

JE/GF/PD11351  
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17<sup>th</sup> September 2017

Planning and Development Control  
Camden Council  
5 Pancras Square  
London  
N1C 4AG

## F.A.O CHARLES THUAIRE

Dear Sirs,

**15 – 17 TAVISTOCK PLACE, CAMDEN, WC1H 9SH  
APPLICATION FOR SECTION 73 - MINOR-MATERIAL AMENDMENT TO PLANNING PERMISSION  
REFERENCE 2015/3406/P, APPROVED ON 27<sup>th</sup> JANUARY 2017**

We write on behalf our client, The London School of Hygiene and Tropical Medicine, to seek approval of minor-material amendments to planning permission ref. 2015/3406/P, which was approved by Camden Council on 27<sup>th</sup> January 2017. The nature of the changes proposed are summarised below and set out in detail on the drawings that accompany this submission.

The following documents accompany this application:

- Proposed replacement drawings prepared by BMJ Architects (please refer to Drawing Schedule TP1 submitted with this application);
- All documentation submitted in support of planning approval ref. 2015/3406/P;
- Addendum Planning Statement (this letter) prepared by Montagu Evans;
- Addendum Design and Access Statement prepared by BMJ Architects;
- Area Schedules prepared by BMJ Architects (within Addendum D&AS);
- Addendum Statement of Community Involvement prepared by Vicky Ratcliffe – Communities Specialist;
- Noise Statement prepared by BDP;
- Addendum Historic Environment (Archaeological) Assessment prepared by MOLAS;
- Air Quality Assessment prepared by Peter Brett Associates;
- Transport Statement and Travel Plan prepared by Wilde Carter Clack;
- Waste Strategy (within the Addendum D&AS) prepared by BMJ Architects;
- Construction Management Plan prepared by Wilde Carter Clack;
- Addendum Ecology Report prepared by Wild London;
- Energy Statement prepared by BDP;
- Sustainability Statement prepared by BDP;
- Addendum Sustainable Urban Drainage Statement by Wilde Carter Clack;
- Sunlight and Daylight Report prepared by GVA Schatunowski Brooks.

## Background

Leading scientists at the London School of Hygiene & Tropical Medicine conduct cutting-edge research on major health challenges which affect us all, and the scheme will be instrumental in accelerating the development of new treatments for the prevention and control of infectious diseases.

The new laboratories are an important part of the School's wider estate strategy, including the refurbishment of existing laboratories in Keppel Street ensuring there are advanced facilities throughout the institution. The activities on the two sites will complement and enhance each other to maximise real-world impact and find creative solutions to help people and patients.

The proposals will be for the sole use of the London School of Hygiene & Tropical Medicine, though they will continue to work closely with their colleagues at University College London. The main difference between the permitted scheme and the proposals put forward now is the absence of live specimens and the use of the space as 'dry' laboratories where research is conducted using computer models. It has therefore become necessary to amend the scheme to reflect this new position.

### **Proposed Amendments**

The revised building will provide custom-built, well-resourced facilities serving as the engine room for researchers to analyse, investigate and scrutinise large amounts of data; though the 'dry' laboratories now proposed mean space requirements are reduced (resulting in a smaller basement) and the high levels of air-management and containment are no longer necessary.

BMJ Architects have produced a revised set of drawings (listed in Drawing Schedule TP1) that detail the proposed changes. In summary, these include:

- Reduction of basement to a single storey over half the footprint only;
- Removal of flue stacks, reducing overall height of proposals and their visibility;
- Atrium / lightwell introduced, facilitating light through the centre of the building's floorplates with amended rooflight profile to suit;
- Level 3 accommodation changed from plant room to research space;
- Glazing introduced to Level 3 research spaces;
- Level 4 plant room and associated louvres in external wall reconfigured;
- Rationalising of cores appropriate to proposed use, with increased WC provision;
- Relocation of Substation & LV switch room;
- Retention of current use of accommodation on ground floor of western wing of existing building;
- Pend created into internal courtyard to allow vehicular access to LV switch room;
- Relocation of accessible parking into re-landscaped courtyard;
- Clarification of location for photovoltaic panels.

Montagu Evans and BMJ Architects met with Officers on Friday 15<sup>th</sup> September to explain the proposed revisions. Officers confirmed that the proposals appeared acceptable in planning terms and that they could be appropriately dealt with as minor-material amendments (via Section 73 of the Act).

### **Policy Assessment**

This application seeks minor-material changes to a scheme that already benefits from planning permission. The proposed changes have been agreed with Camden Council Officers as being minor-material in nature and do not therefore, by definition, have a significant effect on the nature of the scheme or the impacts it creates. The following analysis, dealing only with the proposed changes, must therefore be read in this context.

Since the extant planning permission was granted, Camden have adopted their new Local Plan (July 2017). Whilst the document introduces a variety of policy changes, the approach to aspects relevant to these proposals remains broadly similar to that of the previous policy regime. On this basis we consider all aspects of the scheme that are permitted and unchanged by this application remain acceptable in planning terms.

In the analysis below each of the changes is assessed against the requirements of relevant plan policy.

### *Basement Reduction*

The approved scheme includes a two storey basement covering the full footprint of the building. This application seeks to reduce that, reflecting the reduced need for plant accommodation, to a single storey covering only half the footprint of the building (which remains unchanged).

This application includes a fully updated Ground Investigation and Basement Impact Assessment that demonstrates the revised basement complies with the requirements of Local Plan policy A5 – Basements and Camden Planning Guidance 4. We note that having demonstrated a basement of nearly four times the floor area and twice the depth would be acceptable in planning terms, it follows the smaller proposal can be made to do the same.

We expect the Basement Impact Assessment will be audited by Camden Council's own Structural Engineers with whom we will work constructively to provide any additional information that may be required.

### *Removal of flue stacks*

As the building will be used as 'dry laboratories' there is no longer the need for high level containment measures and air handling systems. As such the tallest of the permitted flues have been removed from the scheme. This element of the building was the only part previously visible from the public realm, the Conservation Area and the settings of listed buildings (those on Cartwright Gardens in particular). The flues' removal therefore, whilst they were acceptable previously in any case, is a clear reduction in visual impact. Computer generated images of the permitted and revised proposals are provided in the addendum Design and Access Statement.

Our conclusion is that the change can only assist the proposals in preserving the character and appearance of the Conservation Area, the settings of nearby Listed Buildings and other Designated and Non-designated Heritage Assets. This being the case the proposals continue to meet with the requirements of the National Planning Policy Framework and Camden's Development Plan (Local Plan policies A1, D1, D2 and Camden Planning Guidance 1, in particular).

### *Insertion of Windows*

The proposed changes include using the third floor accommodation as laboratory / write-up space, whereas previously it was a plant room. This has produced the need for windows at this level, in the north eastern and western elevations. BMJ Architects provide analysis of these new windows in their Addendum Design and Access Statement with a particular focus on avoiding amenity issues with neighbouring residential dwellings.

The windows are over 19 metres from neighbouring properties and set back from lower level parapets to such an extent that we conclude the windows do not present undue overlooking and / or loss of privacy. We are therefore of the view that the windows meet with the requirements of Local Plan policies A1 – Managing Impact of Development, D1 Design and Camden Planning Guidance 1.

### *Addition of Smoke Reservoir*

Due to a revised fire strategy it has become necessary to accommodate a smoke reservoir at fourth floor level. This change manifests in a modest increase in bulk in this location (made clear in BMJ's Design and Access Statement).

Primarily because the change is so minor, we are of the view that it does not materially affect the building's visual impact in any way. The change has also been assessed for sunlight and daylight impacts (see the updated Sunlight and Daylight Report prepared by GVA Schatunowski Brooks) and is shown not to cause any material change to the impacts already confirmed as acceptable in planning terms.

This change too therefore, in our view, complies with Local Plan policies A1 – Managing Impact of Development, D1 Design and Camden Planning Guidance 1 and is acceptable in planning terms.

*Increased Occupancy / Highways / Cycle Parking*

Whilst of a considerably reduced size, due to the basement reduction, the building will be occupied by more staff than previously anticipated. Wilde Carter Clack have provided a revised Transport Statement and Travel Plan to reflect this change and have concluded that the proposals remain in accordance with plan policy. Please refer to these documents for a detail explanation of how this conclusion has been reached.

*Conclusion*

The proposals are minor-material in nature and as such they are appropriately dealt with via Section 73 of the Town and Country Planning Act 1990 (As amended), as discussed pre-application with officers.

The proposals have very little effect on the nature of the permitted building, its relationship with its context and all other possible impacts it may produce. What difference these changes do make has been assessed above as being either so minor as to not make a material difference to any impacts or as having the effect of reducing the proposals' impact e.g. the reduced basement and removal of the flues.

We conclude therefore that the proposed changes, and the proposals as a whole, accord with Camden's Development Plan and the very recently adopted Local Plan (2017) and longer standing Camden Planning Guidance documents.

A cheque made payable to Camden Council for £195 to cover the Application Fee will follow shortly. The application has been submitted online via the planning portal (**PP- 06473861**), and a digital version of the submission has been sent to Camden Council Planning and Development Control, marked under the planning portal reference of the submission.

We trust this information is sufficient for you to validate the application. However, if you do require any further information please do not hesitate to contact Gareth Fox or Anthony Brogan of this office.

Yours faithfully,

*MONTAGU EVANS LLP*

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