

THE LONDON SCHOOL OF
HYGIENE AND
TROPICAL MEDICINE

AND

UNIVERSITY COLLEGE LONDON

BLOOMSBURY RESEARCH
INSTITUTE
15 – 17 TAVISTOCK PLACE
LONDON
WC1H 9SH

PLANNING STATEMENT

JUNE 2015

5 Bolton Street

London

W1J 8BA

Tel: 020 7493 4002

Fax: 020 7312 7548

www.montagu-evans.co.uk

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1.0 Introduction

1.1 This Planning Statement has been prepared by Montagu Evans LLP to accompany an application for planning permission by the London School of Hygiene and Tropical Medicine (“The School”) and University College London (“UCL”) for the redevelopment of ancillary buildings to the rear of 15 – 17 Tavistock Place.

The Project

1.2 The Bloomsbury Research Institute is a joint initiative between The School and UCL. The purpose is to develop a global centre of excellence for research into new modes of disease detection, treatment and control.

1.3 Both institutions have a world-class record for fundamental and clinical research, with particular expertise in microbial pathogens.¹ These include antibiotic-resistant strains of bacteria and new and emerging viruses. As a group, these infectious diseases remain the leading cause of child and adolescent deaths, and one of the leading causes in adults. According to the World Health Organisation, communicable diseases are responsible for sixteen per cent of all deaths each year.

1.4 The Institute would provide purpose-built laboratory space in the heart of Bloomsbury, capable of supporting forty principal investigators and over two hundred scientists. This would significantly build and strengthen London’s research capacity and the ability of the two institutes to attract and retain world-class scientists and clinicians.

1.5 The Project would lead global efforts to find new drugs, vaccines and diagnostics to tackle infectious diseases and address antibiotic resistance.

1.6 In addition to The School and UCL, the principal funders include the following organisations:

- The World Health Organisation
- The Wellcome Trust
- The Bill & Melinda Gates Foundation
- The Higher Education Funding Council



1.7 Locating the new Institute in Bloomsbury will further sustain the London Borough of Camden’s leading position as a hub for biomedical research and it would enable the project to build partnerships with nearby world-class research centres, such as the Francis Crick Institute, and allow research partnerships with major London hospitals.

¹ UCL came top in the Government’s latest Research Excellence Framework (REF) 2014, with the highest overall research power. LSHTM was ranked as having the top volume of world-leading research staff.

The Proposed Development

- 1.8 The proposed development will provide a custom-built, high-specification research facility in the heart of the Mayor's MedCity Enterprise Zone, which now hosts the highest density of biomedical research in Europe.
- 1.9 A number of locations were considered for the Project and, after a careful and rigorous review, this site was identified as being the best and most appropriate (see **Annex I**).
- 1.10 The application site is ideally located in close proximity to many other essential cognate research institutes.
- 1.11 The planning application proposes a new-build facility on the land to the rear of 15 – 17 Tavistock Place, with minor works to the extant building fronting Tavistock Place.
- 1.12 The planning application seeks planning permission for:

Demolition of shed buildings to allow for the erection of a medical research laboratory and higher education facility with associated plant (D1 – Non-Residential Institutions).

Pre-application Engagement

- 1.13 In anticipation of a planning application to redevelop this site, the Bloomsbury Research Institute sought early engagement with the London Borough of Camden ("LB Camden") to seek their advice during the design process. This was formalised through a Planning Performance Agreement (PPA, see **Annex II**).
- 1.14 Whilst undertaking extensive engagement with Officers, the Bloomsbury Research Institute also undertook pre-application public consultation to understand the priorities and key issues for local people, their elected representatives and other key local and national stakeholders. This consultation involved four public exhibitions and numerous individual meetings and these are discussed in the **Statement of Community Involvement**.
- 1.15 Changes to the scheme have been introduced in response to comments raised throughout the pre-application consultation period. The evolution and adaptation of the proposed development is described in the **Design and Access Statement** prepared by BMJ Architects.
- 1.16 The Bloomsbury Research Institute project team will continue to engage with all of the above parties following submission of this application.

Purpose of the Planning Statement

- 1.17 The purpose of this Planning Statement is to provide the necessary information to allow for an informed assessment of the development proposals against relevant national, regional and local planning policy and other material considerations. The Statement sets out how the relevant planning policies and other key material considerations to the determination of the application have been taken into account. This assessment brings together the findings of the technical reports identified below and, having regard to these, provides a balanced planning judgement on the merits of the proposals.
- 1.18 The scope of supporting information has been established with regard to national and local list requirements, alongside officer feedback during the course of PPA pre-application engagement with LB Camden Officers. The schedule of documents is set out in **Table 1.1** below.

Table 1.1 – Schedule of Planning Application Documents

Title	Author
Cover Letter	Montagu Evans
Application Form (<i>this incorporates Fee Cheque and Ownership Certificates</i>)	Montagu Evans / LSHTM / UCL
CIL Forms	Montagu Evans
Site Location Plan	BMJ
Existing Block Plan	BMJ
Demolition Drawings	BMJ
Existing Elevations, Floor Plans and Sections	BMJ
Proposed Elevations, Floor Plans and Sections	BMJ
Design and Access Statement	BMJ
Planning Statement	Montagu Evans
Statement of Community Involvement	LSHTM
Daylight and Sunlight Report	GVA
Acoustic Report	BDP
Archaeological Report	MOLAS
Transport Statement	Wilde Carter Clack
Townscape, Heritage and Visual Impact Study (<i>this incorporates verified views</i>)	Montagu Evans Hayes Davidson
Waste Management Statement	BMJ Wilde Carter Clack
Sustainability and Energy Statement	Bloomsbury Research Institute Parsons Brinckerhoff
Construction Management Plan and Construction Traffic Management Plan	Wilde Carter Clack MACE

- 1.19 This Planning Statement demonstrates that the proposed scheme:
- strengthens London’s research capacity and delivers substantial public benefit through the accelerated development of new treatments and solutions for the prevention and control of virulent microbial pathogens;

- makes a major contribution to addressing fundamental planning policy objectives, through the provision of a custom-built research facility in the core of the Mayor of London's MedCity Enterprise Zone;
- has been prepared within the context of - and informed by - detailed consultation with the local planning authority, the surrounding community and other key stakeholders, responding to comments raised at the pre-application stage by officers and all other interested parties;
- is consistent with the current lawful land use for this site;
- has regard to relevant planning policy at the national, regional and local level and other relevant material considerations;
- would, through the delivery of a world-class research facility, make best use of a brownfield site;
- delivers a high quality development that enhances the character of the Conservation Area, compliments the surrounding built environment and has regard to the setting of nearby listed buildings; and
- constitutes sustainable development in line with the criteria set out in the NPPF, by delivering economic, social and environmental benefits.

Environmental Impact Assessment

1.20 The Town and Country Planning (Environmental Assessment) (Amendment) Regulations 2015 raised the screening threshold for "urban development projects" to those comprising a site area of greater than 5 hectares (Paragraph 10(b) of Schedule 2). The site falls below the statutory screening threshold for non-sensitive land, and the proposals would not have a significant urbanising effect. Confirming this, the local planning authority issued a negative opinion (Ref: 2015/2359/P) on 8 May 2015 stating that an Environmental Assessment is not required for this proposal (**Annex III**).

Structure of this Statement

1.21 This Statement explains the proposed development in the context of the statutory Development Plan and other material considerations.

1.22 It does not deal with every consideration in depth, as that is the role of individual experts' reports and studies. It does, however, signpost these other reports and studies where applicable.

1.23 In **Section 2.0** of this Statement we start by describing the site and the immediately surrounding area. As part of this consideration, we also set out the site's relevant planning history as available on LB Camden's online planning register.

1.24 The development proposals are set out in **Section 3.0**.

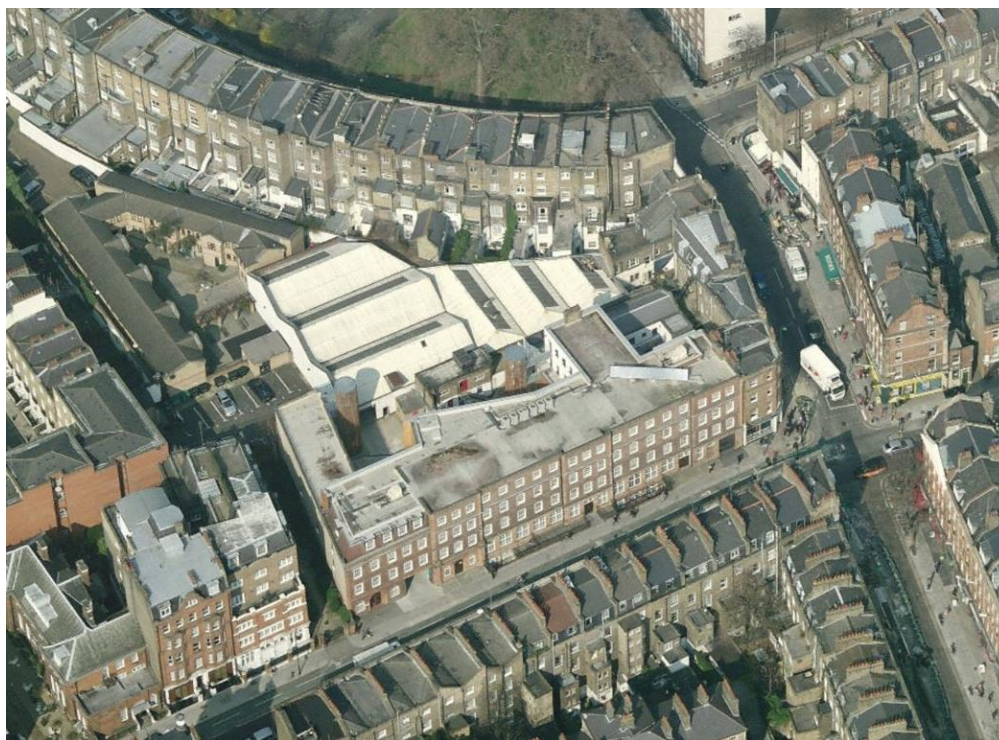
- 1.25 At **Section 4.0** we describe the planning policy context and set out which policies are applicable to the proper planning assessment of the site and the development proposals.
- 1.26 **Section 5.0** presents an analysis of the proposed development against the relevant planning policies and associated guidance. This includes an examination of the baseline conditions and existing site constraints that informed the design process from the outset.
- 1.27 **Section 6.0** deals with Mayoral and Borough Community Infrastructure Levy, section 106 obligations and planning conditions.
- 1.28 Our conclusions on the overall acceptability of the proposals are drawn at **Section 7.0**.

2.0 THE SITE AND SURROUNDINGS

The Application Site

- 2.1 The application site extends to approximately 0.303 hectares (0.749 acres) and is situated within the town planning jurisdiction of the London Borough of Camden. An aerial view of the site below (**Figure 2.1**) demonstrates the built context within which the development would be sited.

Figure 2.1 – Aerial Photograph of Site



Source – www.bing.com

- 2.2 The site is located to the rear of buildings fronting Tavistock Place in the King's Cross ward area. Being of a roughly triangular shape, the proposed development is located in the centre of a city block and as such is enclosed entirely by existing structures used for a variety of purposes. These purposes / uses include a pub (Use Class A4), residential (Use Class C3), hotels (Use Class C1) and education (Use Class D1). The block is defined by Tavistock Place (south), Marchmont Street (east), Cartwright Gardens (north) and Burton Street (west).
- 2.3 Vehicular and pedestrian access to the site is via an entrance from Tavistock Place (although gated such that vehicular access is prevented for the majority of the time) and from Marchmont Street, via a relatively narrow, part cobbled, access. At present, we note that the Lord John Russell public house uses this access for the purpose of customer seating. Notwithstanding the applicant's rights of access exist over this land, it is not proposed to use this route for access for the new development.

- 2.4 15 - 17 Tavistock Place is owned and run by The School and is in use as a D1 Non-residential Institution. The land to the rear of this building is currently occupied by a large warehouse structure, understood to have been previously used as a milk depot and garaging of Police vehicles. This structure is in use as D1 Non-residential Institution purposes (ancillary storage and cycle parking for 15 – 17 Tavistock Place) pursuant to permission Ref: 2009/0067/P. The history of the site is set out in detail in the **Townscape, Heritage and Visual Impact Study**.
- 2.5 A Public House, and residential properties, back onto the site along Marchmont Street.
- 2.6 Woolf Mews is a modern residential development that sits adjacent to the north-west boundary of the site. The proximity of these buildings to the proposed development area has guided a number of key design considerations including privacy, shadowing, enclosure and daylight and sunlight.
- 2.7 To the north of the site are a series of Grade II listed hotels. These buildings face onto, and form part of, Cartwright Gardens.
- 2.8 The surrounding area is characterised by a mix of buildings, with structures of varying heights and architectural styles. Further details about the urban grain and built form context surrounding the application site are provided in the **Design & Access Statement**.

Heritage Assets

- 2.9 The site is located within the Bloomsbury Conservation Area. The Bloomsbury Conservation Area Appraisal and Management Strategy (2011) places the site within Sub Area 13: Cartwright Gardens / Argyle Square.
- 2.10 Paragraph 5.238 of the Conservation Area appraisal states:
- “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. Elsewhere there is a predominance of red brick and ornate detailing, as found in the larger scale mansion blocks of the later 19th century. Of special architectural interest is the former Mary Ward Settlement building, which is grade I listed. It was built as an institute in the late 1890s in an advanced Arts and Crafts manner by Alan Dunbar Smith and Cecil Brewer, and consists of three storeys with basements and attics, and a roughly symmetrical façade of red brick and rough render, with overhanging eaves, small-paned timber casement windows, and an off-centre entrance porch with a square overhanging roof.”*
- 2.11 There are no statutorily or locally-listed buildings on the site. There are, however, a number of listed buildings in the surrounding area.

- 2.12 The impact of the presence and proximity of these buildings / heritage designations on the development potential of the site are considered later in this Statement and dealt with in detail by the **Townscape, Heritage and Visual Impact Study**. The architectural design response to these important considerations is also further explained in the **Design and Access Statement**.

Site Planning History

- 2.13 We have reviewed the available online planning records of LB Camden.
- 2.14 Whilst a number of minor applications relating to the site and surrounding buildings have been made, the 2009 permission Ref: 2009/0067/P is of particular relevance to this application. This permission allowed for the following development across the whole site.

Change of use and works of conversion from offices (Class B1) to flexible business / non-residential institution floorspace (Class B1 / D1) plus alterations and extensions including the erection of a four storey rear extension in courtyard, replacement of windows, provision of external stairwells to the rear of the site, alterations to the main entrance and rear elevations, and landscaping of the courtyard.

- 2.15 This permission has since been implemented in full.

3.0 The Development Proposals

- 3.1 The aim of this application is to deliver a world-class biomedical research facility in the most appropriate location to help address some of the world’s most pressing health needs.
- 3.2 The design team has sought to achieve a scheme that is physically capable of delivering this aspiration, whilst having careful regard to the needs of local residents and local businesses, as well as the character of the Bloomsbury Conservation Area and the setting of nearby listed buildings.
- 3.3 The design response to these issues is explained in the **Design and Access Statement** which accompanies the application.
- 3.4 The design went through a series of iterations and changes informed by extensive engagement with Officers and feedback from key stakeholders. The comments received throughout pre-application engagement informed the evolution and refinement of the proposed scheme.
- 3.5 The finalised schedule of proposed floorspace is set out in **Table 3.1** below.

Table 3.1 – Schedule of Floorspace

Existing Floorspace (GIA sq m)	Floorspace to be demolished (GIA sq m)	New Floorspace (GIA sq m)	Net Additional Floorspace (GIA sq m)
4918	1362.9	5474	4111.1

Source: *BMJ Architects*

- 3.6 The proposed development will be car free, though two spaces would be provided solely for the use of disabled persons.
- 3.7 The proposals include the provision of cycle parking in accordance with the requirements of the London Plan (2015) and LB Camden’s local standards. A total of 64 spaces would be provided across the site, providing secure parking for staff and visitors to the Bloomsbury Research Institute.

4.0 Planning Policy and Other Relevant Considerations

The International Imperative

- 4.1 The World Health Organization directs and coordinates international health within the United Nations' system. A fundamental priority for the organisation is to increase the prevention, treatment and care for infectious diseases. International NGOs, too, promote clinical research programmes to combat infectious diseases. This includes organisations like the Bill & Melinda Gates Foundation, which assess projects and fund those which are considered to be essential for improving global health.
- 4.2 The WHO works with Member States to enhance cross-country collaborations on public health and to promote research into pathogens and the dynamics of infectious diseases in global populations.

The National Need

- 4.3 Biomedical sciences are one of the country's most significant and productive sectors. In addition to its contribution to the health needs of local and global populations, a strong medical research base generates substantial benefits for the United Kingdom's economy and knowledge economy. It can also have value as an instrument of foreign and international development policy by increasing cross-country collaboration and enhancing global resilience to infectious diseases.
- 4.4 Government policy seeks to make the United Kingdom the best place in the world for medical research and development. The Government's latest science and innovation strategy (2014) emphasises "*the need to accommodate and foster higher levels of collaboration between disciplines, sectors, institutions, people and countries*". It also recognises the importance of place, "*where people and organisations benefit from mutual proximity*". The strategy states that the United Kingdom must be able to respond quickly and effectively to emerging infectious diseases.
- 4.5 At the national level, England's town and country planning system is configured to facilitate a coordinated spatial approach to the provision of the new research facilities required to support the Government's science and innovation strategy.

London-Wide Context

- 4.6 The Mayor's 2020 Vision states that "*London has one of the world's most powerful and innovative biosciences and health sectors*".
- 4.7 The Mayor's polices – for example the 'Med City' initiative, launched in April 2014 – are designed to strengthen London's cluster of research institutions and its biosciences expertise. The 2015 London Plan seeks to ensure that London retains and extends its global role as a hub for health-related research.

- 4.8 At all levels of policy, there is strong support for the delivery of medical research facilities and a recognition that spill-off and collaboration benefits are maximised when academic and health science expertise is clustered.
- 4.9 The proposals set out in this application are driven by the pressing need for a new dedicated research facility in London for the Institute. The scheme itself was formulated having regard to adopted and emerging Development Plan policies and associated guidance, and following extensive dialogue with local planning Officers and key stakeholders.
- 4.10 This Section of the Statement provides a summary of the planning context from which policy is drawn. We do not provide a verbatim account of all relevant policy, as this is dealt with in **Section 5.0** which provides an assessment of the application proposals against the policies and guidance contained within the documents identified in this Section.

The Statutory Development Plan

- 4.11 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise.
- 4.12 As set out earlier in this Statement, the site lies within the administrative jurisdiction of the London Borough of Camden. LB Camden's Local Plan currently consists of the 2010 Core Strategy, the 2010 Development Policies document and the 2013 Site Allocation Plan.
- 4.13 On 10 March 2015, the Mayor published (i.e. adopted) the Further Alterations to the London Plan (FALP). From this date, the FALP are operative as formal alterations to the London Plan (the Mayor's spatial development strategy) and form part of the Development Plan for Greater London.
- 4.14 The statutory Development Plan for the site thus comprises:
- London Plan (Consolidated with Alterations since 2011) (2015);
 - LB Camden's Core Strategy (2010);
 - LB Camden's Development Policies (2010); and
 - LB Camden's Site Allocation Plan (2013).

Site-specific Policies

- 4.15 The Council's Policies Map, which shows site allocations and other planning designations, was adopted in 2010. It therefore pre-dates the publication of the National Planning Policy Framework ('NPPF') in March 2012.

4.16 The Policies Map, an extract of which is at **Figure 4.1**, identifies the site as being within the:

- Bloomsbury Conservation Area;
- Central London Area (Clear Zone Region);
- Central Activities Zone; and
- Designated Primrose Hill Summit to St Paul's Cathedral View 4A.1.

4.17 There are no site-specific designations. We note, however, that 15 – 17 Tavistock Place was subject to a proposed allocation in the Issues and Options Consultation for the Council's Site Allocation Development Plan Document (October 2008). This allocation sought to guide the provision of additional space in connection with the LSHTM operations, although it was removed from subsequent consultation documents because the 2009 permission (Ref: 2009/0067/P) demonstrated a clear intent by The School to pursue a D1 use on the whole site, including the sheds to the rear of the site.

4.18 One must therefore look at the local planning authority's general priorities and policies to see what considerations are likely to be engaged by proposals to redevelop the site. General policies relating to the proposed development will be noted in **Section 5.0**.

Figure 4.1 – Extract from LB Camden's Policies Map, 2010



Source: www.camden.gov.uk

Other Policy Material Considerations

National Planning Policy

- 4.19 The National Planning Policy Framework (NPPF) was published on 27 March 2012. The NPPF sets out the Government's approach to planning matters, and is a material consideration in the determination of planning applications.
- 4.20 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through decision-taking (paragraph 14). In the context of decision taking, this means *"Approving development proposals that accord with the development plan without delay"*.
- 4.21 In assessing whether a development is 'sustainable', regard has to be had to all policies of the NPPF and how these sit in a wider balance of considerations. Three fundamental dimensions to sustainable development are set out at paragraph 7 of the NPPF, which require the planning system to perform a number of roles:
- *"an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;*
 - *"a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and*
 - *"an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy."*
- 4.22 In March 2014 the Government published the National Planning Practice Guidance (NPPG) which is a material consideration in relation to planning applications. The NPPG consolidates previous circulars and guidance into single source of guidance at the national level.

Supplementary Planning Documents and Supplementary Planning Guidance

- 4.23 The Mayor of London has published a range of supplementary planning guidance that are material considerations in the determination of this application, for example:
- SPG: The control of dust and emissions during construction and demolition (July 2014);
 - SPG: Shaping Neighbourhoods: Character and Context (June 2014);
 - (Draft) SPG: Draft Social Infrastructure (May 2014);
 - SPG: London Planning Statement (May 2014);
 - SPG: London View Management Framework (March 2012);

- SPG: Sustainable Design and Construction (April 2014); and
- Draft SPG: Social Infrastructure (May 2014).

4.24 The LB Camden has also produced a substantial suite of planning guidance documents to assist applicants in the interpretation of local policy and the delivery of compliant schemes. Of particular relevance for this scheme are:

- CPG 1 Design;
- CPG 3 Sustainability;
- CPG 4 Basements and lightwells;
- CPG 6 Amenity;
- CPG 7 Transport; and
- CPG 8 Planning obligations.

Emerging Policy

4.25 LB Camden is currently preparing a new Local Plan that will, upon adoption, replace the Core Strategy (2010) and Development Policies (2010) documents.

4.26 The plan is in draft form and the local authority undertook an initial round of public consultation until 17 April 2015. The council intends to consult on a revised iteration of the draft Local Plan document later in 2015 before an examination in public is undertaken to determine if the document is sound.

4.27 The document is at its earliest stage of production and it was confirmed by LB Camden's Officers during the course of pre-application discussions that its draft policies will attract little or no weight.

4.28 At the time of writing this Statement, there had been no previous applications and there are no current applications to designate an area which includes the site as a Neighbourhood Planning Area. The Bloomsbury Neighbourhood Forum has produced a draft boundary map, which we understand was submitted to LB Camden in late 2014. The proposed boundary does not incorporate the application site at 15 – 17 Tavistock Place.

5.0 Assessment of the Proposed Development

- 5.1 This Section assess the component parts of the proposed development against the statutory Development Plan and other material considerations as outlined in **Section 4.0**. It explains why there is strong policy support for the proposed development.
- 5.2 It also identifies where existing physical or heritage constraints on or under the site were taken into account from the earliest stage of the building's design, and identifies how the proposed scheme responds accordingly. The following analysis draws from the various technical reports submitted with the application as identified in **Table 1.1**.

Site Selection

- 5.3 In order to determine the most appropriate location for the Bloomsbury Research Institute facility, The School and UCL undertook a careful analysis of potential sites. A summary of this review is provided in **Annex I** of this Statement.
- 5.4 The review identified 15-17 Tavistock Place as the most appropriate site for delivering the new Bloomsbury Research Institute facility.
- 5.5 The site is extremely well sited in close proximity to other essential cognate research institutes and a major teaching hospital.
- 5.6 The location of the Bloomsbury Research Institute facility on the land to the rear of 15 – 17 Tavistock Place is also supported from a policy perspective. The London Plan (2015) places considerable emphasis on attracting and retaining the research and innovation of London' "world-class universities and specialist institutions". **Policy 2.1** (*London and its Global, European and United Kingdom Context*) notes, for example, that the Mayor will ensure:

"that London retains and extends its global role as a sustainable centre for business, innovation, creativity, health, education and research, culture and art and as a place to live, visit and enjoy."

- 5.7 In particular, the London Plan references the Mayor's 2020 Vision and the importance of the growing cluster of academic health science expertise, known as the 'Med City'. The London Plan defines this concept as:

"An enterprise that brings together the life sciences sector in London and the greater south east in order to stimulate greater economic growth. There are several proposed medical and life sciences research districts in London including, but not exclusively, (1) around Euston Road including centres such as the University College Hospital, the Wellcome Trust and the Francis Crick Institute; (2) around Whitechapel, associated with the Queen Mary University London; (3) Imperial West at White City; (4) Canada Water, associated with King's College and (5) Sutton for Life, based around the Royal Marsden Hospital and Institute of Cancer Research."

5.8 **Paragraph 3.96** of the London Plan goes on to state that:

“The networks, research and facilities that support London’s role as a centre of medical excellence and specialist facilities, and their enhancements, will be supported.”

5.9 This vision is anchored by the provisions of **Policy 4.10** (*New and Emerging Economic Sectors*), which specifically identify the Bloomsbury precinct as a location of choice for the delivery of new facilities and workspace as required by London’s educational institutions.

5.10 Thus at a regional level, there is very strong policy support for the provision of additional research facility space where a need is identified by one of London’s key higher education institutions. In this case, there is a consortium of the world’s premiere research institutes seeking to deliver a new research facility that would significantly enhance their capacity to investigate and combat infectious diseases of worldwide significance.

5.11 It is also of critical importance to the success of the Bloomsbury Research Institute project that the building is sited in close proximity to other cognate research institutions and facilities. This will enhance the Bloomsbury Research Institute’s ability to recruit leading international researchers and it will enable the institute to undertake co-appointments with neighbouring organisations such as the Crick Institute and UCL Hospital. Moreover, it will encourage closer working with structural biologists (eg Birkbeck College), genome researchers (eg Wellcome Trust, Sanger Institute), and with population and computational biologists from The School and UCL. It is this agglomeration / spill-over effect that the aforementioned London Plan policies seeks to foster.

5.12 **Policy CS9** (*Achieving a successful Central London*) of LB Camden’s Core Strategy outlines that, within the Central London Area, the Council will ‘*support and promote the Central London area of Camden as a successful and vibrant part of the capital to live in, work in and visit*’ by, inter alia, “*support[ing] the concentration of medical, educational, cultural and research institutions within central London*”.

5.13 **Paragraph 10.7** of the Core Strategy also highlights the Council’s recognition regarding the importance of the higher and further education sector in the Borough.

5.14 In view of the practical and policy justifications for siting the proposed Bloomsbury Research Institute facility within the land to the rear of 15 – 17 Tavistock Place, The School and UCL proceeded to examine the feasibility of various building designs that could be accommodated at this location.

Existing Land Use

5.15 The whole site benefits from a flexible B1 Office / D1 Non-residential Institution use, by virtue of a planning permission granted in 2009 (Ref: 2009/0067/P). The shed structures provide storage that is ancillary to the current D1 use.

5.16 The proposed Bloomsbury Research Institute building incorporates laboratories, write-up space and areas reserved for administrative functions such as academic teaching

and research. To this end, the proposed development would fall within the D1 use class and no change of use is required as part of this scheme.

- 5.17 It is not feasible to incorporate residential uses within this application scheme, pursuant to **Policy DP1** (*Mixed use development*) of the 2010 Development Policies document. In considering whether it is appropriate to provide a mix of uses, the Policy expressly states that the Council will take into account:

*“a) the character of the development, the site and the area;
b) site size, the extent of the additional floorspace, and constraints on including a mix of uses;
c) the need for an active street frontage and natural surveillance;
d) the economics and financial viability of the development including any particular costs associated with it;
e) whether the sole or primary use proposed is housing;
g) whether secondary uses would be incompatible with the character of the primary use;
f) whether an extension to the gross floorspace is needed for an existing user;
h) whether the development is publicly funded;
i) any other planning objectives considered to be a priority for the site.”*

- 5.18 In every respect it is not considered appropriate to provide on-site housing at this site and nor would it be appropriate to make a payment in lieu. The Bloomsbury Research Institute is a publicly-funded project and a requirement to provide housing would fundamentally detract from the Institutes objective to deliver critical research and health objectives.

- 5.19 Moreover, the site does not have sufficient physical capacity to accommodate a mix of uses without compromising the Institute’s ability to deliver a purpose-built laboratory facility. The substantial wider public benefits of this project are considerations that weigh heavily against the general desirability of promoting mixed use schemes within the Borough.

The Historic Environment

Built Environment

- 5.20 There are no statutorily or locally-listed buildings on the site. It is, however, located within the Bloomsbury Conservation Area and lies within the setting of a terrace of Grade II listed buildings which are predominantly in hotel (C1) use.

- 5.21 In considering whether the proposed development is acceptable in heritage terms, the starting point for the local planning authority will be the statutory tests established by Section 66 (1) and Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- 5.1 Section 66 (1) (for planning permission when required) of the 1990 Act states that when determining applications, the local planning authority or the Secretary of State, ‘*shall have special regard to the desirability of preserving the building or its setting of any features of special architectural or historic interest which it possesses.*’

- 5.2 Section 72 (1) (General duty as respects conservation areas in exercise of planning functions) of the 1990 Act requires that, in the exercise of all planning functions,

special attention be paid to the desirability of preserving or enhancing the character or appearance of the area.

- 5.3 The design of the new research facility has been developed with an understanding of the contribution made by the buildings upon the site to the character and appearance of the Conservation Area. The new building seeks to preserve the contribution made by the site to the Conservation Area whilst delivering a new bespoke research facility, making the most efficient use of this back site location. To this end, consideration was given to 2010 Core Strategy **Policy CS14** (*Promoting high quality places and conserving our heritage*); 2010 Development Policies document **Policy DP25** (*Conserving Camden's heritage*); London Plan **Policy 7.8** (*Heritage Assets and Archaeology*); and **section 7** of the 2012 NPPF. The broad provisions set out in these policies and the associated guidance establish how the local planning authority can effectively manage the historic environment.
- 5.4 Chapter 7 of the London Plan sets out the Mayor's broad policies on a number of issues relating to London's places and spaces. Policy 7.2 (*An Inclusive Environment*) requires all new development in London to achieve the highest standards of accessible and inclusive design, while **Policy 7.4** (*Local Character*) states that "*development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings*". Part D of **Policy 7.6** (*Architecture*) states that buildings and structures should "*not cause unacceptable harm to the amenity of surrounding land and buildings*".
- 5.5 Respect for heritage assets is also required by **Policy 7.8** of the London Plan, which states that the Mayor and London Boroughs should seek to ensure that new developments conserve and, where possible, enhance the significance of heritage assets. At the local level, this is reinforced by **Policy CS14** (*Promoting high quality places and conserving our heritage*) of the Core Strategy which places an emphasis on high quality design that respects local context and character.
- 5.6 As set out in the **Design and Access Statement** and the **Townscape, Heritage and Visual Impact Study**, the applicants carefully researched the history of the site and the surrounding built environment to ensure that the building's proposed design and appearance is an appropriate response to this site and its context, whilst delivering the required floorspace and functionality of the new Lab building.
- 5.7 A detailed assessment of the contribution made by the existing buildings on site to the character and appearance of the Conservation Area is set out in the **Townscape, Heritage and Visual Impact Study** that accompanies this application. Any architectural and historic interest of the architecture on the site lies in the appearance and architectural style of the main building that fronts Tavistock Place. This building is considered to be an unlisted building that makes a positive contribution to the character and appearance of the Conservation Area. This is a fundamental reason why the proposed scheme comprises the redevelopment of the land to rear of this building, and seeks to retain and preserve the appearance of the main frontage building to 15 – 17 Tavistock Place.
- 5.8 This decision to retain the main building is therefore in accordance with **Policy DP25** of the 2010 Development Policies document, which seeks to prevent the total or substantial demolition of these types of buildings.

- 5.9 The effect of the development on the buildings currently located on the site fall to be considered under **paragraph 138** of the NPPF. A material consideration in the assessment of these proposals will therefore be the wide-ranging public benefits that accrue through the provision of a world-class research facility and development that makes optimal use of previously-developed land in Central London.
- 5.10 The **Townscape, Heritage and Visual Impact Study** incorporates verified views and rendered images of how the building would appear in the context of the existing streetscape from key public vistas. It demonstrates clearly that the proposed building respects the prevailing height of buildings in this area, and that the opportunity has been taken to improve the views and outlooks from Tavistock Gardens and Burton Street. The new development is, in fact, obscured by interposing development and is not visible within four of the six verified views. The upper most parts of the flues are visible in one view.
- 5.11 A more detailed discussion of the design and materiality of the new Lab building is set out in more detail in the Design and Access Statement and the **Townscape, Heritage and Visual Impact Study**.
- 5.12 The site does fall within a strategic views corridor pursuant to the London View Management Framework (2012). The purpose of this supplementary planning guidance is to give effect to London Plan (2011) **Policies 7.7 – 7.12** which seeks to guide the development of tall buildings in London and preserve designated strategic views. In this case, however, the proposed scheme falls considerably below (over 13 meters below) the threshold plane established by the 2012 SPG.
- 5.13 In summary, the detailed design of the development, with regard to massing and height, architectural style and the use of appropriate materials and palette, accords with the requirements of heritage policies at all levels of the policy cascade.

Archaeology

- 5.14 Although there are no archaeology-related designations on the Council's adopted Policies Map, new development – particularly those involving basement excavation - can result in disturbance to archaeological remains if present. To examine the potential for remains, and to address 2010 Core Strategy **Policy CS14** (*Promoting high quality places and conserving our heritage*); 2010 Development Policies document **Policy DP25** (*Conserving Camden's heritage*) and **Policy DP27** (*Basements and lightwells*); 2011 London Plan **Policy 7.8** (*Heritage assets and archaeology*); and NPPF **paragraph 128**, an **Archaeological Report** has been undertaken. This baseline assessment indicated a "low" potential for significant remains being affected by the proposed redevelopment of this site. Existing records, for example early OS maps, indicate the possible presence of post-medieval burial remains associated with the Tavistock / Woburn Chapel.
- 5.15 MOLAS' Report concludes that, if necessary, the need for any further archaeological investigations or monitoring can be dealt with by way of standard planning condition to ensure the preservation of any buried archaeological remains, if found.

Amenity Considerations

Overlooking / Privacy / Sense of Enclosure

- 5.16 Another important consideration arising from redevelopment of this site is whether the proposed new-build structure would significantly affect the levels of daylight and sunlight to existing properties.
- 5.17 London Plan **Policy 7.6** states that buildings and structures should not “*cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate*”.
- 5.18 The provisions of **Policy CS5** (*Managing the impact of growth and development*) of LB Camden’s Core Strategy also establish the requirement that development proposals consider fully the impact of developments on their occupiers and neighbours.
- 5.19 **Policy DP26** (*Managing the impact of development on occupiers and neighbours*) provides additional detail on the criteria which the Council will assess proposals on in respect of preserving the amenity of residential dwellings neighbouring new development. In terms of built form, it states that the Council will consider issues of (a) visual privacy and overlooking; (b) overshadowing and outlook; and (c) sunlight, daylight and artificial light levels.
- 5.20 Taking each of these considerations in turn, the issue of overlooking and privacy has been addressed through the incorporation of a comprehensive system of window louvres, which ensure that there are no direct views onto the habitable windows of residential units surrounding the proposed Bloomsbury Research Institute building.
- 5.21 In terms of daylight and sunlight impacts, this application is supported by a **Daylight and Sunlight Report** by GVA Schatunowski Brooks, which provides an objective assessment of the proposed scheme with regard to Development Plan policy requirements and also the latest BRE Guidelines.
- 5.22 The Report concludes that:
- “the proposed development performs extremely well, both in terms of impact on daylight and sunlight and as there will be full compliance with the BRE Guidelines, there will be no material impact on the quality of existing neighbouring amenity”*
- 5.23 It is important to note that the authors of this Report were retained by the applicants from the Feasibility Stage of this project.
- 5.24 The iterative block massing has therefore been contoured from the outset to ensure that the design minimised potential shadowing effects on neighbouring properties and was entirely compliant with natural daylight and sunlight standards.
- 5.25 It was made clear throughout the pre-application process that the Bloomsbury Research Institute project would require a facility capable of 24 hour operation. Although the likelihood of extensive night-time activity and artificial lighting is, in reality,

relatively low, the design team has nevertheless sought to mitigate the possible adverse implications of artificial light-spill during the hours of darkness. This would be achieved via the incorporation of the louvres, automated motion-activated lighting and the use of blackout blinds.

Basement Development and Construction

- 5.26 As set out earlier in the Section, the proposed development will incorporate basement levels to ensure that the building provides sufficient floorspace without being unacceptably tall or visibly bulky above ground.

Basement Impact Assessment Technical Report

- 5.27 In order to assess whether there would be a need to deal with any geotechnical issues before commencing development, a **Basement Impact Assessment Report** was prepared by engineering consultants Wilde Carter Clack to inform the early design work of the new structure. This Report provides a detailed construction methods statement which addresses, insofar as is necessary at this stage, 2010 Development Policies **Policy DP27** (*Basements and lightwells*); 2011 London Plan **Policy 5.21** (*contaminated land*); NPPF **paragraph 120**; and **CPG 4** (*Basements and lightwells*).
- 5.28 The Report makes it clear that there is nothing unusual or exceptional in the proposed development or the findings of the investigation that give rise to any concerns with regard to matters of stability or flood risk. As such, any further investigatory work in this regard can be secured by way of planning condition.
- 5.29 When assessed against the requirements of **Policy DP27**, the proposed development satisfies all the criteria, including with regard to structural stability and the amenity of neighbours. Appropriate measure would be put in place to ensure that the structural stability of neighbouring properties is maintained throughout construction phase.

Construction and Traffic Management

- 5.30 A detailed **Construction Management Plan** has also been prepared by Wilde Carter Clack to ensure that there are robust controls throughout the construction phase of the Bloomsbury Research Institute facility. This includes all necessary enabling works, demolition and the basement excavation. The document was prepared having regard to the **Policy 6.3** and **Policy 6.14** of the 2015 London Plan, the Mayor's 2013 *Construction Logistics Plan Guidance for Developers*, **Policy DP22** (*Promoting Sustainable Design and Construction*) of LB Camden's 2010 Development Policies document and **Section 8** of the Council's corresponding **CPG6** (*Amenity*) guidance. The Report thus incorporates provisions in relation to:

- construction traffic;
- site access / egress;
- highways safety (particularly cyclist safety);
- construction waste management;
- vibration dampening and the stability of adjoining properties;
- noise attenuation;
- dust reduction; and
- mitigation of pollutants.

- 5.31 This Report is of particular importance in the context of developing the land to the rear of 15 – 17 Tavistock Place, given that there is relatively constrained access / egress and because Tavistock Place has high levels of cyclist movement. The scope and content of the document was informed by extensive feedback received by Officers throughout the pre-application period and the document in draft form was also openly shared with local residents to ensure that it captures and reflects the most significant concerns about building works associated with large-scale developments.
- 5.32 If permission is granted for this application, a detailed Construction Management Plan would be prepared by the principal contractor setting out the detail of the logistics activity expected during the construction stage. It will establish associated control and mitigation measures and we anticipate that these will be secured by way of planning condition(s) or possible via a section 106 obligation.

Highways Considerations in Operation

- 5.33 Aside from the highways impacts of traffic associated with construction traffic movement, issues of long-term transport and accessibility were key considerations in the development of the proposals.

Access and Parking

- 5.34 A **Transport Statement** was been prepared to accompany the application in order to assess the impact upon highways, the opportunities for sustainable transport modes and issues of access, in line with **Policy 6.1** of the 2015 London Plan, 2010 Development Policies document **Policy DP16** (*Transport implications of development*), **Policy DP17** (*Walking, cycling and public transport*) and **paragraph 32** of the NPPF.
- 5.35 The findings and conclusions of the **Statement** underpinned the design in terms of vehicle and cycle parking space provision.
- 5.36 The NPPF requires local planning authorities to consider parking provision within new developments based upon the accessibility of the development and the opportunities for public transport, whilst recognising that there is a need to reduce the use of high emissions vehicles. In the case of this site and the nature of the established use, it is proposed that no car parking spaces are provided, apart from two spaces that will be reserved for use only by disabled persons.
- 5.37 The **Transport Statement** survey data makes it clear that this is an appropriate response given the nature of the proposed development and the day-to-day travel modes of persons likely to use this facility. To this end, the proposed vehicular parking provision is aligned fully with **Policy 6.13** (*Parking*) of the London Plan, which aims to achieve an appropriate balance between promoting new development and preventing excessive car parking provision.

Cycle Safety

- 5.38 The NPPF, the 2015 London Plan and **Policy DP17** (*Walking, cycling and public transport*) of LB Camden's 2010 Development Policies document promote cycling in locations which can be made sustainable.

5.39 London Plan **Policy 6.9** actively encourages new development to contribute to the increase of cycling through the provision of cycling parking facilities. In line with these requirements, a total of 40 cycle parking spaces are provided in the new-build facility and 24 bicycle spaces are provided in the existing School building. This is in accordance with the 2015 London Plan.

5.40 The Mayor's expectations in terms of cycle parking design is set out in the latest 2014 edition of the London Cycle Design Standards guidance. The proposed location and specification of anchor points have been chosen with regard to this guidance.

Flood Risk & Drainage

5.41 Consideration has been given to whether the amount of development proposed will be affected by flood risk considerations, having regard to 2010 Core Strategy CS13 (*Tackling climate change through promoting higher environmental standards*); 2010 Development Policies **Policy DP23** (*Water*), **Policy DP22** (*Promoting sustainable design and construction*) and **Policy DP27** (*Basements and lightwells*); 2011 London Plan **Policy 5.12** (*flood risk management*); and the relevant parts of **section 10** of the NPPF.

5.42 In the light of those policies, the **Basement Impact Assessment Report** incorporates an assessment of flood risk. The Report does not indicate any flood-related issues that should prevent redevelopment of this site.

5.43 As described elsewhere in the planning application documentation (eg in the **Design and Access Statement**), good practice measures are adopted in the design to mitigate unnecessary surface run-off and pressure on the local sewer network, for example the incorporation of green roofs and attenuation tanks.

Noise

5.44 London Plan **Policy 7.15** (*Reducing noise and enhancing soundscapes*) considers the implications of noise as part of development proposals, stating that development proposals should seek to minimise the potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals.

5.45 An **Acoustic Report** has been prepared by BDP to address 2010 Development Policies document **Policy DP28** (*Noise and vibration*) and **Policy DP26** (*Managing the impact of development on occupiers and neighbours*); London Plan **Policy 7.15**; and NPPF **paragraph 123**. This has analysed whether development on the site would give rise to harm to neighbouring residents and business premises.

5.46 The Report demonstrates that redevelopment will be acceptable in noise terms. It recommends that noise levels from the building's plant are controlled by way of planning conditions attached to any planning consent.

5.47 The Report notes that the standard measures of control by way of planning conditions restricting noise levels will be sufficient to protect the amenity of existing residents and neighbouring uses. As stated earlier, the noise impacts arising from construction activities will also be heavily controlled through restricted operating hours and the enforcement of a detailed Construction Management Plan.

Air Quality

- 5.48 The Borough forms part of the London Air Quality Management Area, so it is necessary to ensure that the proposed development will not have unacceptable air quality ramifications.
- 5.49 In terms of the gases being discharged from the building, the flues will provide the highest quality and most technologically-advanced systems of air filtration in the world. Fumes associated with flume cupboard discharge would, for example, be heavily diluted with fresh air to well within safe concentrations and then expelled at high velocity for dispersal in the atmosphere. There will be no venting of microbial organisms.
- 5.50 The poor air quality of this part of the Borough is attributable almost entirely of traffic pollution, to which this development would have negligible net impact by virtue of it being a car-free scheme.
- 5.51 It is clear, therefore, that the scheme would comply fully with the requirements of London Plan **Policy 7.14** (*Improving air quality*) and LB Camden's Development Policies document **Policy DP32** (*Air quality and Camden's Clear Zone*), both of which place considerable emphasis on minimising air pollution associated with vehicular traffic arising from development.

Sustainability and Energy

- 5.52 The NPPF seeks to ensure the delivery of renewable or low carbon energy developments in order to address Climate Change and achieve environmental sustainability through improving biodiversity and minimising waste. This was a particularly important consideration in regard to the BLO Bloomsbury Research Institute facility, given that the building will have intensive energy and servicing requirements.
- 5.53 **Section 10** of the NPPF contains the Government's policy on climate change. Paragraph 96 states that:
- "in determining planning applications, local planning authorities should expect new development to:*
- *Comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the application, having regard to the type of development involved and its design, that this is not feasible or viable; and*
 - *Take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption".*
- 5.54 London Plan **Policy 5.2** (*Minimising Carbon Dioxide Emissions*) states that development proposals should make the fullest contribution to minimising carbon dioxide emission in accordance with the 'be lean, be clean, be green' energy hierarchy. It seeks a 40 per cent improvement in carbon reductions over 2010 Building Regulations for new residential buildings between 2013 and 2016.
- 5.55 However, in April 2014, the Mayor produced its Sustainable Design and Construction SPG which outlined that a 35 per cent carbon reduction target beyond Part L 2013

Building Regulations will be applied. These targets primarily apply for major developments.

5.56 **Policy 5.3** (*Sustainable Design and Construction*) of the London Plan states that development proposals should demonstrate that sustainable design standards are integral to the proposal. This should include:

- *Minimising carbon dioxide emissions across the Site, including the building and services (such as heating and cooling).*
- *Avoid internal overheating and contributing to the urban heat and island effect.*
- *Promoting and protecting biodiversity and green infrastructure.*
- *Design features such as green roofs can enhance biodiversity, absorb rainfall, improve the performance of the building, reduce the urban heat island effect and improve the appearance of a development.*

5.57 At a local level, LB Camden's Development Policies document **Policy DP22** (*Promoting sustainable design and construction*) identifies similar requirements, including the promotion of green roofs and the requirement that non-domestic developments of greater than 500 sq m achieve "very good" in BREEAM assessments and "excellent" from 2016. This Policy is supplemented by **CPG3** (*Sustainability*).

5.58 The **Sustainability and Energy Statement** submitted in support of the application demonstrates how proposed Bloomsbury Research Institute building will be designed to achieve optimum energy performance and will incorporate the following design features:

- significantly exceed the minimum requirements of Part L2A (2013) of the Building Regulations;
- extensive solar shading;
- 100 per cent low energy lighting across all spaces;
- highly efficient heating and cooling plant;
- mixed mode ventilation to perimeter areas;
- low fan power ventilation;
- ground Source Heat Pumps;
- capped connection points to allow for future connection to a District Energy Network for heating (potentially fed from Camden Town Hall); and
- a significant PV array.

5.59 The Statement also contains a BREEAM pre-assessment which sets out how the building can achieve BREEAM "Excellent". This was a fundamental requirement of the project's principal funders, including the Bill and Melinda Gates Foundation.

Waste Management

- 5.60 The proposed management of waste streams at this site has regard to 2010 Core Strategy **Policy CS18** (*Dealing with our waste and encouraging recycling*); 2015 London Plan **Policy 5.16** (*waste self-sufficiency*); the Government's **Waste Management Plan for England** (2014); and the emerging policies of the draft **North London Waste Plan**.
- 5.61 The Construction Management Plan that accompanies the application explains how the principal contractor will be required to maximise opportunities to recycle the waste produced by demolition and construction activities, via the use of a "Site Waste Management Plan". It is particularly important in the context of a constrained site like 15 – 17 Tavistock Place that traffic associated with the movement of these waste materials is minimised. As such, the Principal Contractor will be required to recycle waste and utilise vehicle backhauling whenever possible.
- 5.62 As set out in the **Waste Management Statement**, users of the Bloomsbury Research Institute will dispose of all waste in line with the "Waste Hierarchy" contained in the 2014 National Planning Policy for Waste. More detail regarding the day-to-day management of waste is contained in The School's 2013 "Waste Management Policy and Guidance Document" which is appended to the Waste Management Statement.
- 5.63 The Bloomsbury Research Institute intends to operate with a euro bin waste compactor internally within the waste stores and this will help further increase the volume of recycling that takes place on site. All non-recyclable / laboratory waste will be stored in appropriate receptacles on site before being treated and disposed of off-site by a specialist waste contractor.
- 5.64 Traffic associated with treatment and disposal of all facility waste is anticipated by the Bloomsbury Research Institute project team to be minimal. All non-biomedical waste is anticipated to be removed weekly, with increased holding space allowing for a reduced need for collections.

6.0 Planning Obligations and Community Infrastructure Levy

6.1 The final Heads of Terms will be dependent on (i) comments arising from the formal application consultation process, and (ii) further negotiation with LB Camden, but they are likely to include:

- a delivery and servicing plan for the facility;
- travel plans to encourage sustainable travel; and
- employment and training initiatives for the construction phase;

6.2 The Bloomsbury Research Institute will continue to liaise with Officers of the Council with a view to agreeing a set of mutually-agreeable heads of terms.

Community Infrastructure Levy

6.3 Both the Mayor's CIL Charging Schedule (2012) and LB Camden's CIL Charging Schedule (2015) establish a levy rate of £Nil per sq m net additional floorspace of D1 use development, pursuant to the Community Infrastructure Levy Regulations 2010 (as amended).

7.0 Conclusions

- 7.1 This Planning Statement has been prepared to accompany an application for planning permission for the redevelopment of ancillary buildings to the rear of 15 – 17 Tavistock Place in the London Borough of Camden. It provides an assessment of the proposed scheme against the statutory Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 7.2 There is strong policy support at the international, national, London-wide, and local level for the type of biomedical research that would be enabled by this development.
- 7.3 The Bloomsbury Research Institute project is a collaboration between two of the world's leading research bodies with the aim of establishing a centre of research excellence in the heart of Camden.
- 7.4 The scheme would make a major contribution to addressing a fundamental planning policy objective, through the provision of a new laboratory facility in the core of the Mayor's MedCity Enterprise Zone.
- 7.5 It would allow for the creation of a contemporary and purpose-built facility that significantly increases London's capacity to contribute to the global understanding of – and response to – human diseases. The Institute would house world-leading scientists and have the potential to achieve significant breakthroughs in biomedical research and development.
- 7.6 The significance of the Project is evidenced by the range of international and national funders that are supporting the Institute. These include the World Health Organisation, the Bill & Melinda Gates Foundation, the Wellcome Trust and The Higher Education Funding Council.
- 7.7 15 – 17 Tavistock Place was identified as the most appropriate location in which to develop a state-of-the-art laboratory capable of accommodating and servicing a critical mass of scientists. A detailed assessment of sites took account of a wide range of factors, but in every quantifiable way, Tavistock Place was the preferred location of choice.
- 7.8 The proposed scheme has been formulated in accordance with the 2015 London Plan, the London Borough of Camden's 2010 Core Strategy and Development Policies document, and other relevant material considerations. The scheme has been evolved as a result of careful consideration of all of these factors and as a consequence of feedback received during thorough pre-application consultation with local residents, Officers at the London Borough of Camden, and locally-elected Members.
- 7.9 The Bloomsbury Research Institute, The School, and UCL ran a wide series of events with all key stakeholders and over 7,500 people were consulted as a part of this process. This engagement will continue.
- 7.10 The application proposes modern laboratory floorspace to replace existing, underutilised and low quality shed structures on the site. The proposal thus makes best use of previously-developed land which is a fundamental requirement of the London Plan.

- 7.11 The architects developed a functional building that sits comfortably with its neighbours and preserves the setting of listed buildings and the wider Conservation Area. The Project will also bring benefits to the Bloomsbury Conservation Area through the continuation of appropriate land uses and the provision of a high quality building that replaces a low quality former depot structure.
- 7.12 The proposed materials offers an extremely high quality and durable solution, which would be of an appropriate style within this land-locked location.
- 7.13 The proposed redevelopment of this site represents a continuation of the existing lawful use and is entirely compliant with development control policies for this area. It constitutes “sustainable development” as set out in the NPPF, making a positive contribution in economic, social and environmental terms.
- 7.14 Overall, the proposals comply with policy at all levels and there is an overwhelming case for the application to be allowed in the light of the significant public benefits which the development would facilitate.

Appendix 1
Site Selection Assessment

Selection of a suitable site for the Bloomsbury Research Institute

February 2013

Introduction

This report explains the background and selection criteria for the **London School of Hygiene and Tropical Medicine** (the School) and **University College London** (UCL) proposal to build the Bloomsbury Research Institute.

The report firstly identifies the purpose and function of the new Institute. It then examines the key criteria and desirable characteristics which any suitable site would need to possess. It explains the site identification exercise, and the various potential sites which have been considered. It goes on to explain a little more about the background of each site and some of the opportunities and constraints which were found to exist before setting out a summary of the analysis and “weighting” given to each of the attributes when applied to the various sites.

The overall purpose of the report is therefore to:

- Explain the purpose and function of the Bloomsbury Research Institute.
- Explain clearly the attributes necessary for a suitable site.
- Explain the site search procedure.
- Explain the assessment procedure.

And thus to:

- Explain the final selection of the most suitable and appropriate site.

Purpose and Function of the Institute

Infectious diseases continue to emerge, re-emerge and evolve. Pandemic influenza, HIV/AIDS, TB and malaria are global health threats and account for more than 4 million deaths annually. Diarrhoeal and neglected infectious diseases exact an enormous public health burden in the world and restrain economic growth.

In the UK, virulent microbial pathogens such as *Clostridium difficile*, *methicillin-resistant Staphylococcus aureus (MRSA)* and *norovirus* are a major drain on the NHS. The challenges, for these and other infections, are to find new treatments, methods of prevention and integrated approaches to control. This requires:

- increased knowledge of pathogen genetic variation and the host immune response;
- greater understanding of the effect of human diversity on interaction with pathogens;
- establishment of collaborative and interdisciplinary approaches that accelerate the development of improved diagnostics, drugs and vaccines; and
- biomarkers and models to better define factors that affect disease transmission.

Together, the School and UCL contain one of Europe's largest groupings of biomedical researchers, with 77 Principal Investigators and over 250 scientists. Combined research income over the past four years is in excess of £100 million. The core grouping within the proposed new laboratory facility would be formed by:

- members of the School Faculty of Infectious and Tropical Diseases;
- the UCL Division of Infection and Immunity; and
- the Medical Research Council Centre for Molecular Virology at UCL.

Both the School and UCL are among the most cited institutions globally in the areas of infectious diseases, virology, bacteriology and parasitology. The significance of this project is underscored by the fact that the principal funders are the Higher Education Funding Council, the Wellcome Trust and the Bill & Melinda Gates Foundation.

The new facility would create a critical mass of excellence in fundamental and clinical research to complement and enhance current expertise. This would allow the additional recruitment of leading international researchers and co-appointments with the Crick Institute and UCL Hospital. It would also encourage closer working with structural biologists (Birkbeck College), genome researchers (Wellcome Trust Sanger Institute), and with population and computational biologists from the parent institutions.

In short, the proposal is to provide a new and unique research facility that significantly enhances the UK's ability to understand and combat infectious diseases, and to build on the world-renowned research expertise of UCL and the School.

Selection Criteria

A number of selection criteria have been identified and weighted to provide an objective method of assessing the suitability of a range of possible development sites. These criteria include:

A. **Site capable of accommodating the facility**

The configuration of the laboratory / write-up / support spaces necessary for this type of facility is important. A site that is not capable of delivering an appropriate quantum or configuration of floorspace would not be considered viable for the Bloomsbury Research Institute facility.

Weighting: Capable of accommodating the necessary facility: 10
Not capable: 0

B. **Freehold owned by the School or UCL (or another public body willing to release the land)**

Money spent on purchasing land would divert funding away from critical research programmes. It is therefore desirable that the land is readily available to the Institute in order to allow this facility to be delivered within reasonable time and cost parameters.

Weighting: Site capable of release within timescale:10
Not available: 0

C. **Close proximity to partner bodies**

The synergies with these centres are considered essential to the project's long-term efficacy and success.

Weighting By comparable distance to cognate institutes. Adjacent: 10
Beyond 2 hour travel time: 0

D. **Not already programmed by the School, UCL or other public body for teaching, research, administrative or residential use**

Those sites that have already been identified or otherwise committed to alternative uses are not considered available.

Weighting: Available: 10
Not available: 0

E. Eligibility for grant funding

Grant funding, whether from public or private sources, is very location sensitive. Increasingly funders, especially central government, expect maximum value to be gained from public expenditure and proximity and sharing of equipment and facilities are now a prerequisite. Funding for this project is predicated on a central London location at the heart of the Mayor's MedCity Enterprise Zone. The principal funders – including the Higher Education Funding Council, made commitments on the basis of a new facility being delivered in close proximity to the partner institutes and other partners organisations such as the Crick Institute and major teaching hospitals.

Consideration is also given to the longer-term ability of Bloomsbury Research Institute projects to attract grant funding either in isolation, or where the Institute works in partnership with collaborating research institutes.

Weighting: Eligible: 10
 Not Eligible: 0

F. Site constraints

It is important that the site is not prohibitively expensive or impractical to clear for development. A highly constrained site will divert funding from other uses and require additional time to enable preliminary works or site remediation. The laboratory facility will be highly specialised and it is unlikely that an existing building (other than perhaps a laboratory building) would be capable of sufficient adaptation. It has therefore been assumed that a new-build facility is required.

Weighting: An assessment has been made in each case, and a score between 0 and 10 given on the basis of likely cost / difficulty, with 0 being the most difficult, 10 the most straightforward.

Overview of the Sites Considered

The following site in UCL ownership was considered:

1. **Courtauld Building, 91 Riding House Street, W1W 7BS**

The following sites in School ownership were considered:

2. **Keppel Street Building, WC1E 7HT**
3. **15-17 Tavistock Place, WC1H 9SH**
4. **Land to the rear of Beaumont School, Winches Farm, St Albans, Hertfordshire**

The following sites were also considered:

5. **Arthur Stanley House, 44-50 Tottenham Street, W1T 4RN** (mainly within the ownership of UCLH NHS Trust)
6. **Middlesex Hospital Annexe, Cleveland Street** (owned by UCLH NHS Trust)

In addition to these sites, UCLH and University of London, Senate House were each approached to see if they had additional assets that could be considered. They confirmed that no other sites were available for disposal which matched the basic capacity requirements of the proposed Bloomsbury Research Institute facility.

Analysis of Weighting & Overall Scoring

	A Site capable of accommodating facility--	B Freehold owned by the School or UCL or another public body willing to release the land	C Close proximity to partner organisations	D Not already programmed for teaching, research, administrative or residential use	E Within an appropriate area for public or private funding	F Site not prohibitively expensive or impractical to clear for development	Total score
Courtauld Building	0	10	5	8	7	5	35
Keppel Street Building	5	10	5	5	7	5	37
15-17 Tavistock Place	8	10	10	10	10	8	56
Land to rear of Beaumont School	8	10	0	10	0	2	30
Arthur Stanley House	5	2	6	0	7	6	26
Middlesex Hospital Annexe	5	0	7	0	5	2	19

Discussion

A number of sites were considered, and these fell into two major types: existing buildings and potential development sites.

Courtauld Building

A building owned by UCL that was empty but had been used previously as a laboratory building. The conversion of this building was ruled out as it would provide insufficient capacity / floorspace to accommodate a critical mass of scientists to make the facility effective. The site also suffers from poor road access for deliveries.

Keppel Street Building

This building is already fully occupied by the School but was evaluated in any case for completeness. The space available is insufficient and any refurbishments would be hindered by internal conservation heritage constraints and current building layout. It was also considered that the uniqueness of the partnership relationship would be diluted by embedding the proposed institute within an existing and fully operational School building.

Tavistock Place

A site owned by the School and already being considered for development. This site comprises a unused out building and a poorly maintained garage area toward the site rear. The feasibility study confirmed that a building of sufficient space could be designed to meet the business needs of the Bloomsbury Research Institute and fit the brief. The central location of this site and its proximity to the local research hub is considered a significant benefit, with the added advantage of being equidistant from the two partner institutes.

Land to rear of Beaumont School

This site is owned by the School but was discounted on the basis of its remote location and the development constraints associated with its designation as greenfield space. The site is not within an identified biomedical research hub, which undermines the project's potential to attract and retain world-class scientists and form partnership arrangements with relevant clinical research / teaching facilities.

Arthur Stanley House

The site is currently the subject of a live application by the University College London Hospitals Charity (Ref: 2015/0391/P) to refurbish the existing eight storey building and redevelop the rear of the site to deliver new office and residential floorspace. The site is therefore considered unavailable.

Middlesex Hospital Annexe

This site is still being promoted by the owners (UCLH NHS Foundation Trust) for residential development. The site is now constrained by virtue of the recently-listed Georgian workhouse building, which would have implications in terms of designing a feasible laboratory facility.

Conclusion

Careful analysis of the potential locations for this facility has identified the land to the rear of **15-17 Tavistock Place** as the most suitable site for delivering the new Bloomsbury Research Institute facility.

The site is extremely well sited in close proximity to other essential cognate institutes. It offers the only feasible location that is capable of accommodating the required quantum and configuration of new-build laboratory floorspace.

It is on this basis that a proposed development at 15-17 Tavistock Place will be taken forward to design stage.

Appendix 2
Planning Performance Agreement

**Bloomsbury Research Institute: London School of Hygiene and Tropical
 Medicine**
15 – 17 Tavistock Place, London, WC1H 9SH
PLANNING PERFORMANCE AGREEMENT

1. Introduction

- 1.1 This Planning Performance Agreement (PPA) covers the pre-application process through to the determination of the planning application for the proposed re-development of the site at 15 – 17 Tavistock Place, London, WC1H 9SH. The PPA will provide a project management framework and timetable within which to carry out the various stages of progressing the scheme to the submission of a valid application and the potential completion of a Section 106 Agreement and issuing of planning permission.
- 1.2 The aim of the PPA is to improve the quality of the decision making process, as opposed to the speed of the decision. A PPA is considered appropriate in this instance due to the constraints of the development, including its location and the nature of the development proposed, including whether the larger site is incorporated.
- 1.3 The subject scheme involves the demolition of the warehouse to the rear of the building at 15 – 17 Tavistock Place and its replacement with a new purpose built laboratory and research building.
- 1.4 All parties share the desire for a clear path towards an effective decision making process and one which identifies any key issues of conflict and the resources required to resolve them at an early stage along the way. This document sets out the way forward in achieving this.
- 1.5 This agreement will apply from the date the PPA is signed and shall remain in force until the decision date (being the date a planning decision is issued by the Council on the Planning Application) (or such extension of this Term as agreed), and upon the expiry of such period this PPA shall cease.

2.0 The Parties

- 2.1 The parties signing up to the PPA comprise London School of Hygiene and Tropical Medicine, University College London, together as the “Developer” and Camden planning officers as the Local Planning Authority (LPA). The application will be submitted by Montagu Evans on behalf of the Developer.

Developer Planning Project Team:

Role	Name	Contact details
Developer	London School of Hygiene & Tropical Medicine	Nick Jones 020 79272044 nick.jones@lshtm.ac.uk
Architect	BMJ Architects	Duncan Leach 020 7833 9974 d.leach@bmjarchitects.co.uk

Planning Agent	Montagu Evans LLP	Nick Sharpe 020 73127409 nick.sharpe@montagu-evans.co.uk
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Local Planning Authority Team (LPA)

Role	Name	Contact details
Assistant Director Planning and Public Protection	Frances Wheat	0207 974 5630
Development Management Service Manager	Stuart Minty	0207 974 2660
Development Management Team Manager	Gavin Sexton	020 7974 3231
Case Officer	Michael Cassidy	020 7974 5666
Heritage and Conservation Officer	Charles Rose	020 7974 1971
Transport Officer	James Hammond	020 7974 2947
Noise Officer	Edward Davis	020 7974 4501

3. Procedural Arrangements

- 3.1 The Developer will meet with the Local Planning Authority throughout the application phase in order to address issues that might arise as may be agreed appropriate between the parties.
- 3.2 Any meetings will be structured as formal pre-application meetings and will be programmed according to the PPA Diary. The Council will provide appropriate officers to attend these meetings.
- 3.3 The parties will seek to have agreed Heads of Terms and full draft detailed wording of a S106 in advance of the DC Committee to enable final signing and sealing of the S106 in a timely fashion.
- 3.4 The procedural arrangements and timetable for dealing with the application depend upon the date for formal submission of the application. The date the applicant intends to submit the application is June 2015. This date may be changed only with the agreement of the parties (acting reasonably) and may necessitate a review of the timetable and timescales within it.
- 3.5 The Developer will submit the planning application on two CDs, and if feasible, via the planning portal. No paper copies are required (although paper copies of individual documents may be requested).
- 3.6 The LPA will use reasonable endeavours to complete its validation check within 5 working days of submission and the Developer will use reasonable endeavours to submit any additional information required by the LPA to validate the application within 5 working days of any request by the LPA for this

information. The standard 21 day consultation period for nearby occupiers and external consultations will have commenced by beginning of week 3.

- 3.10 The Developer will make all reasonable endeavours to work jointly with the LPA and in the event the LPA suggest amendments the Developer will be allowed to amend the scheme to suit the comments made by the LPA.
- 3.8 The Developer will make all reasonable endeavours to work jointly with the LPA and to respond to requests for further information, points of clarification, or presentational material to assist with the understanding of the proposals and their communication to Members and/or the public at meetings or briefing sessions as might be appropriate.
- 3.11 Unforeseen circumstances arising which result in revisions or further information being submitted, will only result in a review of the timetable if re-consultation is necessary. In such event the timetable will be varied by agreement with both parties.
- 3.12 Periodic review meetings will be held to deal with any matters arising, commencing from post-consultation onwards, as required, if and when issues arise through to committee.
- 3.13 In the event that officers support the application and are minded to make a recommendation to approve the application, the council will take the application to committee within 11 weeks of submission unless otherwise agreed with the applicant and, use reasonable endeavours to complete the signing of the s106 agreement 2 weeks thereafter. In the event that officers are unable to support the application and are minded to refuse the application, the Council will refuse the application within 13 weeks of submission unless otherwise agreed with the applicant.
- 3.12 In the event that officers support the application and are minded to make a recommendation to approve the application, the LPA will have provided the Developer with an advance copy of draft conditions, with sufficient time to review and comment upon them, prior to finalising the report to committee.
- 3.13 In the event that officers support the application and are minded to make a recommendation to approve the application, the LPA will clear its report to committee and other steps in the process as appropriate with the Council's Legal Team and potentially external Counsel.
- 3.14 All reasonable endeavours will be undertaken on the part of both parties as appropriate to meet an agreed target date for final decision following the resolution of LBC DC Committee.

4. PPA Timetable

- 4.1 A timetable for the procedural milestones referred to above is attached as part of the PPA (the 'PPA Timetable') which it is the responsibility of both parties to make reasonable endeavours to meet. The PPA Timetable will be reviewed if necessary between the parties in accordance with the agreed Procedural Arrangements of the PPA and if any relevant unforeseen matters arise.

PRE SUBMISSION

Date (w/c)	ACTION	COMMENTS
November 2014 - January 2015	Community Engagement Coordinator worked with local ward councillors, council contacts and known community representatives to identify a list of key local community groups and stakeholders	Stakeholder Analysis
January - April 2015	53 community groups and resident / business representatives contacted and made aware of the proposals for development. This was an opportunity also for local people to have a say in how they would be consulted, which led to three key consultation events	Community Engagement
12 January 2015	Site meeting & follow-on review: <ul style="list-style-type: none"> • Land Use Principles • Design & Conservation Principles • Design • Access • Amenity & Neighbours • Construction logistics & Basement Issues 	Note: information pack to be issued 05 Jan 14 Case officer & Cons Officer
03 February 2015	2 nd Pre-application meeting <ul style="list-style-type: none"> • Land Use – update from previous meetings • Design - update from previous meetings • Energy & sustainability • Basement Impact • Traffic Transport & Servicing • Initial s106 obligations review/HOTs • Feedback on applicant's consultation programme 	Case officer Cons Officer Highways Officer Energy Officer
23 February 2015	3 rd Pre-application meeting <ul style="list-style-type: none"> • Design - update from previous meetings • Energy & sustainability • Basement Impact • Traffic Transport & Servicing • Initial s106 obligations review/HOTs • Feedback on applicant's consultation programme 	Case officer Cons Officer EH Officer
30 March 2015	4 th Pre-application meeting <ul style="list-style-type: none"> • Design - update from previous meetings 	Case officer Cons Officer

	<ul style="list-style-type: none"> • Traffic Transport & Servicing • Update Michael Cassidy (new case officer) • Consultation programme 	
W/C 13 April 2015	Formally seek EIA Screening opinion	Not subject to formal consultation period. Likely 3 week turnaround.
23 April 2015	5 th Pre-application meeting <ul style="list-style-type: none"> • Feedback from applicant's consultation • Design response to officer comment, CAAC, neighbours and amenity groups • Agree submission scheme 	Case officer Cons Officer Highways Officer
23 April 2015	150 resident and business neighbours (by letter and in person respectively) invited to meet the development team and view proposals. 4 attended and conversations are continuing. In addition 3 people asked to be kept informed	Consultation 1 - Immediate Neighbours
25 April 2015	Stall held at the St. George's Gardens Community Party to inform local residents of proposals and encourage them to sign up to regular newsletter and/or attend the wider consultation event on 28th April. Around 30-40 people spoken to 1-2-1 and given information on the proposals	Consultation 2 - Community Event
28 April 2015	7500 local residents invited by mail-drop to attend open consultation forum (email invite also sent to community groups already engaged). 15 residents and community representatives attended; additional 8 could not attend but wished to be kept informed.	Consultation 3 - Open Meeting
12 May 2015	Feedback on issues raised at previous events and round table discussions; for anyone who attended previously or has asked to be kept informed. Also advertised through community group databases	Consultation 4 - Feedback
End of May	<ul style="list-style-type: none"> • Separate 1-2-1 consultation meetings arranged for people who could not attend the above events: 3 residents and 1 community group (to be completed by 15th May) • Meeting with Bloomsbury Conservation Area Advisory Committee • Meeting with Bloomsbury and King's Cross ward councillors - deferred until after the General Election due to lack of availability, councillors have been kept regularly informed by email of engagement and 	Ad Hoc Meetings

	consultation activities (to be held by end May)	
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Formal Application Process

W/C 22 June 2015	Submission of Application	
W/C 29 June 2015	Validation of application by LB Camden and issue of letters of consultation.	
W/C29 June-20 July	Consultation period	Needs to allow sufficient time to place Press Advert
W/C 20 July	Review application and amendments to application where necessary	
W/C 3 August 2015	Receipt of amendments Commence report write up Commence S106 drafting	
W/C 10 August 2015	Pre-committee meeting if required <ul style="list-style-type: none"> • S106 • Affordable Housing • Community benefits 	
W/C 17 August	Draft conditions circulated for comment	
TBC September 2015	Completion of report	
TBC first week of September 2015	Target date for finalisation of S.106 agreement or to coincide with week of Committee if later.	
24 September 2015	1 st preference Development Control Committee	
15 October 2015	2 nd preference Development Control Committee	Optimum date. Deadline for complete report is TBC
5 November 2015	3 rd preference Development Control Committee	
3 weeks from Committee date	S106 signed and decision notice(s) issued	

5. Financial Contribution

- 5.1 The developer will contribute to the Council's costs in respect of this service by payment of a single fee (£12,000) to cover the period of the PPA. In addition, the fees charged for the scheduled pre-application meetings, totalling £19,200, are to be paid prior to any planning application being submitted.
- 5.2 The above financial contributions will be in addition to the normal planning application fee and will be exclusive of the Council's legal costs involved in association with drafting and advising upon the S106 Agreement.

6. Performance Standards

6.1 **The Developer agrees** to use its reasonable endeavours to achieve the following performance standards at all times:

- a. To provide to LBC at least 5 working days prior to any meeting all substantive and relevant documents which are relevant to that meeting and which relate to any relevant action points or agenda item identified.
- b. To provide LBC with such additional information as may be requested within 10 working days of such written request from LBC (or such other time period as may be agreed).
- c. To carry out such further public consultation as may be reasonably requested by LBC as soon as reasonably practicable.
- d. To make all reasonable endeavours to work jointly with the LPA and to respond to requests for further information, points of clarification, or presentational material to assist with the understanding of the proposals and their communication to Members and/or the public at meetings or briefing sessions as might be appropriate.
- e. To work with the LPA to ensure adherence to the PPA Diary and Procedural Arrangements.

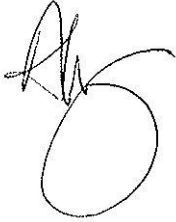
6.2 **The Local Planning Authority agrees** to use its reasonable endeavours to achieve the following performance standards at all times:

- a. Respond substantively to all emails, letters and telephone calls within 5 working days of receipt. Where circumstances beyond the reasonable control of the Council prevent compliance, the Developer shall be notified of such circumstances.
- b. To provide the Developer within 5 working days of any other meeting, the action points arising from that meeting.
- c. To issue the planning decision no later than 2 weeks following any resolution made by the Development Control Committee (on the proviso that the application is considered by the Development Control Committee).
- d. To provide the Developer with an advance copy of draft conditions to review and comment upon prior to finalising the report to committee (on the proviso that the application is considered by the Development Control Committee).
- e. To work with the Developer to ensure adherence to the PPA Diary and Procedural Arrangements.

Agreed on behalf of the London Borough of Camden

Date June 2015

Agreed on behalf of LSHTM



Date 18 June 2015

Appendix 3
EIA Screening Decision, May 2015

Montagu Evans LLP
5 Bolton Street
London
W1J 8BAApplication Ref: **2015/2359/P**
Please ask for: **Michael Cassidy**
Telephone: 020 7974 **5666**

8 May 2015

Dear Sir/Madam

DECISIONTown and Country Planning Act 1990 (as amended)
Town & Country Planning (Development Management Procedure) Order 2010
Town & Country Planning (Environmental Impact Assessment) Regulations 2011**Request for Screening Opinion EIA Not Required**Address:
15 -17 Tavistock Place
London
WC1H 9SH

Proposal: Request for screening opinion to ascertain whether an Environmental Impact Assessment is required for the construction of a medical research laboratory and higher education facility with ancillary accommodation as set out in the Montagu Evans letter dated 14/04/2015 and received 17/04/2015.

The Council has considered your application and offers the following opinion:

The proposal falls within the description at paragraph 10b of Schedule 2 and exceeds the threshold of 0.5 hectares in column 2 of the table in Schedule 2 of the 2011 Regulations. Therefore the Council considers the proposal to be 'Schedule 2 development' within the meaning of the 2011 Regulations. Accordingly, the Council has considered if the proposed development is likely to have significant effects on the environment. In determining such effects, the Council has taken into account the criteria for screening Schedule 2 development set out in Schedule 3 of the Regulations. These are the characteristics of the development, its location and the characteristics of the potential impact.



Based upon the description of the development provided and the information provided in your submissions received 17/04/2015, the development is not considered to be likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

Accordingly, in exercise of the powers conferred by regulation 5(5) of the 2011 Regulations, the Council hereby considers that the proposed development described in your request and the documents submitted with it, is not 'EIA development' within the meaning of the 2011 Regulations.

Yours faithfully



Ed Watson
Director of Culture & Environment

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It is important to us to find out what our customers think about the service we provide. To help us in this respect, we would be very grateful if you could take a few moments to complete our [online planning applicants' survey](#). We will use the information you give us to monitor and improve our services.

