

GF/NJ/PD11816

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Camden Council
5 Pancras Square
London
N1C 4AG**

19 March 2021

Dear Sir/Madam

**LONDON SCHOOL OF HYGIENE AND TROPICAL MEDICINE, KEPPEL STREET, LONDON WC1E 7HT
APPLICATION FOR PLANNING PERMISSION AND LISTED BUILDING CONSENT FOR REPLACEMENT OF
WINDOWS**

Please find enclosed on behalf of our client, the London School of Hygiene and Tropical Medicine (the 'Applicant') an application for Planning Permission and Listed Building Consent for external alterations at the London School of Hygiene and Tropical Medicine, Keppel Street, Bloomsbury, London WC1E 7HT (the 'Site'). The precise location and extent of the Site is made clear within the submission material which accompanies this letter.

The proposed description of development is as follows:

"Replacement of all (modern) windows on the Malet Street, Keppel Street and Gower Street facade and associated works."

Background

The London School of Hygiene and Tropical Medicine (LSHTM) plays a vital and global role as a leading centre for research and postgraduate education in both public and global health. In partnership with UCL, The LSHTM forms part of The Bloomsbury Research Institute which seeks to deliver a global centre of excellence for research into new modes of disease detection, treatment and control. LSHTM work includes fundamental and clinical research with a particular expertise in microbial pathogens including antibiotic-resistant strains of bacterial and new and emerging viruses.

The LSHTM has over the years assisted in expanding and developing London's research capacity alongside attracting and retaining world-class scientists and clinicians. The LSHTM has also played a vital role in the London Borough of Camden (LBC) developing their own leading position as a hub for biomedical research within the Capital. The LSHTM is therefore not only a global but a national and local asset, which should continue to be supported at all levels to ensure their work can continue to be undertaken.

Site and Location

The Site is located within the administrative area of LBC and comprises of a part four storey plus basement and a part seven storey plus basement Portland Stone building, which is Grade II Listed. The Site is occupied by LSHTM, who are located between two main sites in Camden – Keppel Street and Tavistock Place. The proposed works in this Application concern solely the Site at Keppel Street.

The Site is bound to the north by Malet Street with buildings including the Senate House Building, Grade II*, which is the administrative centre of the University of London. The Art Deco building was constructed between 1932 and 1937 and reaches 19 storeys. The Senate Library and The Institute of Modern Languages Research are also located within the Senate House Building, with Russel Square Gardens located beyond this. The Site is bound to the east by Keppel Street with Malet Street Gardens and the British Museum beyond. Further to the east, numbers 2 to 20 Gower Street are Grade II Listed and predominately comprise of three storey brick buildings hosting Birkbeck University. Gower Street bounds the Site to the south and the Site is directly bound to the west by Warwickshire House, a six storey plus basement predominately stone and brick building. Adjacent to Gower Street, three to four storey brick buildings are located. Further to the West, number 74 to 80 Gower Street, are Grade II Listed.

The existing building within the Site is Grade II Listed. Details of the Building's listing are contained within the accompanying Heritage Statement. . The Building was listed in March 1982 with the listing description identifying key features of the building including the steel frame construction, the Portland stone and the H shaped building plan lay out. The Site lies within the Bloomsbury Conservation Area. The Conservation Audit identifies that the Site was completed in 1929 to the designs of Morley Horder and Verner Rees. The Audit further identifies that the stone fronted building adheres to a stripped neo-classical style, with vertical proportions.

The heritage context of the Site is further set out within the Heritage Statement, prepared by Rivington Street Studio, which accompanies this Application.

The Site has a PTAL rating of 6b, which identifies the Site as being highly accessible.

A review of the LBC's online planning history has been undertaken. The available planning history files of relevance are set out below:

- Listed Building Consent was granted in September 2020, under application ref:2020/2373/L, for the construction of glazed/plasterboard separations 1 of the North Courtyard Building and the North Courtyard (to the same design / details as the Phase 1 enclosure at levels 2 and 3), and the installation of a new dry riser from a new inlet cabinet in railings facing Malet Street to new outlet cabinets at the lower ground, ground and first through fourth floors.
- Listed Building Consent was granted in February 2020, under application ref:2019/3918/L, for internal refurbishment including changes to partitions, floor finishes, ceilings, doors and services. The application also received consent for external alterations including reconfiguration of 2 window opens facing the north courtyard, replacement of 2 north courtyard facing and 3 south courtyard facing windows, new riser enclosures and services.
- Listed Building Consent was granted in March 2012, under application ref:2011/6276/L, for internal alterations and refurbishment of the main entrance hall, reception, security station and entrance hall lighting.
- Planning Permission and Listed Building Consent was granted in July 2006, under application ref:2006/0900/L & 2006/1865/P, for the extension and refurbishment of part of the 4th and 5th floor levels involving the replacement of the existing roof plant, together with the erection of 3x wind turbines and photo-voltaic arrays on the roof and other associated works.

Proposed Development

Planning Permission and Listed Building Consent is sought for external alterations to the Site, specifically the replacement of all the existing windows on the Building's elevations fronting Malet Street, Keppel Street and Gower Street. The proposed works have been identified by the LSHTM, following receipt of funding from the Salix Public Sector Decarbonisation Scheme. The funding has been made available to fund sustainability driven upgrades to the LSHTM Estate, including their Keppel Street Site. The funding available to the School is based on a performance criteria, which seeks to improve energy performance and the sustainability of the building. A key and critical condition of this funding is that the works are completed and fully invoiced by the end of September 2021.

The existing windows within the Building comprise of both aluminium frame non-thermally broken double glazed, which are in a poor condition, and non-original steel framed non-thermally broken single glazing, which are in a fair condition. The windows currently in situ are not original and we understand that the original windows on Malet Street were replaced between 1995 and 2005. These windows are annotated in red on the accompanying plan: Existing Elevations – Window Types. It is unknown when the remaining windows on the Building were replaced however it is clear from their quality, design and materiality that they are not original and as such they have no historic significance.

As shown on the accompanying photographs, the existing windows are of poor quality and differ in both design and quality throughout the building. This is a clear reflection of a piece by piece approach to their replacement and as such it is clear that they cause 'less than substantial harm' to this highly significant heritage asset as well as materially detracting from the character and appearance of the Bloomsbury Conservation Area.

The proposed scheme seeks to carefully replace the existing windows throughout the building with Jenson Janisol Windows, which is a high quality window system. These applications are accompanied by copies of the building's elevation from 1926, which clearly depicts the dimensions and proportion of the original windows. Dimensions have also been included on the proposed drawings to assist in LBC's review of the proposal, which seek to faithfully replicate the original window design.

The proposed steel framed window (Jansen Janisol Arte 2.0) includes 40mm glazing bars, as such both in terms of materiality and overall design, the proposal replicates the original window design installed in the Building as shown on the 1926 elevations.

To make this clear and easily understood, the accompanying Design and Access Statement provides a comparison of the proportion and design of the original, existing and proposed windows.

In addition to the heritage benefits wrought by the windows' replacement, the proposed windows will meet Building Regulations Part L2B requirements which specify a U Value of 1.8W/M2k. This in turn will significantly improve the thermal performance of the building and will ensure it achieves current energy requirements in this respect, whilst delivering a high quality replacement window scheme which draws upon the original character of the building.

The accompanying Application Plans and Design and Access Statement prepared by Rivington Street Studio, provides further details on the proposed alterations.

Planning Policy Context

The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the legislative duties of the decision maker in this case.

The relevant provisions to this application extended from Sections 16(2), 66(1) and 72 (1) of the Planning (LBCA) Act 1990. These sections of the Act state respectively:

'In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'

'In considering whether to grant planning permission for development which affects a listed building or its setting, the decision-maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historical interest which it possesses.'

'In the exercise, with respect to any buildings or other land in a conservation area ... special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'

The statutory tests flow into the policies of the statutory development plan and the policies of the National Planning Policy Framework (NPPF, 2019) discussed below.

The Statutory Development Plan for the LBC consists of the following:

- The London Plan (2021) (the “London Plan”);
- The Camden Local Plan (2017); and
- Site Allocation Plan (2013).

The Mayor of London formerly published the new London Plan (March 2021) on the 2nd of March 2021, which replaced the 2016 London Plan and now forms part of the Statutory Development Plan for the Site.

At present, LBC are not in the process of reviewing or producing a new Local Plan.

Material Considerations

Chapter 16 of the National Planning Policy Framework (2019) sets out the Government’s policies relating to the conservation and enhancement of the historic environment in determining planning applications.

Paragraph 189 of the NPPF states that applicants should describe the significance of any heritage assets affected, including any contribution made by their setting. The paragraph goes on to state that *‘the level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance’*.

Paragraph 193 states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more significant the asset is, the greater the weight that should be given to its conservation. This means that decision makers must attribute ‘great weight’ to any harm identified to heritage assets through a proposal when making planning decisions. The ramifications of paragraph 193 extend to encompass any beneficial works and this is confirmed by the High Court in *Rottingdean*¹. Taking into account the considerable planning weight that attaches to any harm to a designated heritage asset, it follows that equal weight should be accorded to beneficial works.

The site is located within the Bloomsbury Conservation Area, and is therefore subject to the Bloomsbury Conservation Area Appraisal and Management Strategy, adopted by LBC in 2011. This is discussed in greater detail below.

Site Designation

In accordance with the Council’s Policies Map (last updated January 2021), the Site is subject to the following designations:

- Bloomsbury Conservation Area; and
- Central London Area.

Planning Statement

Heritage Impact

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (‘the Act’) sets out the statutory duty of decision makers considering applications for listed building consent development. In considering whether to grant listed building consent the decision maker shall:

¹ *Safe Rottingdean Ltd v Brighton and Hove City Council* [2019] EWHC 2632 (Admin).

“... have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

Development plan policy relating to the historic environment generally reflects the statutory provisions of section 16 and 72 of the Act and national policy.

A strategic policy of the NPPF is to conserve and enhance the historic environment. Paragraph 184 describes heritage assets as an:

“...irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.”

Paragraph 189 of the NPPF states that applicants should describe the significance of any heritage assets affected, including any contribution made by their setting. The paragraph goes on to state that the level of detail of that assessment should be proportionate to the asset's importance to understand the potential impact of the proposal.

Paragraph 193 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Paragraph 132 goes on to state that the more important the asset, the greater the weight should be, which is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm.

Policy HC1 of the Publication London Plan states that *“developments proposals affecting heritage assets and their setting should conserve their significance, by being sympathetic to the assets' significance and appreciation of their surroundings”*. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed.

At a local level, Policy D2 (Heritage) states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

The Site has evidential and historic value, as noted within the Site's listing, which primarily focuses on the building's materiality including the use of Portland Stone and metal framed windows, and its plan form. As set out above, the existing windows within the Building are not original, with those situated on the Malet Street elevation known to be replaced between 1995 and 2000.

The existing windows' profiles throughout the building vary and deviate from the character and design of the original windows, as shown in the comparison studies prepared by Rivington Street Studios. The existing windows also vary in quality as shown through the accompanying photographs. The variation in both the quality and design of the windows throughout the building, actively detracts from the historic significance of the listed building and the building's wider contribution to the character and appearance of the Conservation Area.

In light of this, it is considered that the proposed loss of the existing modern windows in itself, will not result in any heritage harm. Further, we are of the view that the proposed replacement windows, given that they faithfully reflect the design of the original windows and use steel, as originally intended, will actively enhance the historic significance of the listed building and its contribution to the character and appearance of the Conservation Area.

The proposed replacement windows draw directly from the original design of the 1920s, reintroducing the glazing pattern and more sensitively replicating the materiality and character of the original windows. By replacing all of the windows with the same system, the façade will regain its coherence and visual consistency which will be readily appreciable in views from the surrounding streets. The unusual reflection caused by the current glazing will also be remedied by the proposed development.

Overall, the proposals deliver heritage benefits which improve the architectural quality and integrity of the listed building, and also reinforce the contribution the building makes to the Bloomsbury Conservation Area, the character and appearance of which will be enhanced in this location.

In addition to the clear heritage benefits of the proposals, the replacement windows will also assist in improving the building's thermal performance. The existing windows, by their nature, provide little thermal assistance for the building. To improve the building's performance and ensure that the building achieves the latest energy requirements, it has become necessary to replace the windows. The proposed windows are targeted to achieve Building Regulations Part L2B requirements which specify a U Value of 1.8W/M2k.

Notwithstanding that the windows insitu are not original, if LBC identifies any harm with their removal, then in line with the requirements of Paragraph 193 of the NPPF, the environmental benefits of this proposal would, in our view, significantly outweigh any identified 'less than substantial' harm, which must necessarily be at the very lowest end of this categorisation.

The proposal therefore seeks to sensitively replace the current windows, which are not original, with a design which seeks to enhance the appearance of the building and the wider Conservation Area, and delivers sustainable benefits for the building.

Design

High quality and inclusive design is encouraged at all policy levels. The NPPF notes that good design is a key aspect of sustainable development, and should contribute positively to making places better for people. Part 12 of the NPPF outlines the requirement for good design and sets out, at Paragraph 127, that development:

- a) *“will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

Chapter 3 of the Publication London Plan reinforces the Mayor's commitment to ensuring the delivery of good quality designed developments, which reflect and respond to London's character. Policy D1 (London's form, Character and Capacity for growth) requires developments to respond to local context by delivering buildings and spaces that are positioned and are of a scale, appearance and shape that responds successfully to the identity and character of the locality.

At a local level, Policy D1 (Design) of the Local Plan requires developments to be of the highest architectural and urban design quality to improve the function, appearance and character of an area.

The proposed replacement windows, as set out above, have been sensitively selected to ensure their design is reflective of the 1926 original windows and as such, restore the original character of the building. Through implementing a building wide window replacement strategy, this will further ensure that continuity in the window design is achieved throughout the Site, again providing enhancement to the designated heritage asset and conservation area. The replacement of these windows with a cohesive design approach will therefore improve the appearance of the building. Further details of the design of the proposed window replacements are set out in the accompanying Design and Access Statement.

Conclusion

The proposed development seeks to replace the windows on the elevations fronting Malet, Keppel and Gower Street to improve both the quality of the windows but also the Building's energy performance. The replacement window specification has been carefully selected to ensure it replicates, as closely as possible, the original appearance of the building and as such, the character and appearance within the Bloomsbury Conservation Area.

The proposals therefore delivers a number of heritage benefits which improve the architectural quality and integrity of the listed building, whilst also reinforcing the contribution the building makes to the Bloomsbury Conservation Area, the character and appearance of which will be enhanced in this location. Furthermore, the replacement windows deliver significant environmental benefits to the listed building that should be weighed up in the planning balance.


In light of the above, the proposed development is consistent with both legislation and policy provisions set out above.

Administrative Matters

The Application Fee of £1,170 has been calculated in accordance with The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2021 (as amended). A payment of £1,195 (plus the £25 service charge) has been made via BACS transfer to the Planning Portal under planning portal reference: PP-09650614.

We trust that the enclosed information is in order and sufficient for LBC to validate the Application. However, please do not hesitate to contact Gareth Fox (020 7312 7492 / gareth.fox@montagu-evans.co.uk) or Nadine James (020 7866 8673 / nadine.james@montagu-evans.co.uk) if you require any additional information.

Yours sincerely,

**GARETH FOX**