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L 210106 RB Reuben College Asbestos LBC cover letter

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Dear Amy,

Listed Building Consent Application For Asbestos Trial Abatement
Radcliffe Science Library, South Parks Road, Oxford
On behalf of the Chancellor, Masters and Scholars of the University of Oxford
Planning Portal Reference: PP-09529143

Savills has been instructed as agent by the Chancellor, Masters and Scholars of the University of Oxford (hereafter 'the Applicant') to submit a Listed Building Consent Application for the following:

> *Works to facilitate a targeted asbestos trial abatement, including asbestos removal, strip out and repair, within room JF-09, and to one structural column within room JF-08, in the Jackson Wing of the Radcliffe Science Library*

The block plan and asbestos trial abatement first floor plan identify the rooms to which this listed building consent application relates to.

We enclose the following drawings and documents as part of this application:

Drawings

Drawing Name	Consultant	Reference
Location Plan and Block Plan	FJMT	SK210204
Asbestos Trial Abatement – First Floor	FJMT	SK210204
Asbestos Trial Abatement – Typical Details	FJMT	SK210210
Jackson asbestos trial abatement room JF-09 Cornice detail	Purcell	239945-PUR-00-01-DR-A-3200
Jackson asbestos trial abatement room JF-09 Skirting and window sill	Purcell	239945-PUR-00-01-DR-A-3201
Jackson asbestos trial abatement room JF-09 Door detail	Purcell	239945-PUR-00-01-DR-A-3202
Jackson ACM abatement to column room JF-08 Column details	Purcell	239945-PUR-00-01-DR-A-3203

Documents

- Supporting Statement from Oxford University Estates Services Compliance Team
- Heritage Statement by Purcell
- Repair Specification by Purcell
- Photo record of historic features by Purcell
- Methodology for asbestos removal by Asbestech

- Methodology for temporary removal and reinstatement of historic fabric by Heritage Projects Management

Background

Planning permission and listed building consent were granted on 31 July 2020 under references 20/0942/FUL and 20/0943/LBC at the Radcliffe Science Library (RSL), Abbot's Kitchen and west wing of the Inorganic Chemistry Laboratory (ICL) for the following in order to facilitate the conversion of the buildings for use by the new Reuben College.

> *Refurbishment and alteration of the Radcliffe Science Library, Abbot's Kitchen and west wing of Inorganic Chemistry Laboratory (D1 use) to enable use as a graduate college, museums' collections teaching and research centre and library (D1 use), including internal layout changes, new opening between Abbot's Kitchen/Jackson Wing and Inorganic Chemistry, removal of two bookcases in Jackson Wing first floor, insertion of raised floor at Inorganic Chemistry first floor, insertion of new kitchen, new dining hall and servery. Insertion of secondary glazing in Worthington Wing and Jackson Wing and replacement windows in Inorganic Chemistry. External works to include creation of new lift extension between Jackson Wing and Inorganic Chemistry Laboratory, new roof mounted plant equipment, insertion of new entrance to eastern elevation of Worthington Wing, creation of an accessible entrance to south elevation of Jackson Wing including remodelling existing footpath, new landscaping, provision of cycle parking and provision of external bin store.*

Following approval of these applications, survey work has shown that asbestos is present in a larger number of locations than anticipated which will require intrusive works including the removal of plaster throughout the majority of the buildings.

Several meetings have taken place with the City Council Conservation Officer to discuss the ongoing investigations and current proposals as detailed below.

Proposals

From asbestos testing that has been carried out within the Radcliffe Science Library, the University now knows which areas within the building are asbestos containing, however the University do not yet fully understand the range of options available in terms of removal or retention in situ and implications for future building users. The University has a duty of care towards the contractors detailed to carry out works within the building as part of the current Reuben College project, but also to those who will be using the building in the future.

The safest way forward in terms of asbestos management is to take the time to do a complete strip out of the building. However, although the regulations relating to safe management of asbestos need to be complied with, from a heritage perspective a complete strip out may not be desirable as it has the potential to be extremely intrusive and the University are keen to investigate fully all options available.

To remove large areas of asbestos from the building requires listed building consent. In order to compile the details required for a methodology to remove asbestos from the building, and to be sure that the proposed removal adopted is sufficient to meet the requirements of the asbestos management regulations whilst being the least damaging option to the building as a whole, it is critical for the University to understand the precise nature of the asbestos containing materials.

Of specific interest are the historic methods of application of the material, the way in which it meets at interfaces and junctions, the methods of removal which would be available and precisely how feasible or potentially destructive stripping the material might be. The only way of doing this is to undertake a more comprehensive strip out in a single, discrete location within the building. By doing this we would also seek to understand the potential pitfalls of attempting localised removals elsewhere in the building in terms of how to provide adequate

compartmentation around the possible areas of removal to prevent spread of the asbestos containing materials to other areas.

A single room on the first floor (room JF-09) has been identified which has all the elements of the building that we need to understand in terms of interface between walls, ceiling, floors, decorative plaster cornice, bookcases, door surrounds, window reveals and architraves, but which crucially does not form part of the principle suite of rooms within the Radcliffe Science Library and has much plainer architectural elements than are found in other areas. In addition, a single column within the Jackson Wing first floor reading room (room JF-08_ has also been identified. These locations are identified within the accompanying drawings.

A Heritage Assessment accompanies this submission and provides a comprehensive assessment of the significance of the room. A record of the historic fabric in the room is also submitted with this application.

Listed Building Consent has already been granted for the removal of the non-original bookcases within the space identified under consent 20/0943/LBC, so there will be no further loss of original joinery by virtue of this work. The space in question is among the smaller individual rooms within the building so the total loss of original fabric within the building will be kept to a minimum and is small compared with the building when taken as a whole. The bookcase around the identified column also has listed building consent for its removal under consent 20/0943/LBC.

This application is accompanied by a methodology for the asbestos removal which provides details of all the work proposed. [redacted]

Details of the historic features to be reinstated also accompanies this application alongside a specification for the reinstatement of plaster.

Subsequent listed building consent applications will be submitted for asbestos removal in the remaining parts of the building and will be informed by the work is this small area of the building.

Planning Policy

The Development Plan for Oxford comprises the Oxford Local Plan 2036 which was adopted in June 2020. The following policies are identified as relevant to this application:

- DH3 Designated heritage assets

Policy DH3 states, *"For all planning decisions for planning permission or listed building consent affecting the significance of designated heritage assets, great weight will be given to the conservation of that asset and to the setting of the asset where it contributes to that significance or appreciation of that significance"*

Paragraphs 189-190 of the National Planning Policy Framework (NPPF) are informative for consideration of this proposal.

Paragraph 189 requires an applicant *"to describe the significance of any heritage assets affected, including any contribution made by their setting."* The application is accompanied by a Heritage Statement from Purcell, who have a detailed knowledge of the RSL that has informed this proposal. Paragraph 190 requires the decision-maker to identify and assess the particular significance of any heritage asset that may be affected by a proposal, including its setting.

Paragraph 196 of the NPPF reads, *"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*

[redacted]

The single room to which this application relates has been carefully chosen to have the least harm to the listed building.

The Heritage Statement concludes that the works proposed to be trialled in the room are physically intrusive in nature and will consequently disturb the built fabric of the Grade II listed building. However, the impact is localised and reduced to the minimum amount necessary to best secure the condition of the whole building in the long term.

Where a proposed development will lead to less than substantial harm to a designated heritage asset, Policy DH3 of the Local Plan and paragraph 196 of the NPPF require the harm to be outweighed by public benefits.

The harm to the listed building due to the proposed works can be justified by the public benefits. The works involved are justified by the health and safety benefits of removing the asbestos and by replacing the asbestos containing plaster with a plaster similar to the building's original plaster as per Purcell's repair specification.

The building needs to be functional for its use and be safe for future building users. The works proposed as part of this listed building consent application will inform the approach that needs to be taken to asbestos removal throughout the rest of the building in order to safely facilitate the conversion of the buildings to Reuben College. The conversion of the buildings to Reuben College in itself has numerous public benefits that were assessed as part of the application 20/0943/LBC including improved accessibility throughout the buildings and ensuring the buildings function sufficiently to meet the modern-day needs of the collegiate, library, educational and research uses. This listed building consent application will also ensure the buildings function sufficiently and safely.

The public benefits of this application therefore outweigh any harm to the listed building and the proposal accords with Policy DH3 and paragraph 196 of the NPPF.

Overall, this proposal has been fully considered, justified and is compliant with local and national planning policy.

We trust you will be able to support this application. If you require any further information please do not hesitate to get in touch.

Yours sincerely

[redacted]

Rebecca Bacon MRTPI
Senior Planner