breakout spaces, and welfare facilities. The proposed external façade improvements will improve the external appearance of the building, whilst also improving wayfinding for students and staff using the building. The upgrade of plant at roof level

and introduction of a new staircase to roof level, will not only improve the safety for staff but will also facilitate the upgrade in teaching facilities and improve the environmental credentials of the site. The proposals will therefore contribute towards the promotion of development in the Camden Knowledge Quarter as well as generate social and economic benefits for Camden. The proposals therefore comply with the relevant local and regional policy, and the principle of the proposed development should be supported.

7.7 Local Plan Policies C1 (Health and Wellbeing) and C6 (Access for All) state that development must be accessible by all to the most practicable standards. Development proposals should reduce inequalities and incorporate inclusive design so that users can access buildings and facilities safely and easily. The proposals are for access improvements to aid ease of movement around the site. This includes wider spaces, hold open doors, additional accessible wheelchair and ambulant WCs.

7.8 Additionally, London Plan Policy S3 (Education and Childcare Facilities) states that development proposals for education facilities should ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach. The access improvements as set out above, will make the building more accessible in line with policy.

7.9 The proposals therefore accord with both local and regional policies and should be supported in principle.

Design

7.10 Camden's Local Plan Policy D1 (Design) sets out design and visual impact parameters for development in the borough. The policy outlines that development proposals must adhere to three main design tenets:

- i. Respect the local context and character of the area, including preservation and enhancement of the historic environment and heritage assets.
- ii. Incorporate best practice in resource management. This means being sustainable in design and construction, being of a high quality and complementing the local character through integration and preserving strategic and local views.
- iii. Be inclusive and accessible for all, promoting health, being secure and designed to minimise crime and antisocial behaviour.

7.11 London Plan Policy D3 (Optimising Site Capacity through the design-led approach) asks that proposals deliver buildings and spaces that positively respond to local distinctiveness as well as respect heritage assets that contribute towards local character.

7.12 As set out within the Design and Access Statement (DAS) prepared by Rivington Street Studio submitted in support of the application, the development proposals include a number of external alterations including the provision of new cladding. The new cladding will have a neutral

backdrop which will improve the setting of the TP1 building in line with the adjacent TP2 building to respect the local context and character of the area in accordance with policy.

- 7.13 Additionally, the proposals are to enhance the main entrance and identity of the building through localised repairs and redecoration of railings and replacement of the existing (nonoriginal) doors and two window sets to open out the building and make it more welcoming. Both the railings and doors will be replaced in line with the existing development and therefore there will be no adverse effects on the character of the area. Moreover, the planters proposed will soften the entrance so that it follows a similar precedent to the Mary Ward House down the road. As set out within the supporting Heritage Statement prepared by Conservation Planning, the proposals will therefore make a positive contribution to the Conservation Area and surrounding context in line with Local Plan Policy D1 (Design).
- 7.14 The new plant proposed is set back to the rear of the roof. Several options were tested for the plant in the early stages of design to assess the visual impact on the surrounding streetscape and establish the optimum location to position the plant. It was considered that the plant was best placed to the rear of the roof as in this position it is not visible from points directly across the road and is only partially visible from longer distance views. Therefore, there will be minimal impact from on the surrounding townscape and no discernible impact on the character and design of the building. Additionally, the plant is screened which reduces visual impact and provides good visual screening when viewed from street level. Moreover, the proposed staircase to the roof will not be visible from ground level and in accordance with the existing materials. The proposals for new plant will therefore not be incongruous with the sites surroundings and the local character and context of the area will continue to be protected in line with policy.
- 7.15 The increase in massing is considered to be acceptable in planning terms and will not have a material impact on views from surrounding streets given the existing building height, proximity to neighbouring buildings and the surrounding context of the site.

Heritage

- 7.16 The NPPF requires that Heritage Assets (which includes archaeological remains) are conserved in a manner appropriate to their significance so they can be enjoyed for their contribution to quality of life for future generations. Footnote 7 of the Framework confirms that that policies in the Framework that protect assets of particular importance include designated heritage assets. The site is located within the Bloomsbury Conservation Area. Local Plan Policy D2 (Heritage) requires development in conservation areas to preserve or enhance the character of the Conservation Area.
- 7.17 Policy D2 also states that the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public

benefits of the proposal convincingly outweigh that harm. Accordingly, the benefits of the proposals are considered in more detail in the overall planning balance section below.

- 7.18 London Plan Policy HC1 (Heritage, Conservation and Growth) states 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.
- 7.19 The application is supported by a Heritage Statement prepared by Conservation Planning. As detailed within the Heritage Statement, the Site is considered to make a positive contribution to the street scene, character and appearance of the Conservation Area.
- 7.20 The Heritage Statement, the proposals to remodel the interior of the building to create additional teaching and learning spaces would not have any adverse impact on the architectural interest of the street elevation or contribution made to the Conservation Area.
- 7.21 Additionally, the Heritage Statement sets out that the external alterations and enhancements to the street elevations including new planters, improved signage and changes to railings and lights, would offer enhancement to the appearance of this part of the Conservation Area.
- 7.22 As set out within the Heritage Statement, the proposed building services plant and screen wall would not have any impact on the architectural interest of 15-17 Tavistock Place. It would be sufficiently set back on the flat roof as to not have any disrupting effect on the front elevation which would continue to be terminated by the line of a clean, unbroken parapet wall.
- 7.23 There would be one limited, glimpsed view of a corner of the plant screen when seen at street level just beyond the corner with Herbrand Street but overall, the impact on the character or appearance of the Bloomsbury Conservation Area would be negligible and no harm would be caused to the attributes of the Bloomsbury Conservation Area that make it special. The proposals will therefore preserve the historic environment and heritage assets in line with Policy.
- 7.24 Overall, the Heritage Statement concludes that the impact on the character or appearance of the Bloomsbury Conservation Area would be negligible and the impact upon the attributes in the appraisals description of Tavistock Place would be de-minimus. Therefore, it is considered that the proposals align with both Local Plan Policy D2 (Heritage) and London Plan Policy HC1 (Heritage, Conservation and Growth). and should be supported in principle. Notwithstanding this, we have also carried out an assessment in the overall planning balance, in accordance with the requirements of the NPPF, which is considered subsequently.

Visual Impact

- 7.25 The site is located within the London View Framework's Protected Vista 4A.1/4A.2 (Primrose Hill) inside both the Landmark Viewing Corridor and the Wider Setting Consultation area. Local Plan Policy D1 (Design) states that the Council will seek to preserve or enhance strategic views. Accordingly, London Plan Policy HC3 (Strategic and Local Views) states proposals must be

assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.

- 7.26 The policy outlines that development where there is a Protected Vista (PV), should not harm the composition of the PVs, nor the viewer's ability to recognise and appreciate the Strategically-Important Landmark, whether the development proposal falls inside the Wider Setting Consultation area or not.
- 7.27 This is further set out in London Plan Policy HC4 (London View Management Framework) which states that where proposals fall within a designated view, development in the foreground, middle ground or background of a designated view should not be intrusive, unsightly or prominent to the detriment of the view.
- 7.28 In accordance with London Plan Policies, the Heritage Statement sets out that verified views have demonstrated that the proposals would not have any adverse effects on the viewing corridor and would not be visible from primrose Hill due to the minor nature of the proposals. At street level, from the east and junction with Marchmont Street, the plant would be entirely invisible and the parapet wall would continue to provide a clean, unbroken top to the building. Additionally, from the south side of Tavistock Place in front of the School, it would not be possible to see the plant. There would, however, be a limited glimpsed view of the plant screen from the view to the west at the junction of Herbrand Street but this would not be detrimental to the viewing corridor.
- 7.29 It is therefore considered that the proposals are in accordance with the above local and London plan policies.

Noise and Amenity

- 7.30 Local Plan Policy A4 (Noise and Vibration) states that the Council will seek to ensure that noise and vibration is controlled and managed. Development should have regard to Camden's Noise and Vibration Thresholds. The policy goes on to state that planning permission will not be granted for development likely to generate unacceptable noise and vibration impacts, or development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses. Similarly, London Plan Policy D13 (Agent of Change) states that development proposals should mitigate noise.
- 7.31 The focus on additional teaching space will increase occupancy of the building and result in higher concentrations of people in specific places for set periods. Therefore, to accommodate these criteria, a mechanically ventilated system is required and therefore an improved external plant solution comprising four AHUs and three ASHPs has been proposed at roof level. The proposals will mitigate any adverse impacts caused by noise through proposed screening which will manage and insulate sound by separating any major sources of noise from noise sensitive developments. As set out within the supporting Acoustic Report prepared by Ion Acoustics, a

- plant noise assessment has been completed, considering the proposed new equipment related to the development of TP1. The Acoustic Report details the expected plant equipment and mitigation measures and confirms that the noise limits have been set in accordance with Local Authority requirements to comply with SKA D25 credit during all time periods and modes of operation, at all assessed positions. It is therefore considered that the development proposals for the mechanically ventilated plant will not result in any detrimental impact on local noise levels and will therefore be in compliance with Local Plan Policy A4 (Noise and Vibration).
- 7.32 Furthermore, Local Plan Policy A1 (Managing the Impact of Development) states that development proposals are required to avoid development which causes unacceptable harm to amenity including visual, privacy and outlook, impacts of the construction phase, noise and vibration levels, and odour, fumes and dust.
- 7.33 In accordance with Local Plan Policy, London Plan Policy D3 (Optimising Site Capacity through the Design-Led Approach) states proposals should deliver appropriate outlook, privacy and amenity to a site's users, and that the experience of a proposal should help prevent or mitigate the impacts of noise and poor air quality.
- 7.34 The proposed external amendments will not impact on the amenity of neighbouring properties and are therefore considered to align with adopted policy.
- 7.35 The application submission is- also supported by a Construction Management Plan (CMP), which addresses the way in which any impacts associated with the proposed works and their cumulative impacts will be mitigated and managed. The CMP sets out that the construction site will comply with the Construction Logistics and Community Safety (CLOCs) to minimise vehicular and construction disturbance on local amenity.
- 7.36 As set out within the CMP, construction works will be undertaken in line with section 72 of the Control of Pollution Act and British Standard BS5228: 2009 'Noise and Vibration Control on Construction and Open Sites' in order to control noise and vibration in line with general principles. Whilst it is considered that works are primarily for internal fit outs and won't cause any noticeable noise disruption to adjacent properties, all works will take place within stipulated times and construction methods will be selected to minimise noise and vibration. Additionally, local residents will be advised when works are programmed, and the site contact details and out of hours emergency contact details will be displayed on the site hoarding if anybody has a complaint.
- 7.37 As stated within the CMP, the contractor will use a hierarchal policy of prevention, suppression and containment with regards to dust control. If dust is observed in the air or deposited on vehicles or other sensitive receptors, works will be suspended. However, given that the project primarily consists of internal works, with limited external works, dust activities will be minimal, and the site is therefore considered to be a low impact risk level site.

Transport

- 7.38 Local Plan Policy A1 (Managing the Impact of Development), outlines that the Council will resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network.
- 7.39 The application is supported by a Transport Assessment and Travel Plan which state that a traffic survey has been undertaken and whilst the proposed redevelopment would result in an increase in person trips over a typical day, there would be an imperceptible increase in vehicle movements and so there would not be any noticeable impacts on the local highway network.
- 7.40 In line with Local Plan Policy T1 (Prioritising walking, cycling and public transport) and London Plan Policy T5 (Cycling), the development proposals will provide new cycle space in accordance with required cycle space standards. This will promote sustainable transport in the borough and encourage students to cycle between the LSHTM's Tavistock Road campus and the LSHTM's Keppel Street campus.
- 7.41 As set out within the Transport Statement calculations, there is a requirement for 50 long stay spaces and 57 short stay cycle spaces. The development proposals will comply with these requirements providing the following number of spaces in total for TP2 and TP1:

Type	Requirement	Provision
Long Stay	50 spaces	46 existing spaces in TP2 basement Plus 10 new spaces in TP1 ground floor Total 56 spaces
Short Stay	57 spaces	31 existing Sheffield stands Plus 50 new vertical stands Total 81 spaces

- 7.42 Additionally, the development proposals are supported by a Travel Plan prepared by LSHTM which outlines how LSHTM will endeavour to improve their overall sustainable travel performance and edge toward their Net Zero by 2030 carbon reduction target; setting out targets related to the delivery of the necessary infrastructure to support sustainable travel.
- 7.43 Moreover, the application is supported by a Delivery and Servicing Management Plan prepared by LSHTM which sets out the School's proposals for the efficient and effective management of servicing and delivery trips that would be generated by the development and demonstrates their commitment to the employment of best practice and to the reduction of the impacts of delivery and servicing activity on the environment. The School will implement a programme of monitoring and review to ensure that best practice is maintained. Therefore, there will be no adverse impacts from delivery and servicing activities.

Environment, Sustainability and Energy

- 7.44 As set out within the supporting Energy and Sustainability Statement prepared by Buro Happold the development proposals will improve the sustainability credentials of the building in accordance with Local Plan Policies CC1 (Climate Change Mitigation) and CC2 (Adapting to Climate Change). The improvements to the building fabric include new cladding, new insulation roof, efficient LED lighting and controls, replacement windows and entrance door, which will improve the building's thermal performance, reduce energy consumption, and enhance indoor comfort for occupants. Additionally, the installation of the low carbon mechanical plant, increased PV provision as well as new and upgraded services including intelligent monitoring and control, will help reduce carbon use.
- 7.45 As highlighted within the Sustainability Report, LSTHM has targeted achieving net zero by 2030 and therefore the school and design team have put forward a zero-carbon strategy which will help the school meet its decarbonisation plan. The proposals are therefore compliant with Local Plan Policies CC1 (Climate Change Mitigation) and CC2 (Adapting to Climate Change).
- 7.46 The replacement of the existing windows with energy-efficient secondary glazing will significantly reduce heat loss and improve the building's thermal insulation. This improvement will contribute to a substantial reduction in energy consumption for space heating and cooling, thereby decreasing the building's carbon footprint. Additionally, by reducing the energy demand for heating and cooling, the proposed window replacements will lead to a reduction in greenhouse gas emissions in line with Local Plan Policies and London Plan Policy SI2 (Minimising Greenhouse Gas Emissions).
- 7.47 Furthermore, the energy efficiency improvements resulting from the improvements to the building fabric will lead to long-term cost savings for the building's occupants. Reduced energy bills will contribute to the economic sustainability of the School.
- 7.48 Additionally, the proposed new green roof green will result in biodiversity enhancements for the building in line with Local Plan Policies CC2 (Adapting to Climate Change) and A3 (Biodiversity) and London Plan Policies G5 (Urban Greening) and G6 (Biodiversity and Access to Nature).
- 7.49 The proposals will thus result in increased sustainability benefits for the building and are targeting SKA rating 'silver' as a minimum, with an aspiration of 'gold'. The development proposals are therefore in accordance with both Local Plan Policies CC1 (Climate Change Mitigation) and CC2 (Adapting to Climate Change) as well as London Plan Policy SI2 (Minimising Greenhouse Gas Emissions).

Fire Safety

- 7.50 London Plan Policy D12 (Fire Safety) outlines that all development proposals must achieve the highest standards of fire safety. The policy requires that all development proposals for external changes to a building should be submitted with a Fire Statement that details how the

development will function in terms of the building's construction, means of escape for building users, features which reduce the risk to life as well as access for fire personnel and equipment.

- 7.51 A fire safety statement has been produced which outlines the approach and provisions relating to fire safety, demonstrating that the development is in compliance with London Plan Policy D12 (Fire Safety). This includes the provision of new insulation and fire cement cladding as well as the installation of new internal fire lining. The Fire Statement prepared by Buro Happold, provides further detail of the fire safety strategy for the building, which has been prepared in line with London Plan Policy D12 (Fire Safety). The strategy includes details on the means of escape, active systems, internal and external fire spread, Fire Service access and fire safety management.

Planning Balance

- 7.52 As noted above, the application is supported by a Heritage Statement, which concludes that the impact on the character or appearance of the Bloomsbury Conservation Area would be negligible and the impact upon the attributes in the appraisals description of Tavistock Place would be de-minimus. Notwithstanding this, should the Council reach an alternative view e.g. less than substantial harm, it would be necessary to apply the relevant tests as set out within the NPPF and Development Plan.
- 7.53 In accordance with paragraph 202 of the NPPF, less than substantial harm to designated heritage assets should be weighed against the public benefits of the proposal. Accordingly, it is appropriate to consider any perceived heritage harm against the benefits, which includes a significant number of public benefits associated with the application, including improved educational facilities at a renowned teaching and learning facility with international presence.
- 7.54 Additional public benefits of the scheme are set out below:
1. **Improved Sustainability Credentials:** The proposals will deliver significant sustainability benefits through reuse of the existing building to reduce embodied carbon as well as provide new and upgraded services including intelligent monitoring and control and non-carbon energy-based energy sources.
 2. **Enhanced Appearance:** The external alterations will improve the aesthetic appearance of the building's façade; making a positive contribution to the street scene and enhancing this part of the Conservation Area.
 3. **Improved Wayfinding:** The proposed amendments to the entrance of the building and introduction of new building signage, will improve wayfinding to the site for both students and staff.
 4. **Respect Character and Context:** The proposed scheme will respect the character and context of the Bloomsbury Conservation Area and have no impact on the design and character of neighbouring properties or their amenity.

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5. **Biodiversity:** The creation of new green roof area, allows the creation of a green roof which will enable biodiversity enhancements.
 6. **Improved Safety:** External improvements to the building level including a new staircase to roof level for management of the plant, and new insulation and fire cement cladding will improve the operational safety of the building for both students and staff.
- 7.55 In addition to the planning benefits of the proposed external amendments, it should also be noted that the planned internal refurbishment will also provide a number of benefits to complement the proposed external changes:
1. **Improved Teaching and Learning Facilities:** The proposals including the remodelling of the building will increase the amount of available teaching space which is currently limited.
 2. **Improved Accessibility of the Building:** The internal alterations including widening reception space, widening breakout spaces and providing additional accessible wheelchair WC's will improve facilities and ease of movement to and around the building.

8.0 Section 106 Heads of Terms

- 8.1 This chapter sets out a summary of the draft Section 106 Heads of Terms for the proposed external alterations.
- 8.2 If planning permission is to be granted, we anticipate the following obligations and contributions shall be secured:
- 8.2.1 CMP Implementation Support Contribution.
 - 8.2.2 CMP bond to cover the Council's cost for review, monitoring and enforcing the CMP.
 - 8.2.3 Non-financial obligations such as management plans, or car-free restrictions.
 - 8.2.4 Monitoring Charge of £572 per head of term (as of October 2018 – increase on an annual basis by up to 3%).

9.0 Summary and Conclusions

- 9.1 This Planning Statement, prepared on behalf of our client the LSHTM, provides an appraisal of the key development plan planning considerations for the proposed development at 15 – 17 Tavistock Place. We have assessed the key land use policies relating to the development of the site including design, heritage, visual impact, amenity and sustainability and considered these in the overall planning balance.
- 9.2 The LSHTM is a public research university in Bloomsbury, central London, and a member institution of the University of London that specialises in public health and tropical medicine. The campus is located in the Camden Knowledge Quarter. The improvements to the building's façade and the functionality of the building, will therefore not only enable the LSHTM to further its internal reputation within the borough for delivering world class education and research activities, but it will help build the brand of the Knowledge Quarter both nationally and globally.
- 9.3 The proposed external alterations, including new cladding, replacing windows and entrance door, improved signage and new planters will not detract from the existing street scene or the overall character and appearance of the building or have any adverse effects on the character or appearance of the Bloomsbury Conservation Area. The proposals will make a positive contribution to the street scene and the buildings historic significance, in accordance with Local Plan Policy D2 (Heritage) and London Plan Policy HC1 (Heritage, Conservation and Growth).
- 9.4 Additionally, the proposals for new plant will not be detrimental to the designated viewing corridor which the site falls within. The plant is set back to the rear of the roof, and it is considered that the impact upon views at street level would be negligible. Moreover, the Heritage Statement confirms that the impact on the character and appearance of the Bloomsbury Conservation Area would also be negligible.
- 9.5 Additionally, as set out within the supporting Acoustic Assessment, plant is screened and the noise limits have been set in accordance with Local Authority requirements to comply with SKA D25 credit during all time periods, modes of operation and at all assessed positions. Therefore, there will be no adverse effects on local noise amenity. Although for planning permission is not required for the internal reconfiguration works, the amendments to the building layout will enable the LSHTM to expand their operations and provide increased teaching space and welfare facilities. Additionally, the improvements to accessibility including widening spaces and providing additional accessible wheelchair and ambulant WCs will make the building more inclusive to a range of users.
- 9.6 Furthermore, the development proposals will improve the buildings sustainability credentials as they will improve the building's thermal performance, reduce energy consumption, and enhance indoor comfort for occupants, which is in accordance with Local Plan Policies CC1 (Climate Change Mitigation) and CC2 (Adapting to Climate Change) as well as London Plan Policy SI2 (Minimising Greenhouse Gas Emissions).

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- 9.7 Overall, the development proposals would deliver significant benefits including improved sustainability credentials, enhanced appearance of the buildings façade, improved wayfinding for both students and staff, conserve the character and context of the Bloomsbury Conservation Area, biodiversity enhancements and improved safety. It is therefore considered that there are a significant number of public benefits associated with the application that would outweigh any perceived heritage harm.
- 9.8 The proposed development therefore accords with the relevant policies of the Camden Local Plan (2017), London Plan (2021), the NPPF (2023) and relevant supplementary planning documents. Consequently, the scheme should be supported by the council and planning permission be granted.

Lambert Smith Hampton

October 2023