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## Planning Statement

4-6 Bedford Place, London, WC1B 5JD

City Planning Limited

on behalf of **Nebra Property 2022 Limited**

March 2023

**City Planning Ltd**

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# 1. INTRODUCTION

1.1 This planning statement is submitted on behalf of Nebra Property 2022 Limited (**the Applicant**) and accompanies a full planning and listed consent application for the following development (**the Application Proposal**) at 4-6 Bedford Place, London, WC1B 5JD (**the Site**):

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*“Restoration and refurbishment of the existing hotel (Class C1). Proposed works include: internal reconfiguration, ground and lower ground floor rear extensions, repairs and replacement of roof, new lift-overrun, alterations to the front and rear façade, installation of plant and landscaping works to the rear garden.*

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1.2 The Site is a Grade II Listed Building. The existing hotel is vacant and in need of refurbishment and modernisation. The Application Proposal seeks to upgrade the hotel so that it provides contemporary, inclusive visitor accommodation with a focus on visitor needs and expectations.

1.3 This submission is accompanied by a number of reports to assist the LPA when considering the Application Proposal. These are:

- Design and Access Statement (**DAS**) prepared by Studio Moren;
- Heritage Statement (**HS**) prepared by Spurstone Heritage;
- Energy Conservation Statement (**ECS**) prepared by EnergyLab;
- TM52 Overheating Assessment (**OA**) prepared by EnergyLab;
- Plant Noise Assessment (**PNA**) prepared by RBA Acoustics;
- Arboricultural Implications Assessment (**AIA**) prepared by David Archer Associates;
- Daylight, Sunlight and Overshadowing Study (**DSOS**) prepared by Model Environment;
- Planning Fire Safety Strategy (**PFSS**) prepared by Studio Fahrenheit; and
- Landscape Statement (**LS**) and Landscape Master Plan (**LMP**) prepared by Wright Landscaping and Architecture.

1.4 The Applicant has engaged with the Local Planning Authority (LPA), the London Borough of Camden (LBC), in preparing this application. This has resulted in detailed design discussions with the LBC Conservation Officer and the proposals have been carefully designed to provide sensitive and targeted improvements to the internal layout of the building. The proposals also seek to retrofit and upgrade the services, ensuring the longevity and energy efficiency of the building.

1.5 Granting planning permission and listed building consent for the Application Proposal will therefore deliver the following planning benefits:

- net increase of seven hotel bedspaces, which is a notable benefit supported by the London Plan and Camden Local Plan and will boost the local visitor economy;
- upgrading the hotel accommodation, ensuring it is fit for purpose and securing the listed building's optimum viable use;
- 60% improvement on the building's energy performance through the use of air source heat pumps and solar panels;
- significantly improving the accessibility of the building, meaning more people can use the hotel and enjoy the internal significance of the listed building;
- enhancement of the landscaping of the rear garden;
- enhancement of the front elevation of the Site through replacement of windows, bringing it in keeping with the streetscene; and
- enhancement of the rear elevation by infilling unoriginal windows and introducing a more consistent rhythm via the new closet wing extensions to match the massing of 1-3 Bedford Place.

1.6 For ease of reference, this Planning Statement is structured in the following way:

- **Section 2: Site and Surrounding Area** – Provides a detailed description of the Site and surrounding area.
- **Section 3: Planning History** – Sets out the planning history of the Site, as well as other relevant applications in the surrounding area.
- **Section 4: Pre-application** – Discusses the pre-application advice received from the LPA.
- **Section 5: Application Proposal** – Describes the principal elements of the Application Proposal.
- **Section 6: Planning Policy** – Outlines the development plan for the Site, supplementary planning documents and relevant planning designations.
- **Section 7: Planning and Heritage Considerations** – Discusses the material planning and heritage issues that are relevant in the assessment of the Application Proposal.
- **Section 8: Conclusions** – Sets out our conclusions.

## 2. SITE & SURROUNDING AREA

- 2.1 This section first describes the Site. This is followed by a description of the surrounding area, as it relates to the Application Proposal. This section should be read in conjunction with the existing plans, DAS and HS. The HS provides a detailed description of the external and internal detailing of the listed building, together with a series of photographs and images.

### The Site

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- 2.2 The Site is situated on the north-eastern side of Bedford Place (south-eastern end) and forms part of a larger Grade II listed terrace (Nos 1-20 in sequence). It consists of three former townhouses that are four storeys in height with basements. Photos of the front façade of the Site are shown on page 10 of the DAS. For completeness, the listing reads as follows:

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*“Symmetrical terrace of 20 houses forming the east side of Bedford Place, C1815. By James Burton. Multi-coloured stock brick with rusticated stucco ground floors. Stucco 3<sup>rd</sup> floor sill band. 4 storeys and basements. 3 windows each. Slightly projecting end bays (Nos 1-3 and 18-20) and central bays (Nos 8-12). Wide segmental-arched doorways with some patterned fanlights, sidelights and double half-glazed doors. Gauged brick flat arches (painted red) to recessed sash windows, some with original glazing bars. Continuous cast-iron balconies at 1<sup>st</sup> floor level, No.11 with arched trellis balcony with tented canopy. Parapets. INTERIORS not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas, some houses with area overthrows.”*

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- 2.3 The Site has operated as a hotel since the 1950s. Until recently, it was operated as a 3\* hotel, known as the Grange Lancaster, with a total of 36 rooms. There was a 24-hour reception at the ground floor level, together with a bar/lounge and restaurant. Guests were offered a range of services including breakfast, dry cleaning/laundry, parking and concierge. Rooms varied from ensuite to semi-ensuite (basic shower in the room). There were also communal toilets at every level. The number of rooms is broken down as follows:

Level	Guestrooms
Lower Ground	6
Ground Floor	3
First	9
Second	9
Third	9
<b>Total</b>	<b>36</b>

- 2.4 The hotel entrance is through 6 Bedford Place, as shown in Figure 1 below. There are two Sheffield Cycle Stands at the front of the hotel also shown in Figure 1. The properties have been linked together through their party walls by a corridor along the main staircase landings at

each level. The ground floor was made up of reception/lobby, dining room, lounge and entertainment spaces with bedrooms on the upper floors and kitchen, offices and staff common room in the basement. The building has had a soft strip out following the listed building certificate (LPA ref: 2022/2848/L) granted on 4<sup>th</sup> August 2022.



**Figure 1** – Entrance to Hotel.

- 2.5 In order to assess the level of heritage significance, the accompanying HS has produced significance plans for each floor. These are included on pages 19–21 of the HS and page 13 of the DAS. The internal parts of the whole listed building are classified and range from high significance (red) down to detracting from significance (brown).
- 2.6 The roofs of the three buildings have oval glazed lanterns over the primary staircases and half-butterfly slated roofs sloping up the party wall. The roofs are in a poor state of repair and there is evidence of water damage throughout the building (see page 5 of the DAS).
- 2.7 At the rear of the Site, 5 and 6 Bedford Place have two storey closet wings at the basement and ground floor level. On the rear façade, several small windows have been added. These are shown on page 11 of the DAS.
- 2.8 There are a number of low quality Category C trees in the rear gardens, as shown in the accompanying tree survey (TS).

## The Surrounding Area

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- 2.9 Bedford Place consists of two rows of terrace properties that are four storeys in height with basements. 1-20 is on the north-eastern side and 21-40 is on the south-western side. The entire street is to the southeast of Russell Square Gardens and is within the Bloomsbury Conservation Area. There are several hotels on the street, as well as private residences and a private members club.



2.10 Many hotels have been modernised over the years and lifts have been installed to allow for easy access to all floors. These include Lonsdale Hotel (9-10 Bedford Place), Grange Beauchamp Hotel (24-27 Bedford Place), Grange Portland Hotel (31-32 Bedford Place), Grange Clarendon Hotel (34-37 Bedford Place) and Grange Buckingham Hotel (39-40 Bedford Place). Details of these alterations are discussed on pages 19-21 of the DAS. Lift overruns form part of the roofscape terminating with flat roofs as shown in Figure 2 below.



**Figure 2** – Existing lift overruns (marked in yellow) set discreetly in the valley roofs of the neighbouring hotels at 24-27, 31-32, 34-37 and 39-40 Bedford Place with Site marked in red.

2.11 To the rear of the Site is a rectangular strip of private land owned by The Bedford Estate. It has one private access from the Bedford Estate offices on Southampton Row. It is unused and part of this land is shown in Figure 3 below. Also shown in Figure 3 are the extended two storey rear returns to 1-3 Bedford Place. 1-3 Bedford Place also have a series of solar panels on its roofs.



**Figure 3** – Shared amenity space at the rear of the Site & the new extensions & solar panels at 1-3 Bedford Place.

2.12 The Site is in a highly sustainable location and is close to several London Underground (LU) Stations. It has a Public Transport Accessibility Level (PTAL) of 6B, which is the highest. Details of the existing transport connections are discussed on pages 44-45 of the DAS. The Site is a short walk from the British Museum, the Royal Academy of Dramatic Art and the British Medical Association, as well as a number of highly ranked universities.



### 3. PLANNING HISTORY

3.1 This section first discusses the relevant planning history associated with the Site. It then examines a recent planning application at 1-3 Bedford Place, an application to add air source heat pumps at 33 Bedford Place and a list of planning permissions and listed building consents for lifts at Bedford Place.

#### The Site

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3.2 The Site has limited planning history relevant to this Application Proposal.

3.3 On 4<sup>th</sup> August 2022, a listed building certificate (LPA ref: 2022/2838/L) was granted confirming that soft strip out works could be undertaken.

3.4 On 28<sup>th</sup> November 2022, a planning (LPA ref: 2022/4189/P) and listed building (LPA ref: 2022/4723/L) consents were granted for repairs to the existing roof structure and replacement of roof covering. This included the removal of the existing asphalt, slate and sarking boards to allow for proper investigation of the existing roof and appropriate strengthening and repairs.

3.5 There is currently a live planning (LPA ref: 2023/0450/P) and listed building consent (LPA ref: 2023/1095/L) applications to replace the sashes of most of the windows on the front and rear elevation. This is due for determination on 10<sup>th</sup> April 2023.

#### 1-3 Bedford Place

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3.6 1-3 Bedford Place was formerly a hostel. Planning (LPA ref: 2011/0494/P) and listed building (LPA ref: 2011/0499/L) consents were granted in November 2011 for the following development (planning description of development):

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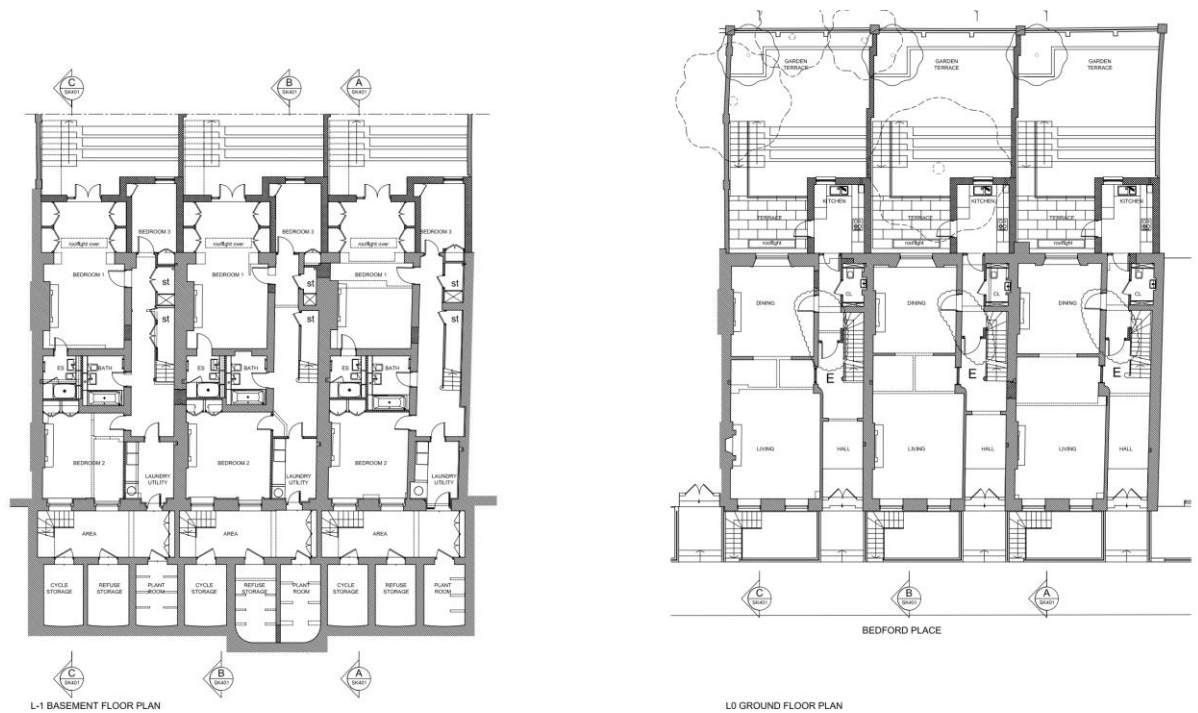
*“Change of use from student accommodation (Class C2) to 3x1 bedroom, 3x2 bedroom and 3 x 3 bedroom self-contained flats (Class C3) and erection of part single, part two-storey rear extensions at lower ground/ground floor level, incorporating terraces at rear ground floor level with staircases to garden and other associated alterations (following demolition of existing rear extensions).”*

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3.7 These consents allowed the erection of two storey closet wings at ground and basement levels for all three buildings.

3.8 Paragraph 6.16 of the officer’s delegated report accompanying that application sets out that the wings will enhance the regularity in appearance, which has been lost through alterations of windows and incongruous extensions.

3.9 In considering the living quality of the units, officers concluded in paragraph 6.30 of their report that the dwellings would ‘provide an excellent standard of residential accommodation in terms of layout, room sizes, ventilation and outlook’. This included outlook and light to ground floor and basement habitable rooms between the closet wings.



**Figure 4** – Consented basement and ground floor plan for approved closet wing extensions at 1-3 Bedford Place.

3.10 For clarification, these consented closet wings are nearly identical in terms of scale, location and appearance to those proposed in the Application Proposal. The Application Proposal seeks to remove non-original windows on the rear façade and restore this elevation.

3.11 The permission at 1-3 Bedford Place also granted consent for the PV panels on the roof.

### 33 Bedford Place

3.12 On 23<sup>rd</sup> August 2022, planning permission (LPA ref: 2022/2183/P) and listed building consent (LPA ref: 2022/2840/L) were granted at 33 Bedford Place for the following development (listed building description of development):

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*“Internal and external alterations including removal of the existing gas fired boilers, radiators and redundant pipework and the installation of new Air Source Heat Pumps, including 3 external condenser units within an acoustic enclosure in the rear garden and 1 condenser unit in the front vault, and 15 corresponding internal units.”*

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3.13 This heating and cooling method, including removing of all boilers, radiators and redundant pipework and replacing them with internal heating and cooling in the building and external air source heat pumps is very similar to what is proposed in the Application Proposal.

### **Lift Consents**

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3.14 The following properties in Bedford Place and surrounding area have had lifts granted over the years, in a very similar manner proposed in this application. These are shown on pages 19-21 of the DAS:

- 9-10 Bedford Place (LPA ref 2004/3033/L) – Granted 8<sup>th</sup> September 2004;
- 24-27 Bedford Place (LPA ref: LSX0105223) – Granted 9<sup>th</sup> May 2002;
- 31-32 Bedford Place (LPA ref: PSX0105473) – Granted 22<sup>nd</sup> October 2002;
- 34-37 Bedford Place (LPA ref: POSX0105492) – Granted 12<sup>th</sup> August 2002;
- 39-40 Bedford Place (LPA ref: PSX0204180) – Granted 11<sup>th</sup> February 2003;
- 12-20 Montague Street (LPA ref: 9773) – Granted 15<sup>th</sup> January 1971; and
- 23-24 Montague Street (LPA ref: CTP/N14/7/A/HB1465) – Granted 26<sup>th</sup> November 1976.

## 4. PRE-APPLICATION DISCUSSIONS

4.1 Prior to the submission of this Application Proposal, the Applicant sought pre-application advice (LPA ref: 2022/3645/PRE) (the Pre-application Advice) from LB Camden for the following development (the Pre-application Proposal) on the Site:

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*'Extension to lower ground and ground floor rear closet wings at nos.5 and 6, erection of new 2 storey one at no. 4, enlargement of rear lightwells, installation of a lift, including lift over-run, and internal alterations to the existing hotel.'*

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4.2 The Pre-application Advice was issued on 5<sup>th</sup> January 2023 following a pre-application meeting on Site. The Pre-application Advice concluded the following:

- **Rear extensions** – the rear extensions are likely to be acceptable, subject to detailing. The wings should be set further away from the windows in the main rear room and the external staircases removed.
- **Internal alterations** -
  - the proposed location of the lift at the back of the front room of no.5 and accordingly on the rest of the floors would not be supported as it results in an uncharacteristic alteration to the plan form;
  - the creation of apsidal walls at the first floor level to the rear rooms could be a benefit, where these were original;
  - removal of chimney breast to the smaller rear rooms would not be acceptable;
  - an opening in the spine wall between the entrance hall and front room of the middle building to create a reception area, would not be supported; and
  - the pod structures providing wet services in the rooms are likely to be acceptable. The inclusion of an upper level seating area results in excessive height and bulk. The historic proportion of the rooms would be more legible were the upper enclosures not included.
- **Amenity** – the Pre-application Proposal would not have an adverse impact on the amenity of the neighbouring occupiers in terms of overlooking. The rear extension at no.4 is considered to have an impact on the outlook and daylight in no. 3 based on desk-top assessment (45 degree line).
- **Energy** – future submission should be accompanied by an overheating strategy which fully assesses the cooling hierarchy.
- **Transport** – a full transport assessment will not be required as part of the future planning application, however, some transport information should be included on how development ties into the public highway and details of existing and proposed servicing arrangements. An increase of 9 hotel rooms would not trigger a cycle facility requirement.

4.3 In response to this advice, the following changes have been made to the scheme submitted as part of this Application Proposal:

- rear returns have been reduced in width and external staircases removed to nos. 4 and 6;
- the lift has been relocated to the rear of the building in no.5 behind the main staircase, which is consistent with the other implemented consents on the street;
- chimney breasts are now retained, including those within the new lift shaft;
- opening in the spine wall between the entrance hall and main front room of no.5 has been removed;
- the upper level seating area has been removed from all pod structures;
- a Daylight, Sunlight and Overshadowing Study (DSOS) confirms that the proposed rear extensions will not result in acceptable loss of daylight or sunlight to the neighbouring properties, including 3 Bedford Place. The outlook is also the same as that between 1 and 3 Bedford Place, which officers previously concluded was “excellent”;
- an Energy Conservation Statement (ECS) and Overheating Assessment (OA) have been prepared and accompany this submission, setting out the proposed heating and cooling strategy for the building and explaining the strategy to minimise on-site carbon emissions; and
- information on the existing transport connection, as well as existing and proposed servicing arrangements, has now been included on pages 44-45 of the DAS.

4.4 In summary, this Application Proposal has been carefully designed taking into consideration the Pre-application Advice. As discussed in the following sections of this Statement, the Application Proposal fully accords with the policies of the development and should be granted consent.

## 5. PLANNING POLICY CONTEXT

5.1 Section 38 (6) of the Planning and Compulsory Purchase Act (2004) requires that proposals shall be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this case, the Development Plan for the Site comprises of the following documents:

- The London Plan (LP) (2021); and
- Camden Local Plan (CLP) (2017).

5.2 In addition to the Development Plan, there are several documents that constitute material considerations when determining any future planning application. These include:

- National Planning Policy Framework (NPPF) (2021);
- Camden Planning Guidance (CPG) – Access For All (March 2019);
- Camden Planning Guidance (CPG) – Trees (March 2019);
- Camden Planning Guidance (CPG) – Design (January 2021);
- Camden Planning Guidance (CPG) – Amenity (January 2021); and
- Camden Planning Guidance (CPG) – Energy efficiency and adaptation (January 2021).

5.3 The Site has the following planning designations:

- Central London Area; and
- Bloomsbury Conservation Area.

5.4 The Site has a low risk of surface water flooding and is in Flood Zone 1.



## 6. DETAILS OF THE APPLICATION PROPOSAL

- 6.1 There are two parts to the Application Proposal. Those works that require planning permission and those works that only require listed building consent. For the avoidance of doubt, the works that require planning permission will also require listed building consent. Prior to discussing these issues, details of a potential operator are provided.

### Potential Operator

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- 6.2 The Applicant is in discussions with the potential hotel operator Zetter Hotels Group. Zetter's portfolio includes three boutique hotels in London, including Grade II listed townhouses in Marylebone and Clerkenwell. Images of their product are shown on page 6 of the DAS. The Group is experienced in managing listed properties with particular emphasis on sustainability and environmental awareness in their hotel operations.
- 6.3 The refurbished hotel will provide a total of 43 rooms, three of which will be accessible. A breakdown of rooms is provided in Table 1 below.

**Table 1**

<b>Level</b>	<b>Guestrooms</b>	<b>Accessible Guestrooms</b>
Lower Ground	10	1
Ground Floor	6	2
First	9	0
Second	9	0
Third	9	0
<b>Total</b>	<b>43</b>	<b>3</b>

- 6.4 Servicing and deliveries will take place from the front, as existing. Waste will be stored in the front basement vaults until they are collected by a private waste collector.

### Works that Require Planning Permission

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- 6.5 The Application Proposal seeks to extend the existing closet wings at lower ground and ground floor level on 5 and 6 Bedford Place and erect a new two storey closet wing on 4 Bedford Place. All three new closet wings will have the same dimensions. They will be approximately 3.5m wide and 4m deep. They will be built using materials that match the existing. Internally, the extensions will contribute to the creation of five rooms and a storage room at ground floor level. A lightweight glass conservatory will also be constructed at the rear of no.5, infilling the space between the rear returns of nos. 5 and 6.

- 6.6 As a result of the provision of a new lift, there will be a lift overrun on the roof of 5 Bedford Place. The lift overrun can be seen on the proposed elevation drawings. It will be discrete and very modest in scale and located in the centre of the roof.
- 6.7 Also at the roof level, a total of 25 photovoltaic (PV) panels will be installed to support energy generation on Site, similar to that of 1-3 Bedford Place. Eight PV panels will be located on each roof of nos. 5 and 6. Further nine panels will be installed on the roof of no.4. These will be set discretely on the southeast slope of the roof opposite the existing lanterns.
- 6.8 In terms of works in the rear gardens, four Category C Cabbage Palms (T2-T5) and two Category C Leyland Cypresses (T6-T7) will be removed. For clarification, T7 is subject to a separate Tree Works Consent application (LPA ref: 2023/0784/T) currently under determination by the Council. Removal of T7 is included in this submission for completeness. A total of 10 replacement trees will be planted across three gardens as shown on the accompanying Landscaping Master Plan. These will include three pleached Hornbeams, four Birches, two Table Dogwoods and a Judas Tree.
- 6.9 Finally, Air Source Heat Pumps (ASHP) will be installed to provide heating and cooling for the hotel. A total of seven units will be installed within two enclosures at the rear of the gardens of nos. 4 and 6 with four units at the rear of no.6 and three units at the rear of no.4. The details of the units and their arrangement are set out in sections 5.1-5.2 of the PNA. Enclosures will be painted green to match the planting and incorporated within the landscaping.

### **Works that Require Listed Building Consent**

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- 6.10 In order to avoid repetition, the HS provides a detailed description of the listed building works in paragraphs 4.8 to 4.39 and again in the impact table on pages 28-33. This is supplemented with Scope of Works with images set out on pages 41-42 of the DAS, as well as on the proposed layout and elevation plans.
- 6.11 For ease of reference though, the following works are proposed:
- The erection and extension of rear returns at lower ground and ground floor level;
  - The erection of a glazed conservatory at ground floor level of no.5;
  - The removal of non-original windows on the rear elevation (see page 27 of the DAS);
  - The installation of a lift including lift over-run (see page 28 of the DAS);
  - The installation of a chair lift from lower ground to ground level at no.6;
  - In rooms with high ceilings, the insertion of a 'pod' bathrooms and storage that are independent of the historic architecture (see pages 34-36 of the DAS);

- In rooms with lower ceilings partitions have been configured to make en-suite bathrooms;
- A series of partition changes at lower ground, ground, first, second and third floor levels; and
- Bricking up of the existing opening between rear gardens of nos.5 and 6 and creation of two new openings between gardens of nos. 4 and 5 and nos. 5 and 6.

6.12 For clarification, a lift is necessary to make the hotel inclusive for future guests, visitors and employees of the hotel. The stair lift is needed for fire safety.

6.13 Bedrooms will be expected to provide modern heating and cooling services, as detailed in the ECS and OA that form part of this submission.

## 7. PLANNING AND HERITAGE CONSIDERATIONS

7.1 This section sets out the key planning considerations, as follows:

- Land use;
- Design and heritage impact;
- Energy and sustainability;
- Impact on amenity;
- Noise;
- Trees and landscaping;
- Transport and servicing; and
- Fire safety.

7.2 Each is discussed in turn below.

### Land use

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7.3 Policy E3 of the Camden Local Plan recognises the importance of tourism to Camden's economy. Policy E13 of the London Plan also recognises the importance of visitor infrastructure. Paragraph 6.10.2 of the supporting text explains that London has a need for an additional 58,000 visitor bedspaces by 2041, which is an average of 2230 a year.

7.4 The upgrading of the existing hotel and the provision of seven additional rooms on a street characterised by hotels, in a CAZ location close to key visitor attractions, contributes to these targets and is a clear planning benefit.

7.5 The upgrading of the hotel also secures the listed buildings optimum viable use and ensures its long term preservation for enjoyment by visiting members of the public.

7.6 These public benefits should be strongly supported and weigh in favour of the planning balance.

### Design and heritage impact

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7.7 This section discusses the design and heritage impact of the proposed rear extensions, removal of non-original windows, installation of lift and lift-override, as well as internal alterations in turn below. It should be read alongside the HS prepared by Spurstone Heritage.

- 7.8 Policy D1 of the CLP discusses *Design*. Policy D2 seeks to preserve and enhance LBC heritage assets.
- 7.9 Paragraph 202 of the NPPF states that *"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"*.

### **Rear extensions**

- 7.10 In response to the above policies, the proposed closet wings will respect the local context and character and will be built using materials that match the existing with appropriate detailing. They will be nearly identical in scale and appearance to the extensions at 1-3 Bedford Place. The proposed conservatory extension at no.5 will be modest in size and set between the rear returns of nos.5 and 6. It will be set back from the building line of the new closet wings and will be clearly distinguishable as a modern and subordinate addition. As such, the proposed extensions will be appropriate to the local context and in keeping with the character and appearance of the area.
- 7.11 In terms of heritage considerations, as set out in paragraph 4.12 of the HS and the corresponding Impact Assessment Table, the rear extensions will preserve the character and appearance of the conservation area and together with 1-3 Bedford Place, will reinstate the rhythm and proportions of the historic closet wings. Whilst the lightweight glass conservatory will have minimal visual impact and allow for the historic structure and brick fabric of the listed building to remain clearly visible.
- 7.12 For the above reasons, the extensions to the rear will accord with D1 and D2 of the CLP.

### **Removal of non-original windows**

- 7.13 The removal of the non-original windows will be beneficial, as it will restore the historic appearance of the rear elevations. For the above reasons, the alterations to the rear will improve the appearance of the listed building and accord with policies D1 and D2 of the CLP.

### **Installation of Lift and Lift Overrun**

- 7.14 Policy D1 of the CLP requires that development will be inclusive and accessible for all. In addition, Policy C6 of the CLP seeks to remove the barriers that prevent everyone from accessing facilities. Specifically, it states:

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*'We will:*

*(a) Expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all'*

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- 7.15 Whilst located in Central London amidst many visitor attractions, the existing hotel is not currently accessible. This Application Proposal proposes a new lift to make the refurbished hotel inclusive, safe and accessible for all. In addition, despite not being a policy requirement for a refurbished hotel, three rooms will be accessible, which represents 7% of all the rooms in the refurbished hotel. Full details of the accessibility provisions that form part of this Application Proposal are outlined on pages 46-47 of the DAS and in our view this is a significant planning benefit.
- 7.16 As set out on page 28 of the DAS, when considering the location of the proposed lift, a sequential approach has been taken that examines three locations (A-C). The final choice of Location A was informed by pre-application discussions, a review of the surrounding area and Historic England's guidance *Easy Access to Historic Buildings* (2015).
- 7.17 The lift will be located at the rear of the main staircase in no.5 and will open up into the main staffed lounge at ground floor level. This will ensure ease of access throughout all three buildings and allow for safe and dignified evacuation in case of fire. Furthermore, the change to the historic plan form and circulation will be negligible. The existing windows at the first, second and third floor levels behind the lift will be retained and fitted with rear fixed mirror spandrels. This will ensure that there will be no impact on the rear elevation of the building. As discussed in the *Planning History* section of this Statement, this lift location has been considered acceptable elsewhere in the terraces of Bedford Place.
- 7.18 In terms of the lift overrun, it will only involve a small intervention at the rear of the roof of no.5, which is consistent with alterations made to a number of other buildings on the street, as described in paragraph 3.14 of this Statement. The overrun will not be visible in any public views from Bedford Place or surrounding streets, due to its location at the rear and the location of the Site within a large block. It will be very slightly visible in limited private views, but it will be clad in lead to give it a traditional finish and appearance. Again, this is entirely consistent with a number of other properties on Bedford Place and Montague Street.
- 7.19 As discussed in paragraphs 4.25 and 4.29-4.30 of the HS, the lift will cause less than substantial harm to the listed building, as there will be a loss of fabric at all levels. However, as it will create a more inclusive and accessible environment, there will be a clear and considerable public benefit. The installation of the lift will also support the continuation of the optimum viable use for the listed building, which is also a public benefit.



7.20 This approach is supported in paragraph 4.99 of the CLP, which states:

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*'The Council will balance the requirement to provide access with the interests of conservation and preservation. We will seek sensitive design solutions to achieve access for all, to and within listed buildings.'*

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7.21 With all the above in mind, this Application Proposal will remove the existing barriers to access, ensure safe means of escape and reflect modern hotel standards whilst sensitively adhering to the plan form of the existing listed building.

### **Internal Alterations to the Listed Building**

7.22 As set out in the Impact Assessment Table and associated paragraphs 4.32-4.37 of the HS, most of the internal alterations will be beneficial, particularly on the upper floors. In particular, restoration of the first floor rear room in no.4 to its original proportion, plan and decoration will be a substantial heritage benefit. The alterations at the ground floor level to insert the bathrooms will cause less than substantial harm. These works are required to support the hotel use and provide modern, accessible rooms, which results in a clear public benefit. Similarly, the installation of a stair lift in the staircase of no.6 from the lower ground to ground floor will ensure that safe and dignified means of evacuation are available. These alterations are reversible and again deliver the benefits of improved fire safety and accessibility to this listed building.

7.23 The installation of pods at the first floor level and the partition changes at the second and third floor level will reveal chimney breasts and fireplaces. The pod approach allows a clear distinction between old and new, and also allows much of the suspended ceilings to be removed, revealing original cornicing and giving a better understanding of the original proportions of rooms. These are all beneficial impacts and were supported at pre-application.

7.24 As concluded in paragraph 4.41 of the HS, the overall balance of heritage impacts of this Application Proposal is positive. Any potential harm is outweighed by the sensitive repair and refurbishment of the listed building that will sustain, enhance and better reveal its significance.

### **Energy and sustainability**

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7.25 Policy CC1 of the CLP requires all development to reduce carbon dioxide emissions through following steps in the energy hierarchy. Policy CC2 also requires development to adopt measures to reduce the impact of overheating. In addition, when considering energy and sustainability measures in listed buildings, paragraph 7.56 of the CLP states:

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*'Historic buildings including those in conservation areas can be sensitively adapted to meet the needs of climate change and energy saving while preserving their special interest and ensuring their long-term survival. In assessing applications for retrofitting sustainability measures to historic buildings, the Council will take into consideration the public benefits gained from the improved energy efficiency of these buildings.'*

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- 7.26 Despite not being a requirement for applications proposing less than 500sqm of new floorspace, the details of the energy strategy have been set out in the Energy Conservation Statement (ECS) and Overheating Assessment (OA) that accompany this submission.
- 7.27 The applicant has reviewed the most appropriate renewable energy options to deliver on site carbon emission reductions and reduce the potential for overheating, as set out in Appendix 1 of the ECS and section 3 of the OA. As a result, this Application Proposal seeks to install air source heat pumps (ASHPs) in the rear gardens of nos. 4 and 6 and photovoltaic (PV) panels on the southeast slopes of all three roofs. Together these measures will result in the potential to reduce carbon emissions on site by 60% compared to existing, which goes way beyond the policy requirements for a minor development in a listed building and we consider it to be a significant planning benefit.
- 7.28 The ASHPs will be located discretely at the rear of the gardens in an appropriately designed acoustic enclosure to ensure there is no adverse impact on noise and the appearance of the surrounding area. Whilst the PVs will be located on the southeast roofslopes, obscured by the existing parapets and will not be visible from any public views. This approach is consistent with the strategies taken at 33 Bedford Place (ASHP's) and 1-3 Bedford Place (solar panels).
- 7.29 This energy and services strategy will also allow updating heating and cooling, electrical wiring, domestic water services, fire safety and building security in the building. These works are necessary to upgrade the servicing of the building and bring it up to a modern standard, helping to secure its ongoing optimum viable use.
- 7.30 As such, the Application Proposal goes above and beyond the policy requirements of the development plan. The works will sensitively adapt the listed building to meet the needs of climate change and energy saving, whilst preserving its special interest and ensuring its long-term survival.

### **Impact on amenity**

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- 7.31 Policy A1 of the CLP relates to *Managing the Impact of Development*. The policy sets out that development will be granted unless it causes unacceptable harm to the amenity of neighbours in respect of sunlight, daylight, overlooking and privacy.

- 7.32 When considering the impact on daylight and sunlight, this submission is accompanied by Daylight, Sunlight and Overshadowing Study (DSOS) prepared by Model Environments. DSOS considers the impact of the proposed rear extensions on the six windows on the rear elevations of 3 and 7 Bedford Place, as shown on page 10 of the DSOS. As concluded on page 14 of the DSOS, there will be no impact on daylight and sunlight of the neighbouring properties in accordance with BRE guidance. Furthermore, there will also be no change in access to sunlight to the neighbouring rear garden of no.3.
- 7.33 In terms of outlook, the proposed relationship between the rear extension at no.4 and the rear ground floor window of no.3 would be similar to that consented between nos. 1 and 2 and nos. 2 and 3. In granting those consents (LPA ref: 2011/0494/P and 2011/0499/L), the LPA took the view that the quality of the accommodation in nos.1 and 2, including outlook, was excellent , as described at paragraph 3.9 of this Statement. Therefore, given the relationship is virtually identical, it is considered that there will also be no unacceptable impact on the outlook from no.3. It will still be provided with excellent living conditions in the same way as no.1 and no.2 are.
- 7.34 In terms of privacy, there are no windows proposed on any of the flank elevations and, therefore, the relationship between the Site and neighbouring properties will be the same as existing. As a result, there will be no loss of privacy to 3 Bedford Place.
- 7.35 In light of this, the proposed rear extensions will not be detrimental to the amenity of 3 Bedford Place. The extensions will replicate the rhythm of the existing extensions in the terrace and the level of impact will be no different than that of 1 and 2 Bedford Place. Therefore, the extensions will accord with Policy A1 of the CLP.

## Noise

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- 7.36 Policies A1 and A4 of the CLP seek to ensure that noise and vibration is controlled and managed. Permission for noise generating development will only be granted if it can be operated without causing harm to amenity. Specifically, Appendix 3 of the CLP requires that for plant rating level should be designed to be 10dB below background noise levels. In response, this submission is accompanied by a Plant Noise Assessment (PNA) prepared by RBA Acoustics. It provides detailed analysis of the impact of the proposed ASHP operation on neighbouring occupiers.
- 7.37 A background noise survey was carried out to establish the background noise levels at the rear of the Site. The results of the survey are set out in section 3.4 of the PNA. In accordance with LBC noise thresholds, the plant noise should not exceed noise levels at 39dBA for daytime and 31dBA for night-time. In order to meet these criteria, the installation of acoustic enclosures

surrounding ASHPs are recommended. The details of the required enclosures are set out in section 5.6 of the PNA. As concluded in section 7 of the report, subject to the installation of the proposed acoustic enclosures, the proposed ASHPs will be within the LBC criteria for noise emissions. Therefore, the installation of the ASHPs will not result in any adverse impact on the amenity of the neighbouring residents in accordance with the requirements of the development plan.

## Trees and landscaping

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- 7.38 Policy A3 of the CLP is concerned with *Biodiversity*. The Council expects replacement trees or vegetation to be provided where loss has been justified and expects additional trees and vegetation to be incorporated, wherever possible. Furthermore, Policy D1 requires that development incorporates high quality landscape design and maximises opportunities for greening. In response, this submission is accompanied by an Arboricultural Implications Assessment (AIA) prepared by David Archer Associates and Landscape Statement (LS) and Landscape Master Plan (LMP) prepared by Wright Landscape and Arboriculture.
- 7.39 Section 1.3 of the AIA describes the existing trees on Site and concludes in paragraph 1.3.5 that all trees have been assigned Category C due to their small size, limited public visibility, indifferent quality and limited landscape value. It is considered that all six trees can be readily replaced with more appropriate species and their removal will not have any significant impact on the local amenity or quality of the landscape of the Conservation Area.
- 7.40 Section 2.3 of the AIA and LS set out the proposals for the replacement planting of 10 trees, one tree-like shrub and other vegetation in planters and pots. In addition, existing concrete slab paving will be replaced by reclaimed York Stone, which is more appropriate to the setting and period of the listed building. The details of the soft and hard landscaping are shown in the accompanying LMP.
- 7.41 In summary, the Application Proposal will result not only in like for like replacement, but also a significant enhancement in the number of trees and quality of biodiversity provision on site within constrained small rear gardens, in accordance with policies of the development plan.

## Transport and servicing

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- 7.42 The details of the existing on-street servicing arrangements are set out on page 45 of the DAS. The refurbished hotel will no longer provide restaurant service. Therefore, the number of deliveries and servicing is expected to be reduced. The servicing will continue to take place on street at the front of the Site. Whilst there will be a small increase in the number of rooms and

therefore more guests, it is not considered material in highway terms, as stated by officers in the pre-application response.

- 7.43 It is also worth noting that this is in an exceptionally accessible location close to a number of tourist attractions, and many tourists will complete trips by foot or public transport. In light of this, there will be no material impact upon the highway network.

## **Fire safety**

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- 7.44 This submission is accompanied by Planning Fire Safety Statement (PFSS) prepared by Studio Fahrenheit, which describes the proposed fire safety measures in section 4. These include the introduction of simultaneous evacuation strategy, refuge areas, installation of fire detection, compartmentation across the building, as well as the use of appropriate construction methods and materials. In particular, the proposed installation of an evacuation lift to all floors and a stair lift between lower ground and ground floors will significantly improve the safety of the existing building and ensure safe and dignified means of escape for all, in accordance with the requirements of Policy D12 (A) of the LP.

## 8. CONCLUSIONS

- 8.1 The existing hotel requires complete refurbishment, as its dated layout with separate bathrooms is simply not suitable for a modern hotel. This Application Proposal seeks to upgrade and modernise the existing hotel so that it provides appropriate facilities and secures the optimum viable use of the listed building.
- 8.2 To achieve this, a lift will have to be provided in order to promote an inclusive and safe environment and en-suites as well as modern services will need to be installed in each room. Whilst there will be some less than substantial harm to the building primarily as a result of the lift, as set out in the conclusion to the HS, 19 of the 26 proposals will have a beneficial or neutral impact on heritage significance. As a result, the overall heritage balance would be positive and any works identified to have less than substantial harm would be outweighed by the heritage benefits and the public benefits, including securing the ongoing optimum viable use of this listed building, in line with paragraph 202 of the NPPF.
- 8.3 In addition to this, the proposed extensions to the rear of the building will provide additional rooms to the hotel, thereby increasing the amount of visitor accommodation provided in this central location. This will benefit the local economy.
- 8.4 Finally, the proposed ASHP and PV will deliver a significant reduction in on site carbon emissions to ensure sensitive retrofitting and longevity of the listed building.
- 8.5 In light of the above, this Application Proposal is considered to accord with the development plan and, in our view, should be granted to secure the following planning benefits:
- net increase of seven hotel bedspaces, which is a notable benefit supported by the London Plan and Camden Local Plan and will boost the local visitor economy;
  - upgrading the hotel accommodation, ensuring it is fit for purpose and securing the listed building's optimum viable use;
  - 60% improvement on the building's energy performance through the use of air source heat pumps and solar panels;
  - significantly improving the accessibility of the building, meaning more people can use the hotel and enjoy the internal significance of the listed building;
  - enhancement of the landscaping of the rear garden;
  - enhancement of the front elevation of the Site through replacement of windows, bringing it in keeping with the streetscene; and
  - enhancement of the rear elevation by infilling unoriginal windows and introducing a more consistent rhythm via the new closet wing extensions to match the massing of 1-3 Bedford Place.