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22 November 2021

**Via Planning Portal only**

Dear Sir/Madam

**FULL PLANNING APPLICATION - THE TOWN & COUNTRY PLANNING ACT 1990 (as amended)**

**ERECTION OF MEMORIAL SCULPTURE**

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

Please accept this covering letter as an accompaniment to this full planning application for a proposed memorial sculpture for those medics that have lost their lives due to the COVID-19 virus. This letter provides a summary of the site and the proposed development. Please also find enclosed a completed application form, site location plan, a full set of existing and proposed plans and associated Heritage Statement.

### **The site**

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

Within the existing courtyard are the grade II listed Remembrance Gates, erected to commemorate the BMA members who died in WWI, and the grade II\* listed fountain which remembers the men and women of the medical profession that died in WWII.

## **The proposal**

Full planning permission is sought for the installation of a memorial sculpture to honour healthcare workers that have lost their life during the COVID-19 pandemic.

## **Planning policy**

### *National Planning Policy*

The National Planning Policy Framework (NPPF) (2021) sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development which incorporates three specific strands – economic, environmental, and social. The following sections are relevant to the consideration of this application; Section 11 (making effective use of land), Section 12 (achieving well designed places), and Section 16 (conserving and enhancing the historic environment).

### *Local Planning Policy*

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

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

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

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

- Policy D1 – Design
- Policy D2 – Heritage
- Policy C5 – Safety and Security

#### *Camden Planning Guidance (CPG)*

- Artworks, statues and memorials (2019)
- Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

## **Planning analysis:**

### *Design and visual impacts:*

Camden Local Plan (CLP) Policy D1 seeks to secure high quality design in development that respects local context and character, preserves or enhances the historic environment and heritage assets, is

sustainable in design and construction, comprises details and materials that are of high quality and integrates well with surrounding streets and open spaces. This is reflected by London Plan (LP) Policy D4.

In addition to the above, the Artworks, Statues and Memorials CPG (2019) states that statues and memorials must be of the highest quality, from an artist who has been selected through a robust and transparent selection process.

The proposed installation has been designed by highly renowned sculptor Richard Tennenbaum, supported by Fairhaven Stone, an award winning company with highly skilled stone masons, carvers, sculptors, conservators and stone cleaners. By virtue of its height, scale and massing, the installation would be appropriately proportioned in the context of its location and would not therefore form an incongruous or unbalanced landscape.

The installation would be topically appropriate in terms of the history, context and purpose of the site and would not create a proliferation of artworks in this single location. For these reasons, the proposed installation is considered to be acceptable with regard to its impact on the character and appearance of the area.

*Heritage Impact:*

CLP Policy D2 states that The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments, historic parks and gardens and locally listed heritage assets. This is echoed by LP Policy HC1.

The artworks, statues and memorials CPG (2011) states that artworks and memorials will only be permitted where they are appropriate in terms of the history, context and purpose of a site. This must also relate to the associated conservation area, Bloomsbury.

The Bloomsbury Conservation Area identifies a number of memorials within its different sub areas and therefore memorials are a common feature within the surrounding context, thus making the development more appropriate.

The existing site comprises memorials for former medics losing their lives, the proposed sculpture to memorialise those lost due to the COVID-19 virus, is a fitting tribute within its context and therefore compliant with the history of the site, preserving modern history which is in line with Policy D2, HC1 and guidance found within the artworks, statues and memorials CPG (2011).

The sculpture will be located to the side of a private central courtyard and therefore views from the wider conservation area will be limited. With regard to the Grade II listed building, the sculpture follows similar development within the courtyard but at a more limited and proportionate scale therefore minimising its overall impact.

Please refer to the attached Heritage Statement for full details.

## Summary

As demonstrated in this letter the proposed works are considered to have an acceptable impact on the character and appearance of the building and area and associated heritage assets. The development is in full accordance with the relevant Development Plan policies, and it is therefore respectfully requested that planning permission be granted.

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

Yours faithfully

**Stuart Minty**  
**Director**  
**SM Planning**