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**Sent via planning portal only**

Dear Sir/Madam

**FULL PLANNING AND LISTED BUILDING CONSENT**

**INSTALLATION OF THREE EXTERNAL HVAC UNITS AT SECOND FLOOR OF TAVISTOCK HOUSE SOUTH,  
INCLUDING LOUVRES AND INTERNAL CASSETTE UNITS**

**BMA HOUSE, 13 TAVISTOCK SQUARE, LONDON, WC1H 9JP**

Please accept this covering letter as an accompaniment to this full planning and listed building consent application for minor works at the British Medical Association (BMA) complex. This letter provides a summary of the site and the proposed development and associated justification for the works.

**The site**

The site is located on the north-east side of Tavistock Square (A4200) and comprises a five storey, grade II listed building occupied by the British Medical Association. The site is located within the Bloomsbury Conservation Area and the surrounding context is historically and architecturally sensitive, comprising a number of Grade I, Grade II and Grade II\* listed buildings.

**The Proposal**

The proposal subject of this application includes minor internal alterations to facilitate the installation of three external HVAC units on the second floor of Tavistock House South.

The internal space is served windows which provide very little airflow and no cooling capacity to the space. The proposal will therefore help to achieve comfortable working conditions and the units will be discretely placed on anti-vibration mounts locally behind the parapets at level 2 where they will be completely concealed from any view.

## **Planning Policy/Legislation**

### **Legislation**

#### ***Planning (Listed buildings and Conservation Areas) Act 1990***

Section 66 of the Planning (Listed buildings and Conservation Areas) Act 1990 requires the Council to have special regard to the desirability of preserving listed buildings or their settings or any features of special architectural interest.

Section 72 of the Planning (Listed buildings and Conservation Areas) Act 1990 requires the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

### **National planning policy**

#### ***National Planning Policy Framework (2021)***

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development which incorporates three specific strands – economic, environmental and social. The following sections are relevant to the consideration of this application; Section 6 (Building a Strong, Competitive Economy; Section 12 (achieving well designed places) and Section 16 (conserving and enhancing the historic environment).

### **Local Planning Policy**

For the purposes of this application, the adopted development plan for the London Borough of Camden comprises the London Plan (2021), the Camden Local Plan (2017) and Camden Planning Guidance Documents (CPG). Also of relevance is the Bloomsbury Conservation Area Appraisal and Management Strategy (2011). The following policies are considered relevant to the consideration and determination of this application:

#### **London Plan (LP) 2021**

- Policy D4 – Delivering Good Design
- Policy HC1 – Heritage Conservation and Growth

#### **Camden Local Plan (CLP) 2017**

- Policy D1 – Design
- Policy D2 – Heritage
- Policy C5 – Safety and Security
- Policy CC1 – Climate Change Mitigation
- Policy CC2 – Adapting to Climate Change

Camden Planning Guidance (CPG) & other guidance

- Employment Sites and Business Premises (2021)
- Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

**Planning Assessment**

***Principle of development:***

Law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

The site comprises a building in active office use and no changes are proposed to the established use class. In such locations, there are no development plan or national planning policies that restrict the alteration of properties in principle, subject to the consideration of all other detailed matters.

***Design and visual impacts:***

Section 12 of the NPPF refers to well-designed places. Paragraph 130 (c) states that planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

Camden Local Plan Policy D1 requires development to be of the highest architectural and urban design quality and have particular regard to design and visual impact and to the context within which it is placed, and the contribution it makes to the landscape qualities of the area. The aim of this policy is reflected in London Plan Policy D4 (Good Design).

None of the proposed development will be visible in the public domain. The location of the units has been carefully selected to ensure they sit behind an existing parapet. This is seen clearly in elevation drawings A & B.

In addition, the proposed works represent development that is reasonably expected within the confines of large-scale office space. This aligns with the competing local plan objective of building a strong competitive economy and creates no visual harm or, by proxy, no harm to the character and appearance of the area, in accordance with the development plan.

***Heritage Impact:***

Case law dictates that decision makers are required to give great weight to any harm to the significance of a heritage asset and how this should be applied is set out in section 16 of the NPPF. CLP Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas. These aims are further reflected in London Plan Policy HC1 (Heritage Conservation and Growth).

In terms of the heritage asset itself, BMA House is a grade II listed building. The list description for the building sets out that the entire site is grade II listed. The list description notes that the interior is altered and now 'modern offices'.

The summary of the site's importance is given as:

*A fine, albeit incomplete, example of Lutyens' earlier work in the neo-classical idiom. The later additions by Wontner-Smith and Wood, which form the majority of the building, are dignified and well-detailed; the whole ensemble representing a distinguished and coherent complex of multi-phase buildings. Of historic interest as the headquarters of the BMA since 1925.*

The list description identifies several areas where value can be attributed to the existing building:

- An example of Lutyens' earlier work albeit incomplete;
- The high architectural quality of the later Wontner-Smith and Wood additions;
- While individual elements have value, the site as a whole is a distinguished and coherent complex; and,
- The association with the BMA since 1925

The building's list description notes that '*the interior is considerably altered*'. The relatively recent listing of the building has meant that various internal and external alterations have taken place prior to listing that were obviously undertaken outside of the listed building consent regime. This has resulted in the loss of some of the building's internal features and character. Alteration has left the interior of the building with less of a robust 1930s character than its exterior and as a result, there are clear opportunities for enhancement, particularly in the context of the need to ensure established office space is suitable for modern requirements.

The existing building also forms part of the Bloomsbury Conservation Area. It is located within Sub Area 6 of the conservation area: Bloomsbury Square/Russell Square/Tavistock Square. Any proposed alterations, particularly external alterations, should take into account their effect on the character and appearance of the conservation area.

Block F is already significantly altered and the proposed internal works will not erode either original plan form or building fabric. The external alterations would be largely de minimis in the context of the site and building itself.

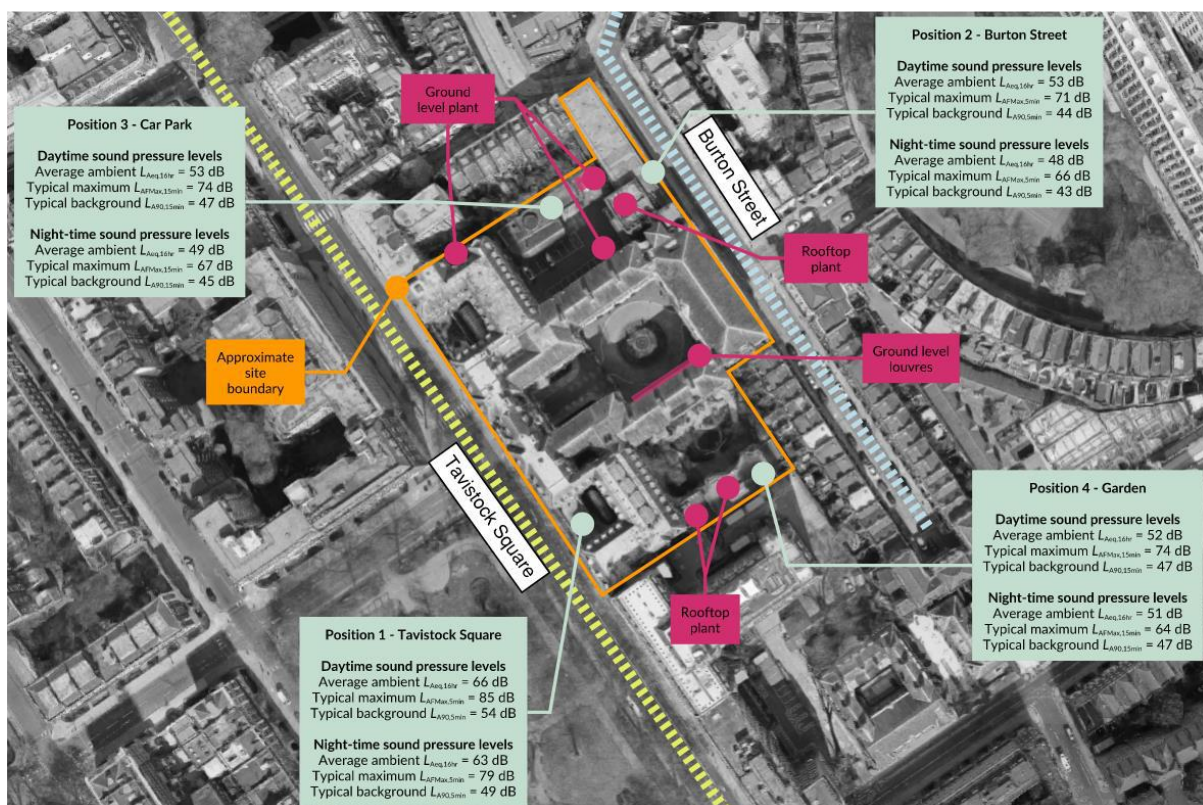
The proposals are intended to be entirely respectful of the principal listed building. The proposals see a minor adaptation of an altered element of the building where there is scope for further sympathetic change and alteration. Similarly, the proposals would not cause harm to the character and appearance of the conservation area as a designated heritage asset. The proposed scheme is therefore considered to comply with national and local historic environment policy for these reasons and for those set out above.

### Impact on Amenity (proposed plant)

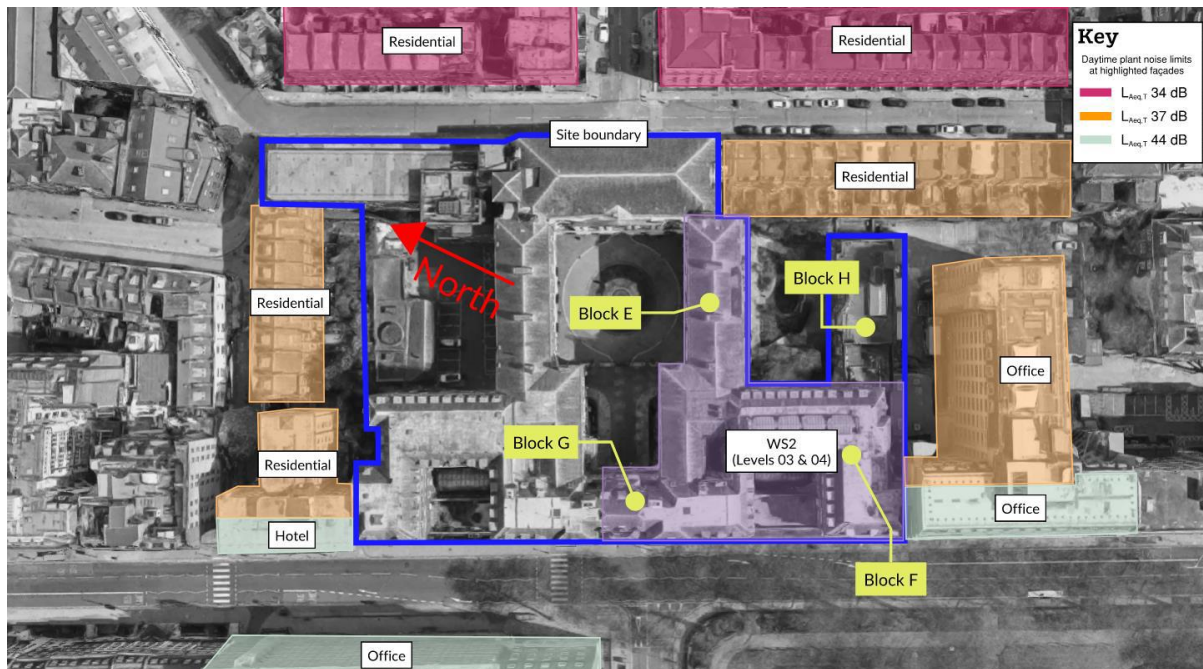
CLP Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. It seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for development that would not harm the amenity of neighbouring residents. CLP Policy A4 states that the Council will not grant planning permission for development that is likely to generate unacceptable noise and vibration impacts.

As set out above, the location of the equipment is located in a commercial setting. The BMA complex is extensive and the proposed plant would be both significantly separated and screened from wider residential development. It would not therefore impact adversely on residential amenity and in any case will be mounted on anti-vibration weighted mounts.

This position is substantiated further by the presence of Tavistock Square to the front of the proposed siting of the plant. A recent noise survey identifies the site of the plant in this instance as having the most significant background noise levels and it is reasonable to conclude that this is because of the presence of the busy highway, which includes several bus routes – see image below:



Furthermore, the image below highlights that the siting of the plant as proposed, is significantly and by proxy, adequately, removed from residential development to the extent that it will not lead to adverse impact on amenity.



## ***Sustainability***

Local Plan Policy CC2 states that all development should adopt appropriate climate change adaptation measures such as measures to reduce the impact of urban overheating.

In this instance, heating/cooling is required in order to ensure the space is appropriate for modern demands. This is not only important in the context of building a strong, competitive economy but also for the long-term preservation of the heritage asset.

The use of natural ventilation is not currently sufficient to reduce heat build-up to the office space. The host building is listed and opportunities to change layouts/orientations/ceiling heights, or increase thermal masses are highly limited. In addition, the presence of the busy highway fronting the site means that passive ventilation is not only potentially harmful in terms of air quality but also in terms of noise ingress.

The scope for passive measures to control excess heat at the property, given its heritage constraints, is therefore limited. Given this context, it is considered that the proposal for the split units is acceptable in this instance.

## **Summary**

As set out in this letter, the proposed plant is discreetly located and screened to ensure no harm to the character and appearance of the surrounding area or to the fabric of the listed building. The works do not raise any adverse noise impact issues on neighbouring properties and the need for cooling is paramount to ensure the operational requirements of the building are met. This ensures the long term maintenance of the building and creates the appropriate environment in facilitating a strong, competitive economy.

The internal works are considered to have an acceptable impact on the character and appearance of the listed building and the surrounding Conservation area. The development is in accordance with the relevant Development Plan policies, and it is therefore respectfully requested that planning permission and listed building consent are granted.

I trust this letter and the enclosed documents provide you with sufficient information to determine the applications but if you require any points of clarification or have any questions, please do not hesitate to contact me.

Yours faithfully

**Allen Sacbucker**  
**Associate**  
**SM Planning**