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Dear Edward,

PLANNING STATEMENT ADDENDUM

APPLICATION REFERENCE: 2023/4334/P

LONDON SCHOOL OF HYGIENE AND TROPICAL MEDICINE, 15-17 TAVISTOCK PLACE, LONDON, WC1H 9SH

Further to our recent email correspondence, we write on behalf of our client, the London School of Hygiene and Tropical Medicine (LSHTM), to formally submit revised plans to amend the rooftop strategy and plant proposals. These plans have been submitted in response to our ongoing dialogue regarding the Council and Conservation Officer's comments regarding the impact on the roof top plant and its associated screening on the surrounding streetscape and setting of the Conservation Area.

The revised plans and drawings supersede the plans which were submitted in the original application. The revised plans and information comprise the following suite of documents:

- Appendix A (Rooftop Studies) prepared by Rivington Street Studio;
- Application Plans and Drawings prepared by Rivington Street Studio including:
 - Roof Proposed Plan (Drawing number 1215 Revision PL03);
 - Proposed South Elevation (Drawing number 1401 Revision PL03);
 - Proposed South Elevation (Drawing number 1402 Revision PL03);
 - Proposed North Elevation (Drawing number 1403 Revision PL03);
 - Proposed North Elevation (Drawing number 1404 Revision PL03);
 - Proposed East Elevation (Drawing number 1405 Revision PL03);
 - Proposed East Elevation (Drawing number 1406 Revision PL03);
 - Proposed West Elevation (Drawing number 1407 Revision PL03);
 - Proposed West Elevation (Drawing number 1408 Revision PL03);
 - Proposed South Elevation (Drawing number 1411 Revision PL03);
 - Proposed North Elevation (Drawing number 1412 Revision PL03);
- This Cover Letter prepared by LSH;
- Design and Access Statement Part 1 of 2 prepared by Rivington Street Studio;
- Design and Access Statement Part 2 of 2 prepared by Rivington Street Studio;

- Document Register and Issue Sheet; and
- Heritage Statement prepared by Conservation Planning.

Please treat all previous version of the above plans as withdrawn.

The Proposals

The description of the proposed development that the detailed planning application is seeking permission remains as follows:

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

The proposed development comprises an external plant solution to accommodate increased occupation and concentrations of people in specific spaces for set periods including Air Handling Units (AHUs) and Air Source Heat Pumps (ASHPs) at roof level which will be contained within new screening set back from the roof. The primary aim of the proposals is to support energy efficiency and low carbon heating improvements to the existing building.

The consultation response received to the original proposals detailed concerns that the roof top plant and associated screening would be visible in views and therefore should be located further towards the rear of the roof to minimise its visibility. As such, the design team has undertaken several further studies where have tested various screening options to assess the visual impact on the surrounding streetscape and conservation setting and establish the optimum location where there would be minimum impact on townscape. The design study also considered the suggestion that a faux mansard type enclosure could be acceptable as well as reviewing alternative ways to help reduce and conceal the amount of plant that is visible at roof level. The Design Option sketches were therefore reviewed by the full team and the LSHTM, and a summary is set out in the Design and Access Statement Appendix A. The tested options include the omission of the western screen, lowering of metal louvered screen and the installation of a faux mansard screen.

Having assessed each option in detail, the design team concluded that the omission of the western screen option would result in the most sustainable scheme whilst minimising visual impact, and any perceived harm to the Conservation Area. Consequently, the DAS sets out that the revised proposals are for amendments including lowering of some of the ductwork and the omission of the south-west screen as it was considered that this option would result in the most sustainable scheme whilst minimising visual impact and perceived harm to the Conservation Area.

As set out within the DAS and shown on the elevation plans, the revised rooftop plant proposals will therefore comprise the following components:

- The plant will be positioned back from the street façade as far as feasible;
- Consolidation in massing terms with the TP2 plant;
- The plant will be split into several smaller units rather than one large unit to reduce height; and
- Elements with the loudest acoustics will be located at the centre of the scheme as far from the receptors as possible;

Planning Justification

The proposed amendments to the scheme, result in a proposal that accords with national, regional and local plan policy and will deliver a scheme that will enable the school to expand their operations and provide increased teaching space and welfare facilities. It is considered that the revised proposals are the best possible solution that will help achieve a more sustainable building whilst having negligible impact upon the setting of the Conservation Area and the views at street level.

Heritage

The amended Heritage Statement confirms that the impact on the character and appearance of the Bloomsbury Conservation Area would also be negligible.

The updated Heritage Statement also concludes that the proposed building services plant and screen wall would sit towards the rear of a flat roof structure of no architectural or historic interest. From street level along Tavistock Place, the plant and screen wall would be almost invisible. Only limited views of the plant screen wall would be glimpsed particularly beyond the corner with Herbrand Street. The parapet wall would continue to provide a clean, unbroken termination to the building's front elevation.

In arriving at the preferred design option for the roof plant, it was considered that a faux mansard would not sit well on a host building of this character, as it would create a feature which is not characteristic of the properties in the immediate vicinity or typical for buildings of this age. In line with Local Plan Policy D2 (Heritage) development in Conservation Areas should preserve or enhance the character of Conservation Areas. A building of this age would not usually have a double mansard and therefore we considered that the faux mansard could have a more adverse architectural impact on the Conservation Area and the host building, 15-17 Tavistock Place compared to a lowered screen option. Consequently, the faux mansard option has been considered in detail but had to be discounted due to the adverse impacts on carbon, the scheme budget and the host building itself.

The impact on the appearance of the Conservation Area from glimpsed views would be de-minimus. No harm would be caused to the attributes of the Bloomsbury Conservation Area that make it special.

Sustainability

Paragraph 164 of the NPPF states that *'in determining planning applications, local planning authorities should give **significant weight** to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic.'* The paragraph further goes on to state that *'where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in chapter 16 of the framework.'*

The proposals have also been considered Local Plan Policy CC1 (Climate Change Mitigation), which states that the Council will require all developments to minimise the effects of climate change. One of the main aims of the scheme is to decarbonise the LSHTM estate and achieve net zero by 2030, accordingly the School has secured £250,000 Salix funding towards carbon reduction in the TP1 project. The faux mansard option is a much heavier structure, which would require increases to steelwork to deal with the angle and therefore comprise of more material, which in turn would result in greater embodied carbon. Moreover, the mansard would add structural elements which would require a re-design phase which would increase the length of construction works and consequently traffic, which would adversely impact on carbon. The faux mansard option would also take the scheme over budget and therefore it may become unviable.

Taking the above into consideration, our preferred option would therefore be to amend the roof level plant and ductwork and omit the western screen. This option would not only be the best structurally and in terms of reducing embodied carbon and programme length, but the visual impact from in the view looking east would be negligible.

Amenity

Noise impact will be kept to a minimum with the loudest acoustics located to the centre of the scheme and plant screening to reduce noise impact. It is therefore considered that the proposals accord with Local Plan Policy A4 (Noise and Vibration).

The proposed height of the plant is below the roof line of TP2 which itself was evidenced at the time of the original application to be considerably lower than the view cone and will therefore have no impact on

the protected vista between Primrose Hill and St Pauls Cathedral in line with London Plan Policy HC3 (Strategic and Local Views).

Public Benefits

In accordance with the NPPF it is necessary to consider any perceived heritage harm against the public benefits, including:

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. It is considered that this option will have the best structural impact rather than a faux mansard solution which would incorporate more heavyweight materials and result in more embodied carbon.
2. **Enhanced Appearance** The proposed design amendments to the gates and the introduction of planters adjacent to the entrance of the building will enhance the appearance of the building and seek to preserve and enhance the character and setting of the Conservation Area.
3. **Improve Wayfinding:** The proposed introduction of new building signage above the building's main entrance, will improve wayfinding to the site for both students and staff.
4. **Respect Character and Context:** The revised proposals will preserve the character and context of the Bloomsbury Conservation Area and have no impact on the design and character of neighbouring properties or their amenity.
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.

Summary

The proposals will deliver a more sustainable building that reduces embodied carbon which is necessary as part of LSHTM's decarbonisation strategy, whilst protecting the setting of and harm against the Bloomsbury Conservation Area. Moreover, the proposed reduction in height of the plant enclosure will reduce the visibility of the enclosure in long views and a street level meaning there will be a negligible impact on the views of the protected vista. Additionally, it was concluded that this would be the best option structurally and in terms of reducing embodied carbon and programme length.

The development proposals will also improve the buildings sustainability credentials and 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), which is a public benefit that should be afforded **significant weight**. There are also a significant number of public benefits associated with the application that would outweigh any perceived heritage harm.

Overall, the proposed revised scheme is considered to accord with the Development Plan and will give rise to a significant number of planning benefits. The updated proposals therefore align with the requirements of Camden's Local Plan and we thus consider that the proposed design amendments and the proposed sustainability strategy are acceptable and should be considered so by the Council.



If you have any queries, please do not hesitate to contact myself or my colleague Connie Longrigg

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Yours sincerely

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Head of Planning – London & South
For Lambert Smith Hampton

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Enc.

c.c. Sally Karrar, London School of Hygiene and Tropical Medicine