

<b>Address:</b>	21 Bloomsbury Street London WC1B 3HF		<b>2</b>
<b>Application Number(s):</b>	2022/4361/P	<b>Officer: Adam Greenhalgh</b>	
<b>Ward:</b>	Bloomsbury		
<b>Date Received:</b>	10/10/2022		

**Proposal:** Alterations to existing building comprising: rear extension at second to fifth floor levels with associated terraces, relocation of existing sixth floor/roof-top plant enclosure and erection of an additional (sixth storey) of offices on the existing roof (with new dormer windows and louvres in the Bedford Avenue and Bloomsbury Street roofs to serve the new sixth floor extension) formation of pavilion, external terraces and green roof at sixth floor level and on roof of new sixth floor extension (and an extended lift over-run), replacement of windows; alterations to entrances; replacement of faux chimney stacks and associated works.

**Background Papers, Supporting Documents and Drawing Numbers:**

Existing:

4677 ST EX: 01 001 (Site Location Plan), 01 002 1 (Site Plan)

4677 ST XX: 00 PL A 02-100EXPL (Existing ground floor plan), 01 PL A 02-101EXPL (Existing first floor plan), 02 PL A 02-102EXPL (Existing second floor plan), 03 PL A 02-103EXPL (Existing third floor plan), 04 PL A 02-104EXPL (Existing fourth floor plan), 05 PL A 02-105EXPL (Existing fifth floor plan), 06 PL A 02-106EXPL (Existing sixth floor plan), 07 PL A 02-107EXPL (Existing roof floor plan), LG PL A 02-099EXPL (Existing lower ground floor plan), XX PL A 03 100EXPL (Existing east elevation), XX PL A 03 101EXPL (Existing north elevation), XX PL A 03 102EXPL (Existing west elevation), XX PL A 03 103EXPL (Existing south elevation), XX PL A 04 100EXPL (Existing section AA)

Proposed:

4677 ST XX: 00 PL A 02-100PL (Proposed ground floor plan), 01 PL A 02-101PL (Proposed first floor plan), 02 PL A 02-102PL (Proposed second floor plan), 03 PL A 02-103PL (Proposed third floor plan), 04 PL A 02-104PL (Proposed fourth floor plan), 05 PL A 02-105PL (Proposed fifth floor plan), 06 PL A 02-106PL (Proposed sixth floor plan), 07 PL A 02-107PL (Proposed seventh floor plan), 08 PL A 02-108PL (Proposed roof plan), LG PL A 02-09PL (Proposed lower ground floor plan), XX PL A 03 100PL (Proposed east elevation), XX PL A 03 101PL (Proposed north elevation), XX PL A 03 102PL (Proposed west elevation), XX PL A 03 103PL (Proposed south elevation), XX PL A 04 100PL (Proposed section AA)

Documents:

Covering Letter (Gerald Eve 06/10/2022); BREEAM Pre-Assessment (SWECO – August 2022), Construction/Demolition Management Plan (LB Camden/Momentum Transport Consultancy – October 2022), Design and Access Statement (Stiff & Trevillion – October 2022), Energy & Sustainability Statement (SWECO – October 2022), Daylight & Sunlight Report (Lumina – July 2022), Framework Delivery & Servicing Plan (Momentum Transport Consultancy – October 2022), Framework Travel Plan (Momentum Transport Consultancy – October 2022), Statement of Community Involvement (Kanda – August 2022), Townscape, Heritage and Visual Assessment (KM Heritage – July 2022), Planning Statement (Gerald Eve – October 2022), Transport Statement (Momentum Transport Consultancy – October 2022), Planning Report for Acoustics (SWECO – August 2022)

**RECOMMENDATION SUMMARY: Grant conditional planning permission subject to a section 106 agreement**

<b>Applicant:</b>	<b>Agent:</b>
Capital 38 Limited	Gerald Eve One Fitzroy 6 Mortimer Street London W1T 3JJ

**ANALYSIS INFORMATION**

<b>Land Use Details:</b>			
	Use Class	Use Description	Floorspace (GIA sqm)
Existing	E - Offices		9841 sqm
	<b>TOTAL</b>		<b>9841 sqm</b>
Proposed	E – Offices		10,560 sqm
	<b>TOTAL (uplift = 719 sqm)</b>		<b>10,560 sqm</b>

<b>Parking Details:</b>		
	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	0	0
Proposed	0	0

## **OFFICERS' REPORT**

**Reason for Referral to Committee: Non-residential development involving the construction of a building or extension resulting in an increase of more than 500sqm of non-residential floor-space [Clause 3 ii)].**

### **EXECUTIVE SUMMARY**

21 Bloomsbury Street is a significant 6 storey (plus basement) historic building occupying a large corner plot formed by Bloomsbury Street to the east and Bedford Avenue to the north. The original building, constructed in the 1890's is considered to be high-quality Victorian architecture, featuring primarily red brick walls punctuated with stone detailing. The building is not listed, although it is identified as a 'positive contributor' in the Bloomsbury Conservation Area Appraisal.

The building has been subject to significant alterations including replacement of the roofs, chimneys and facades, the addition of atrium glazing in the 1990's and a second floor rear extension with terrace in 2014.

The traditional slate roof coverings on the Bedford Avenue and Bloomsbury Street façades were substantially replaced as part of the 1990's redevelopment. Modern faux chimney stacks have been installed on both facades (in the 1990's) and the south and west facing (i.e. rear) façades were also replaced in the 1990's. These works were permitted under planning permission 8703577 (17/09/1987).

In 2022 a Certificate of Lawfulness (2022/0189/P) was granted for partial infill of the existing atrium to create additional office floorspace.

Planning permission is sought for the re-location of existing roof-top plant into a designated enclosure to enable a sixth storey (roof-top) office extension behind a new level of dormers in the roof facing Bedford Avenue.

The sixth storey office extension will have external terraces and an amenity pavilion and loft over-run above. The roof will be part green and part paved, also for use as a terrace.

Rear extensions with associated external terraces are also proposed at 2<sup>nd</sup> to 5<sup>th</sup> floor level.

Existing windows will be replaced on a like-for-like basis on both street facing elevations, alterations to the entrances on Bloomsbury Street will be undertaken and the replacement of faux chimney stacks and associated works.

The provision of additional office floorspace is acceptable in principle under the Council's policies for growth (Policy G1) and economic development (Policy E1) however, under Policy H2 developments which involve the addition of 200sqm or more of new commercial floorspace in the Central Activities Zone should provide 50% residential floorspace.

The applicant has demonstrated that due to housing standards, Building Regulations and other planning constraints, including the potential impact on the appearance of the building and use of the office floorspace, associated with the formation of any residential floorspace, residential units cannot functionally be provided at the site. A financial appraisal has been undertaken and the Council's financial consultants, BPS, have agreed that the provision of on-site housing is also not viable.

The applicant does not own any other sites in Camden which could be used to provide the requisite housing and it has therefore been agreed that in this instance the provision of housing required under policy H2 can be met by way of a payment-in-lieu. The applicant has agreed to pay £539,250 which is the full policy requirement under the Council's Housing CPG.

Due to the siting and design, the proposed rear and roof-top extensions together with the replacement windows and chimneys on the Bloomsbury Street and Bedford Avenue elevations, new dormer windows on the Bedford Avenue elevation and upgraded entrances on the Bloomsbury Street elevation, would not detract from the heritage or townscape quality of the building or Conservation Area or the setting or appearance of any Listed building. The proposed works would preserve and enhance the conservation area.

Due to the siting and size/layout of the proposed extensions, there would be no loss of amenity for any neighbouring occupiers by way of loss of outlook, light, privacy or security. Subject to a condition to prevent the unrestricted use of the external terraces, there should be no loss of amenity for any neighbouring occupiers by way of unacceptable noise or disturbance.

Objections have been received in relation to the potential adverse effects on the safety and efficiency of the highway, removal of residents' parking spaces and noise, nuisance and disturbance during construction. A Construction Management Plan (to be submitted, agreed and implemented under a legal agreement) would ensure that there was no undue harm to the safety or free-flow of the highway or undue nuisance caused by contractor vehicles.

As such, the proposed development is considered to comply with the requirements of local and national policies and guidance and it is recommended that conditional planning permission is secured subject to a section 106 legal agreement to secure the Construction Management Plan (CMP) with implementation support fee and bond, and a highways contribution.

## **1 SITE**

- 1.1 No. 21 Bloomsbury Street occupies the corner plot of Bloomsbury Street and Bedford Avenue. The building is in commercial use and is set over basement, ground, and five upper floors. The two primary facades, which face onto Bloomsbury Street and Bedford Avenue, are of high-quality Victorian architecture, featuring primarily red brick punctuated with stone detailing. It is typical of a late Victorian, red brick mansion block with Dutch gables, expressive chimney stacks and pots, Portland stone banding, projecting bays and corner towers. The building is not listed, although it is identified as a 'positive contributor' in the Bloomsbury Conservation Area Appraisal.
- 1.2 The building is entirely in office use and it has a basement which is half in use for offices and half for plant and services. The building has a central atrium which extends from the basement to the top floor (see 'Planning History' below) and the Bedford Avenue elevation has a sunken lightwell in front and a vehicular access and ramp to the basement.
- 1.3 The building has a pitched roof on the Bloomsbury Street and Bedford Avenue elevations, with gables and dormers at the lower level serving the fifth floor. Behind the pitched roofs along Bloomsbury Street and Bedford Avenue is a flat roof with plant enclosures which, in some cases exceed the height of the pitched roofs.
- 1.4 There are several listed buildings at neighbouring sites. Immediately to the north nos. 40-54 Bedford Square are listed at Grade I. The significance of these buildings is primarily to the front which faces on to Bedford Square, itself a Grade II\* listed park and garden. To the east of the site, 24-60 Bloomsbury Street comprises a listed terrace (Grade II) of 19 houses dating from 1766. Further to the east is the British Museum (Grade I). Additionally, to the south of the site is Grade II\* listed 99 Great Russell Street and Grade II listed 98 and 100-109 Great Russell Street.
- 1.5 21 Bloomsbury Street forms part of the terrace of similar Victorian red brick 6/7 storey mansion buildings on Bedford Avenue. The buildings in the terrace are not listed but they are 'positive contributors' in the Bloomsbury Conservation Area Appraisal. Immediately to the west of 21 Bloomsbury Street are Bedford Court Mansions which comprise 114 flats in two building blocks, one facing Bedford Avenue and one sited to the rear.
- 1.6 The building immediately to the south is a hotel (The Kenilworth Hotel) and to the west of this, the listed buildings on Great Russell Street are in use for student housing.
- 1.7 The site is designated within the Central London Area. The site is also in the Bloomsbury Conservation Area and the London Suburbs Archaeological Priority Area (Tier 2).

## **2 THE PROPOSAL**

## 2.1 The proposed works consist of the following:

- Upgrade of secondary pedestrian entrance on Bloomsbury Street, minor alterations to main entrance on Bloomsbury Street, upgrade of entrance to basement on Bedford Avenue, replacement of windows on Bloomsbury Street elevation.
- Internal alterations to increase basement cycle storage, refuse storage, men's and women's showers/changing rooms, café and gym (Note: Works not affecting the external appearance do not require planning permission)
- Alterations to two storey rear extension and creation of 3rd, 4th and 5th floor rear extensions with adjoining terraces.
- Formation of a new level of dormer windows within existing mansard roof on Bedford Avenue, new louvres (2) within roof on Bloomsbury Street and replacement of faux chimneys on Bloomsbury Street and Bedford Avenue elevations. Erection of new seventh floor level offices on existing roof, re-siting of existing rooftop plant, formation of green roof/terrace areas and provision of balustrade and PV panels on roof plus creation of new lift over-run on roof.
- At sixth floor level there is currently a flat roof with projecting, glazed roof atrium, a plant enclosure to the north and a lift over-run to the south. All of these sit behind the pitched roofs on the Bloomsbury Street and Bedford Avenue elevations. They actually project above the pitched roofs on both elevations but they are not visible from street level because they are set back from the edges of the building. The new 6<sup>th</sup> floor extension would provide an additional floor of offices, with a terrace to the rear. It would have an amenity 'pavilion' and lift over-run atop in the centre. The existing roof-top plant would be relocated to a new 6<sup>th</sup> floor enclosure behind the pitched roof onto Bloomsbury Street and the lift over-run/core would be extended up to seventh floor level. The new 6<sup>th</sup> floor offices would be served by a row of dormer windows in the mansard roof on Bedford Avenue. The new louvres in the Bloomsbury Street pitched roof are for air intake/exhaust. The roof of the new 6<sup>th</sup> floor extension (i.e. seventh floor) would have a part green roof and terrace areas.

## 3 RELEVANT HISTORY

### Application Site

- 3.1 2022/0189/P – Certificate of Lawfulness - Partial infill of the existing atrium to create additional office floorspace – granted 29/03/2022. The certificate confirmed that the works as they would not material effect the external appearance of the building did not constitute development and did not require planning permission.

- 3.2 Five consents for air conditioning units on roof: - 2016/2187/P (03/05/2016), 2014/4034/P (04/07/2014), 2014/1593/P (10/03/2014), 2013/6116/P (03/10/2013), 2010/0852/P (09/03/2010).
- 3.3 2014/2288/P - Erection of a single storey rear extension at second floor level and use of existing roof top space as terrace – granted – 12/06/2014.
- 3.4 8703577 - Variations to planning permission for the redevelopment for office use (behind the retained facades to Bloomsbury Street and Bedford Avenue) granted by the Secretary of State for the Environment on 23rd January 1987 comprising alterations to elevations relocation of goods and fireman's lift lowering of lift shaft and raising of atrium roof – granted 17/09/1987 (implemented 1990).

#### 4 CONSULTATION SUMMARY

- 4.1 Multiple site notices were displayed in the vicinity of the site on 28/10/2022 (expiry 21/11/2022) and a press advert was published on 03/11/2022 (expiry 27/11/2022).

##### Local Groups

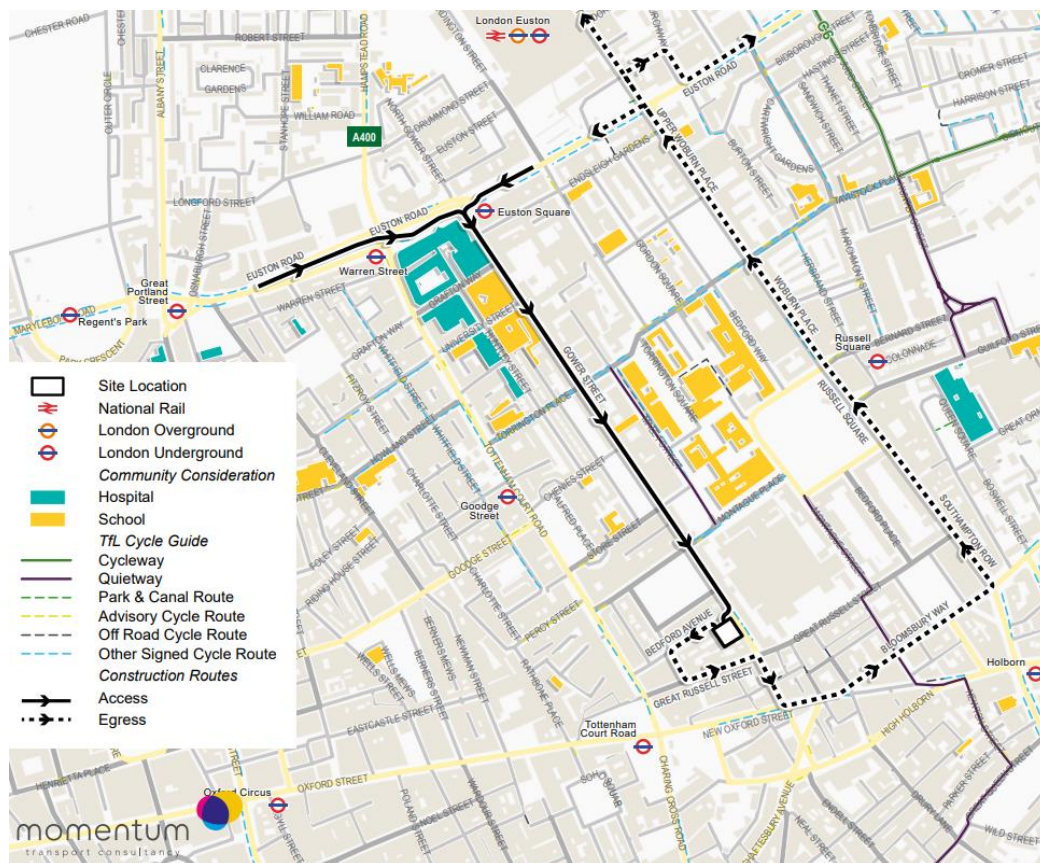
- 4.2 Two letters received from the **Bloomsbury Association**. Objections raised relate to:
- 4.3 Lack of housing as per Policy H2. This requires proposals which include 200 sqm or more of new commercial floorspace in the Central London Area to include 50% residential floorspace. There is a hierarchy for the provision of any such residential floorspace with the priority being for the provision 'on-site'. If this is not possible then the housing should be provided on an alternative site in the area. If this is not possible then the housing should be provided by way of an appropriate 'payment-in-lieu' to fund the provision of housing by the Council.

**Officer response:** See 'Land Use Policies: Policy H2 below'. The applicant has demonstrated, by way of a feasibility study, that, for reasons relating to the design & heritage of the building, the Building Regulations, the amenity of future occupiers and the functional use of the offices, it would not be possible for the requisite housing to be provided 'on-site'. A financial viability appraisal has been submitted which demonstrates that the proposed development would not be able to fund the provision of housing on site. Furthermore, the applicant does not have any other sites in the area where the housing could be provided. The applicant has agreed to the provision of the requisite housing (359.5 sqm) by way of a payment-in-lieu (£539,250) in accordance with the Council's Housing CPG. The requirement for the provision of commensurate housing under policy H2 would therefore be met.

- 4.4 Need for a Demolition and Construction Management Plan to be submitted and agreed prior to planning permission being granted. Bedford Avenue is already being used as the access route for a number of permitted schemes in the area, including at 247 Tottenham Court Road. Impacts of demolition/construction works need to be considered prior to planning permission being granted in the

interests of health and welfare of residents, the well-being of businesses, the safety of school children and the safeguarding of heritage assets, including a whole street of Grade I listed buildings, along with all the complexities of road and cycleway safety.

- 4.5 **Officer response:** See 'Transport' below. The Transport Planning Team note the need for a Construction Management Plan to ensure the safety and accessibility of the highway. Amenity issues during the course of construction would also be addressed in a Construction Management Plan. However, this can only be prepared when the Contractor is appointed and for this reason, it would be required to be submitted, agreed and implemented under a S.106 agreement further to planning permission being granted and prior to the relevant works being commenced. As such, the highway and amenity implications of the demolition and construction works would be appropriately controlled. The Draft Construction Management Plan includes indicative access and egress routes for construction vehicles (see below). The final Construction Management Plan will be considered by the Council's Transport Planning Team, the applicant would be required to consult with residents including the Bloomsbury Association when preparing the document.



- 4.6 Scaffolding has already been erected on the Bedford Avenue elevation and on Bedford Avenue itself.
- 4.7 **Officer response:** The applicant has confirmed that the scaffolding which has been erected is to enable 'stripping-out' works which do not require planning



*permission. Furthermore, the Highways Team have confirmed that a licence has been granted for the erection of the scaffolding.*

- 4.8 Harm to historic appearance of building and Conservation Area, with particular regard to setting/appearance of corner bays and proposed 'flat glass' windows.
- 4.9 **Officer response:** *See 'Design & Conservation' below. 21 Bloomsbury Street is not listed and therefore although the reinstatement of the historically authentic curved glazing would indeed go some way towards the reinstatement of the architectural grandeur of the building and its contribution to the setting of the listed buildings opposite and the character and appearance of the Conservation Area, the original windows have been lost and the Council cannot insist upon their reinstatement. Like-for-like replacement windows are proposed and these would not have any impact upon the existing character and appearance of the Conservation Area.*
- 4.10 *Other changes that are proposed – such as changes to the entrances to the building – are aimed at mitigating the architectural harm that resulted from the works associated with the 1980s scheme.*
- 4.11 Harm to the amenity of occupiers of Bedford Court Mansions dwellings by way of overshadowing, loss of privacy and noise.
- 4.12 **Officer response:** *See 'Impact on Neighbouring Amenity' below. A Sunlight & Daylight Assessment has been submitted and this demonstrates that, due to the siting and dimensions of the proposed 6<sup>th</sup> floor/roof-top extension, there would be no undue loss of sunlight or daylight to the Bedford Court Mansions. Conditions to prevent the use of the paved strip on the existing roof next to Bedford Court Mansions from being used as a terrace, and the provision and retention of an opaque screen to the new roof terrace would prevent overlooking of the Bedford Court Mansions flats. A condition to prevent the playing of music and use of the external terraces before or after typical office hours would prevent undue noise and disturbance for the occupiers of the Bedford Court Mansions flats.*
- 4.13 Request for crossover on Bedford Avenue to be removed
- 4.14 **Officer response:** *The crossover is needed to serve the entrance/exit to the basement which houses cycle parking facilities (162 proposed spaces). It is needed to provide access for cyclists. It does not impair the safety of the highway or harm the character or appearance of the Conservation Area.*
- 4.15 Request for bronze entrances on Bloomsbury Street to be replaced with black painted metal entrances.
- 4.16 **Officer response:** *Black painted metal entrances are not considered to be a significant feature of the streetscene on this side of Bloomsbury Street and the use of bronze is sympathetic with the red brick and not harmful to the character and appearance of the building or the Conservation Area.*

4.17 Request for gate to match Bedford Court Mansions gate for proposed entrance to basement (Bedford Avenue)

4.18 **Officer response:** *The proposed metal gate to the entrance to the basement on Bedford Avenue is historic in character and appearance and appropriate to the architectural and historic character of the building and Bedford Court Mansions.*

4.19 Adjoining Occupiers

4.20 A letter was received from Bedford Court Mansions Limited, the management company of Bedford Court Mansions (114 dwellings). One individual letter was also received from an owner/occupier in Bedford Court Mansions. Concerns arising from these objections relate to :

- Noise, disturbance and nuisance during construction (coupled with noise, disturbance and nuisance from development at 247 Tottenham Court Road).
- Impact on highway from construction vehicles; structural damage and obstruction. Loss of highway safety.
- Need for replacement resident vehicle parking spaces during construction.

**Officer's response:**

Noise, disturbance and nuisance during construction (coupled with noise, disturbance and nuisance from development at 247 Tottenham Court Road)

*Impacts on environmental health and safety during the course of construction are not matters upon which planning applications can be decided. However, the proper management and mitigation of these matters can be the subject of a Construction Management Plan which is recommended to be secured by way of a legal agreement. The Construction Management Plan would be required to be agreed prior to the commencement of any works associated with the development such that the amenity and security of neighbouring properties and the surrounding area are not prejudiced.*

Impact on highway from construction vehicles; structural damage and obstruction. Loss of highway safety

*The Transport Planning Team has considered the proposals and set out the Council's requirements in terms of car free development, cycle parking, servicing, Construction Management Plan, Travel Plan and cycling and pedestrian improvements. The assessment is included within the Transport section of this report below.*

*The Transport Planning Team note that the works will primarily take place within the site and there should therefore be no undue damage caused to the highway and a highways maintenance contribution should not be necessary. The Construction Management Plan would include measures to ensure the safety and accessibility of the highway.*

## 5 POLICIES & GUIDANCE

5.1 National Planning Policy Framework 2021

5.2 National First Homes Policy (Written Ministerial Statement May 2021)

5.3 Planning Statement on the Intermediate Housing Strategy and First Homes (March 2022)

5.4 The London Plan March 2021

5.5 Camden Local Plan 2017

- G1 Delivery and location of growth
- H2 Maximising the supply of self-contained housing from mixed use schemes
- C6 Access for all
- E1 Economic development
- A1 Managing the impact of development
- A4 Noise and vibration
- D1 Design
- D2 Heritage
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- T1 Prioritising walking, cycling and car-free development
- T2 Parking and car-free development

5.6 Camden Planning Guidance

- Access for All - March 2019
- Amenity - January 2021
- Design - January 2021
- Energy efficiency and adaptation - January 2021
- Planning for health and wellbeing - January 2021
- Transport - January 2021

5.7 Bloomsbury Conservation Area Appraisal and Management Strategy 2011

### ASSESSMENT

5.8 The principal considerations material to the determination of this application are considered in the following sections of this report:

6	Land Use Principles
7	Maximising the supply of self-contained housing from mixed-use schemes
8	Design and Conservation

9	Impact on Neighbouring Amenity
10	Transport
11	Landscaping and Biodiversity
12	Planning Obligations
13	Conclusions
14	Recommendations
15	Legal comments
16	Conditions and Informatives

## 6 LAND USE PRINCIPLES

- 6.1 The site lies in the Central London Area and the proposals would be acceptable in principle because they would involve alterations and extensions to an existing office building for office purposes. The development would be acceptable in principle under policy E1 (Economic Development).

## 7 MAXIMISING THE SUPPLY OF SELF-CONTAINED HOUSING FROM MIXED-USE SCHEMES

- 7.1 Under policy H2 of the Local Plan proposals in the Central London Area involving 200 sqm or more of new commercial floorspace (GIA) are required to include 50% of the new floorspace as housing.
- 7.2 In the first instance, the applicant should fully explored all options for delivery of the required housing on-site. If the applicant wishes to pursue off-site delivery, it must be demonstrated that the required housing could not be practically provided on-site.
- 7.3 If the applicant wishes to pursue a payment in lieu of the delivery of housing, it will be necessary to demonstrate that the required housing could not be practically provided at an alternative site in the area, for example because no suitable sites are available.
- 7.4 The proposals within this application would add 719 sqm GIA of additional floorspace and 359.5 sqm of residential floorspace should therefore be provided.
- 7.5 The applicant has demonstrated that due to the physical constraints of the site (existing office areas, location of core, entrances, orientation, limited access, steps/lightwell onto Bedford Avenue, distances to cores/entrances etc.) the provision of dwellings within the existing building (at all levels) would have complications in terms of residential and associated standards and regulations

and negative effects on the function of the office space. It is agreed that the provision of on-site housing to meet the policy H2 requirements would not be satisfactory in terms of residential standards/regulations and design implications on the building. Furthermore, following the submission of a financial viability appraisal, the Council's financial consultants, BPS, have indicated that the provision of on-site housing is also not viable. The deficit of the options with on-site housing residential (as indicated in the Design & Access Statement) vary from -£6.38M to -£13.71M. The value of the additional office floorspace however, with no on-site residential, is assessed at +£4.07M. The BPS Audit of the applicant's financial appraisal (January 2023) and Addendum V1 (February 2023) are appended to this report.

- 7.6 The applicant does not own any other sites in LB Camden which could be used to provide the requisite housing. The difficulty of finding additional sites to provide off site housing is also noted in the Housing CPG (para 5.28) "*in recent years opportunities to acquire potential delivery sites at relatively low costs have diminished, and it has no longer been possible for developments to meet initial off-site targets in full*". It has therefore been agreed that the provision of housing required under policy H2 can be met by way of a payment-in-lieu in this case. The applicant has agreed to pay £539,250 for the provision of 359.5 sqm of housing 'off-site'. The £539,250 payment-in-lieu has been checked by Officers and found to be in full accordance with the Council's Housing CPG.
- 7.7 The proposal therefore complies with policy H2.
- 7.8 First homes: The national First Homes policy has now come into effect for developments that trigger an affordable housing contribution. First Homes are a new type of discount housing for sale. National policy indicates that First Homes should form 25% of the affordable housing sought in a development, and that where a payment in lieu (PIL) is sought in place of affordable housing, 25% of the value should be used to deliver First Homes. However, the Council has adopted a Planning Statement on the Intermediate Housing Strategy and First Homes, which indicates that First Homes in Camden would not be affordable to median income residents, and consequently First Homes will not be sought in the borough. Having regard to the national and local policies relating to First Homes, any funds arising from PIL are expected to contribute to the Council's preferred affordable housing types identified by Local Plan Policy H4 and CPG Housing 2021, namely social affordable housing and intermediate rented housing.

## **8 DESIGN AND HERITAGE**

### Statutory Framework

- 8.1 The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality, which improves the function, appearance, and character of the area. 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 and listed buildings. Camden's Local Plan is supported by CPG (Design) and, in this case, the Bloomsbury conservation area appraisal and management strategy 2011.

- 8.2 In considering development that affects a conservation area, Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.
- 8.3 In considering development that affects the setting of a Listed building Section 66 of the of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires Local Planning Authorities to pay special attention to the desirability of preserving the listed building, its setting and its features of special architectural or historic interest.
- 8.4 Considering each element of the proposals in turn:

Creation of sixth storey/rooftop office extension and new roof-top plant enclosure

- 8.5 The existing sixth storey/roof-top level includes the atrium 'over-run' enclosure, a lift over-run and plant enclosure. They represent a conglomerate of unsightly steel/clad structures when viewed from the neighbouring dwellings in Bedford Court Mansions and adjoining sites. They are not of architectural or historic merit on the building or in the Conservation Area. The proposed metal clad/brick/glazed office extension, with glazed acoustic barrier and tiled terraces with metal balustrades and re-located mesh plant enclosure would improve the visual amenity of the site from neighbouring properties and preserve the appearance of the site and the Conservation Area in the public domain.

Erection of new dormer windows on Bedford Avenue

- 8.6 The introduction of a second tier of dormers for No.21 as proposed for the Bedford Avenue elevation is not opposed as Bedford Court Mansions demonstrates examples of double dormer design to the western end of the Bedford Avenue elevation. The proposed dormer windows on the sixth floor of Bedford Avenue replicate the language and proportions of the 5th floors and those of the adjacent mansion block.
- 8.7 The applicant has demonstrated, in the Candidate Viewpoint Study in the Design & Access Statement, that the new sixth storey/roof-top office extension, new roof-top plant enclosure and alterations to the Bedford Avenue (and Bloomsbury Street) roofs would not harm the appearance of the building, the terrace within which it sits or the wider Conservation Area or listed buildings. The roof-top extension/roof-top plant enclosure would not be excessive or intrusive upon the form, architectural character or heritage of the building. The new row of dormer windows on the Bedford Avenue elevation would be sympathetic and in keeping with the building and the Bedford Avenue terrace. There would be no harm to the character or appearance of the Conservation Area or the setting or appearance of any neighbouring listed buildings, from any public viewpoints.

- 8.8 No detailed drawings of the dormer windows have been provided and so a condition is recommended to ensure that the construction, materials and appearance of the dormer windows preserves the character and appearance of the Conservation Area.

Replacement of existing faux chimneys on Bloomsbury Street elevation

- 8.9 The replacement of the faux chimney stacks with the genuine brick stacks is also supported in conservation and design terms.

Upgrades to entrances on Bloomsbury Street and Bedford Avenue

- 8.10 The style and proportions of the entrances would be sensitive to the architectural language of the original building with timber used for the frames. The original glazing proportions and ornate traditional metalwork, which is evident within the railings and entrance gates with the added level of decorative masonry façades of the mansion blocks, have been referenced. Stone paving is to be provided/cleaned. A traditional metal gate with bronze header and timber doors is to be provided on Bedford Avenue.

Replacement windows

- 8.11 The existing windows to 21 Bloomsbury Street date to the 1990's redevelopment and are metal windows designed to mimic the original sashes and casements. There is an opportunity in these redevelopment works to replace these windows with new double glazed timber and steel framed replacements to match with the original fenestration evident in the neighbouring Bedford Court Mansions. These proposed works will be an enhancement to the buildings setting in the Conservation Area, thermal performance and longevity. On the Bedford Avenue elevation the existing metal casement, timber casement and timber sash windows will be replaced on a like-for-like basis, in keeping with the neighbouring Bedford Court Mansions which demonstrates the original design and hierarchy of timber sashes, timber casements and steel casements.

2nd, 3rd, 4th, 5th floor rear extension

- 8.12 The existing south elevation includes a central glazed curtain wall elevation. This extensive glazing does not suit the character of the rest of the building. The proposal removes the central glazed curtain walling and introduces a similar form and rhythm of the punched windows within a brickwork elevation. In combination with the terraced extrusion to the south this presents the opportunity for the introduction of landscaping and urban greening to 'soften' the appearance and add an interesting feature to this backland setting.
- 8.13 Overall, the proposed roof-top and rear extensions and elevational alterations would be in keeping with the architectural character and heritage of the building and the surrounding heritage assets (Listed buildings and Conservation Area). The proposals would preserve the Conservation Area and setting of the listed buildings and they would therefore comply with the Council's, London Plan and NPPF policies for the historic environment.

## **9 IMPACT ON NEIGHBOURING AMENITY**

- 9.1 The Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. It seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for development that would not harm the amenity of neighbouring residents. This includes privacy, overlooking, outlook and implications on daylight and sunlight.
- 9.2 Two extensions are essentially proposed.
- 9.3 The extension on the 6th floor would be sited alongside residential properties in Bedford Court Mansions. There are front and rear flats in Bedford Court Mansions with windows alongside the existing 6th floor level flat roof at the site. The bulk of the 3m high extension would be 5.7m from the main elevations of the flat at the front of Bedford Court Mansions with the nearer part being 2m from the window in the side elevation of the front flat. The extension would be 5m from the flat at the rear of Bedford Court Mansions.
- 9.4 The main rear windows of these flats do not directly face the site. There is a secondary window in the side elevation of the flat at the front that faces the site. While the rear flat has a window facing the site, this flat is primarily served by south facing windows which do not face the site. Consequently, the proposed 3m high roof-top extension, which would be set back from the Bedford Court Mansions boundary, would not result in a significant loss of outlook or significant over-bearing or over-enclosing effects for the occupiers of the front or rear flats in Bedford Court Mansions.
- 9.5 The treatments of the external areas of the proposed sixth floor and the roof of the extension are indicated on the landscape plans in the Design & Access Statement. Part of the existing roof and part of the roof of the proposed sixth floor extension are proposed for use as terraces. The terraces would be set back from Bedford Court Mansions and screens/planters are indicated between the extension/terraces and Bedford Court Mansions. As such the sixth floor extension and its associated terraces would not result in direct overlooking of the Bedford Court Mansions flats. However, a condition is to be attached to secure details of the screens to ensure privacy for the occupiers of the neighbouring dwellings as these are not shown. The approved details will be required to be retained permanently thereafter.
- 9.6 The proposed 2nd, 3rd, 4th and 5<sup>th</sup>, 6<sup>th</sup> floor and roof-top (7<sup>th</sup> floor) terraces would be unlikely to result in undue noise or disturbance during office hours. However, as there are residential uses on neighbouring sites, a condition is recommended to restrict the use of the terraces to Mondays to Fridays from 08:00 a.m. to 06:00 p.m. to protect neighbouring residents from undue noise and disturbance outside of normal working hours.
- 9.7 The applicant has requested that the terraces on the main building (6<sup>th</sup> floor/roof) be used 12 times a year until 9 p.m. It is considered that a Management Plan



should be submitted and approved (under the S.106 agreement) to ensure that the use of the terraces until 9 p.m. 12 times a year does not cause undue noise or disturbance for the occupiers of neighbouring properties.

- 9.8 At the rear, the extensions and enlarged terraces which are proposed to the existing rear wing (at 2<sup>nd</sup>, 3rd, 4th and 5th floor level) would be sited so as not result in any loss of light or outlook for any neighbouring occupiers. These proposals would be opposite the service wall of the Kenilworth Hotel to the south and the windows of the residential properties of the student housing at 98+ Great Russell Street are at such a distance (i.e. 12.5m +) and orientation that they should not be affected in terms of light, privacy or outlook.
- 9.9 Balustrades and planting are shown to the boundaries of the 2<sup>nd</sup>, 3rd, 4th and 5th floor level rear terraces and the appearance of the extensions and terraces would not be harmful to the outlook or light of the properties to the south. It is recommended that details of the boundary treatments of the 2<sup>nd</sup>, 3rd, 4th and 5th floor level rear terraces are submitted for approval under a planning condition to mitigate against any potential overlooking of any neighbouring habitable rooms or terraces.
- 9.10 Green roofed areas are also proposed on part of the existing roof and part of the proposed roof. Particularly, a green roof is shown on the existing roof immediately adjacent to Bedford Court Mansions and also on the roof of the new seventh storey extension. Whilst these green roofed areas are not intended for use as amenity spaces they would result in potential overlooking and intrusiveness to the Bedford Court Mansions flats if ever they did fall into such use and so a condition will be attached to prevent these green roofed areas from being used as terraces.
- 9.11 The application is accompanied by a Sunlight & Daylight Assessment. With respect to the adjoining flats in Bedford Court Mansions it is found that 'The results of all three tests for daylight and sunlight show full and comfortable compliance with the BRE Guidelines. No window will experience a percentage reduction of Vertical Skylight Component or internal Daylight Distribution in excess of 20% and it therefore follows that as the change is within 20% of current values, any change in natural lighting conditions will not be materially noticeable. All of the dwellings within Bedford Court Mansions will therefore continue to receive adequate levels of natural daylight'. Furthermore, the results show full compliance with the BRE Guidelines for both Annual and Winter Sunlight Annual Probable Sunlight Hours with very little change of sunlight availability at all.
- 9.12 An acoustic assessment has been submitted for the new roof-top plant. The Assessment has been undertaken in relation to multiple residential properties within the vicinity of the application site:
- Top floor residential dwellings (north west) at 40-73 Bedford Avenue, London WC1B 3AA
  - Top floor residential dwellings (west) at 40-73 Bedford Avenue, London WC1B 3AA, and

- Radisson Blu Edwardian Kenilworth Hotel at 97 Great Russell Street, London WC1B 3LB.

- 9.13 Appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, National Planning Policy Framework (NPPF), Planning Practice Guidance on Noise, Camden Council's Local Plan, version June 2017 and BS 4142:2014.
- 9.14 The submitted plant noise impact assessment has found that the noise guidelines are met at all assessment locations during all periods of operation assuming they are installed with the specified noise mitigation. Therefore the proposed mechanical plant should have no adverse impact on the nearest sensitive receivers. Conditions are recommended to be attached to ensure that the plant noise levels remain below ambient noise levels and that anti-vibration measures are put in place and permanently retained.
- 9.15 A Draft Construction Management Plan has been submitted to outline measures to mitigate any excessive noise or disturbance from construction to neighbouring occupiers. A final Construction Management Plan cannot be signed off until planning permission is granted. However, under the S.106 agreement which will be required to be completed (see 'Planning Obligations' below) the Construction Management Plan will have to be submitted and agreed prior to commencement of the development, and implemented thereafter.
- 9.16 For the reasons outlined above, the proposed development is considered to have an acceptable impact on neighbouring amenity and complies with Policy A1.

## 10 **TRANSPORT**

### General

- 10.1 The site has a PTAL score of 6b which indicates that it has an excellent level of accessibility by public transport. The nearest stations are Tottenham Court Road, located to the south west, Holborn, located to the east, and Goodge Street, located to the north west. The nearest bus stops are located on Tottenham Court Road, New Oxford Street and Gower Street.

### Cycle Parking

- 10.2 In line with Policy T1 of the adopted Camden Local Plan, we expect cycle parking at developments to be provided in accordance with the standards set out in the London Plan. However, as this is an extension to an existing building we can in reality only demand London Plan compliant cycle parking levels for the extension. Nevertheless, the applicant is proposing to provide cycle parking within the basement area to serve the entire building. A total of 162 cycle parking spaces are proposed, comprising 100 two tier spaces, 24 wall mounted vertical spaces, 18 Brompton lockers, 12 Sheffield stands and 8 adapted cycle spaces. It is recommended that the vertical and Brompton spaces be replaced with two tier or Sheffield stands as these are more appropriate, offer higher levels of

security and are easier to use. The number of adapted spaces could also be reduced to free up space for more conventional cycle parking. Overall, this level of cycle parking is considered appropriate. However, a planning condition is to be attached to secure details of all of the 162 cycle parking spaces as two tier or Sheffield stands. The cycle store will be accessed via the basement ramp from Bedford Avenue. Showers, lockers and changing rooms will be provided in close proximity to the cycle store. The applicant also proposes that 12 spaces (6 Sheffield or M-shaped) stands be placed on the footway in the vicinity of the site. Therefore a Cycle Parking Contribution of (6 x £255=) £1,530 should be secured by means of the Section 106 Agreement.

#### Car parking

- 10.3 In accordance with Policy T2 of the adopted Camden Local Plan, we expect all developments to be car free. The remaining basement car parking spaces at the site are to be removed in order to accommodate the cycle parking facilities. The development should be secured as on-street Business parking permit free by means of the Section 106 Agreement. This will ensure that the future occupiers do not add to existing on-street parking stress, traffic congestion and air pollution, whilst encouraging the use of more sustainable modes of transport such as walking, cycling and public transport.

#### Travel Plan

- 10.4 A Travel Plan and associated Monitoring and Measures Contribution of £5,196 should be secured by means of the Section 106 Agreement. This will also assist in encouraging the use of sustainable travel modes to and from the site.

#### Deliveries and servicing

- 10.5 The Design and Access Statement states that the intention is for the majority of deliveries to be undertaken by cargo bike from the basement area. Whilst this is feasible, it is questionable whether it is workable in practice given that most deliveries take place from small to medium sized vans. It is therefore recommended that a Servicing Management Plan be secured by means of the Section 106 Agreement to ensure that deliveries to the site are properly managed in a sustainable and realistic manner. Some deliveries can take place from the Resident parking bays outside the site on Bedford Avenue. No deliveries can take place from Bloomsbury Street due to the restrictions referred to below. Refuse will be stored in a room at the bottom of the ramp to the basement and will be taken up for collection on the relevant day(s).

#### Construction Management Plan

- 10.6 Bloomsbury Street has raised cycle lanes on both side and double yellow lines and double kerb blips which prevent loading from occurring at any time. This means that the only location from which construction vehicles can load is from the resident permit bays on Bedford Avenue. It is assumed that a number of these permit bays will need to be suspended to enable construction activity to occur throughout the construction process. Given the extent of refurbishment

and extension works, it is considered that this application should be subject to a Construction Management Plan and associated Implementation Support Contribution of £4,075.60 and Impact Bond of £7,874.00 to be secured by means of the Section 106 Agreement. This will help ensure that the proposed development is carried out without undue impact on the operation of the local highway network or neighbouring amenity. The Construction Management Plan cannot be finalised until a resolution to grant planning permission is made and a Contractor can be appointed. The final Construction Management Plan will be considered by the Council's Transport Planning Team. It will need to be prepared in consultation with residents including the Bloomsbury Association.

#### Pedestrian, Cycling and Environmental improvements

- 10.7 Given the uplift in footfall and activity at the site it is considered appropriate that a Pedestrian, Cycling and Environmental improvements contribution of £30,000 should be secured by means of the Section 106 Agreement. This will be used towards the implementation of suitable measures to encourage walking and cycling in the area surrounding the site.

#### Highway maintenance/reinstatement

- 10.8 Given that the scaffolding for the proposed improvements and extensions to the site will be placed within the site boundary, it is considered that the proposed development is unlikely to lead to damage to the adjacent footway. A Section 106 contribution towards highways works is therefore considered unnecessary in this instance. The existing vehicle crossover on Bedford Avenue will be retained to enable cycle access to the basement ramp and cycle storage facilities.

### **11 SUSTAINABILITY**

- 11.1 All new development should comply with the Local Plan policies for sustainability and climate change.
- 11.2 The Energy Efficiency and Adaptation CPG requires new non-residential developments of from 500 sq m to 1,000 sq m to achieve the greatest possible reduction below Part L of 2013 Building Regulations (Local Plan CC1) and a 20% reduction on CO<sub>2</sub> emissions from renewable energy technologies.
- 11.3 The proposals are projected to achieve an overall carbon reduction of 38% on-site using up to date SAP10.2 carbon calculations against Part L 2021 baseline.
- 11.4 The development achieves a very high improvement on the Be Lean (building fabric) criteria (i.e. 36%) but not as much on the Be Green (renewable energy technologies) criteria (i.e. 2.5%). This is due to the project being a refurbishment so any improvements to the fabric provide a significant advantage. It is acknowledged that 2.5% on Be Green is relatively low and could potentially be improved by installing PV panels on the roof. However, the available space at roof level is considered too limited for this to make a significant difference to the Be Green result. In order to maximise the space for PVs this would require a

reduction in green roof area, which carries its own sustainability and biodiversity benefits.

- 11.5 Active cooling is proposed to replace existing units. The cooling hierarchy has been adequately addressed to justify the need for mechanical ventilation and measures to reduce cooling energy demand incorporated.
- 11.6 The BREEAM overall base case score is 77.14% which would meet the requirement for BREEAM Excellent.
- 11.7 The proposal for a green roof would be in accordance with the Council's policies for sustainability in terms of drainage and biodiversity. A condition is recommended to be attached to secure details of its specification and maintenance to ensure its long term natural drainage and biodiversity credentials.
- 11.8 It is considered that due to the positive overall CO2 reduction (in excess of the 35% GLA target), and the fact that this is a refurbishment, which delivers savings of embodied carbon, that the proposal satisfactorily complies with the Council's climate change policies and the Energy Efficiency & Adaptation CPG.
- 11.9 To ensure that the completed development meets the carbon reduction targets and a BREEAM Excellent rating, a Sustainability & Energy Plan to demonstrate compliance should be secured under the S.106 legal agreement.

## 12 PLANNING OBLIGATIONS

- 12.1 The following obligations are required to mitigate the impact of the development upon the local area, including on local services. These heads of terms will mitigate any impact of the proposal on the infrastructure of the area.

Obligation	Amount (£)
Provision of off-site housing	£539,250
Car free development (Prevention from obtaining business parking permits)	N/A
Construction Management Plan and associated Implementation Support Contribution	£4,075.60
Construction Impact Bond	£7,874.00
Cycle parking contribution	£1,530
Travel Plan and associated Monitoring and Measures contribution	£5,196
Pedestrian, Cycling and Environmental improvements contribution	£30,000
Servicing Management Plan	N/A
Sustainability & Energy Plan	N/A
External terrace(s) Management Plan	N/A

## 13 CONCLUSION

13.1 The proposed extensions and alterations to the existing office building are acceptable in land use terms. Proposals for office extensions and alterations are acceptable in principle in the Central London Area. The requirement for the provision of a commensurate level of housing under policy H2 would be met by an appropriate payment-in-lieu as it has been demonstrated that the housing cannot practically or viably be provided on site and the applicant has not alternative sites where the requisite housing could be provided. The proposals would not harm the character or appearance of the building in the Conservation Area and there would be no harm to the setting of any neighbouring listed buildings. There would be no harm to the amenity of any neighbouring residents and subject to a legal agreement including car free terms, Construction Management Plan, Travel Plan, pedestrian/cycling improvements and the provision of off-site cycle facilities, the proposals would comply with the Council's policies for transport infrastructure. The proposals would comply with the carbon reduction targets for non-residential developments between 500 sqm and 1,000 sqm in the Energy & Efficiency CPG.

13.2 The development is considered to comply with policies of the development plan as a whole, subject to conditions and the applicant entering into a S106 legal agreement.

#### **14 RECOMMENDATIONS**

14.1 Planning Permission is recommended subject to conditions and a Section 106 Legal Agreement covering the following Heads of Terms:-

- Contribution of £539,250 towards the provision of housing 'off-site'
- Provision of 12 'off-site' cycle parking spaces (6 Sheffield or M-shaped) on the footway in the vicinity of the site by way of a financial contribution of £1,530
- A Travel Plan and associated Monitoring and Measures Contribution of £5,196
- Car-free development by way of prevention from obtaining on-street business parking permits
- Servicing Management Plan
- Construction Management Plan and associated Implementation Support Contribution of £4,075.60 and Impact Bond of £7,874.00
- Pedestrian, Cycling and Environmental improvements contribution of £30,000
- Sustainability & Energy Plan
- External Terrace(s) Management Plan

#### **15 LEGAL COMMENTS**

15.1 Members are referred to the note from the Legal Division at the start of the Agenda.

#### **16 Conditions**

1	<p>Three years from the date of this permission</p> <p>This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p>The development hereby permitted shall be carried out in accordance with the following approved drawings &amp; documents:</p> <p>Existing:</p> <p>4677 ST EX: 01 001 (Site Location Plan), 01 002 1 (Site Plan)</p> <p>4677 ST XX :</p> <p>00 PL A 02-100EXPL (Existing ground floor plan), 01 PL A 02-101EXPL (Existing first floor plan), 02 PL A 02-102EXPL (Existing second floor plan), 03 PL A 02-103EXPL (Existing third floor plan), 04 PL A 02-104EXPL (Existing fourth floor plan), 05 PL A 02-105EXPL (Existing fifth floor plan), 06 PL A 02-106EXPL (Existing sixth floor plan), 07 PL A 02-107EXPL (Existing roof floor plan), LG PL A 02-099EXPL (Existing lower ground floor plan), XX PL A 03 100EXPL (Existing east elevation), XX PL A 03 101EXPL (Existing north elevation), XX PL A 03 102EXPL (Existing west elevation), XX PL A 03 103EXPL (Existing south elevation), XX PL A 04 100EXPL (Existing section AA)</p> <p>Proposed:</p> <p>4677 ST XX :</p> <p>00 PL A 02-100PL (Proposed ground floor plan), 01 PL A 02-101PL (Proposed first floor plan), 02 PL A 02-102PL (Proposed second floor plan), 03 PL A 02-103PL (Proposed third floor plan), 04 PL A 02-104PL (Proposed fourth floor plan), 05 PL A 02-105PL (Proposed fifth floor plan), 06 PL A 02-106PL (Proposed sixth floor plan), 07 PL A 02-107PL (Proposed seventh floor plan), 08 PL A 02-108PL (Proposed roof plan), LG PL A 02-09PL (Proposed lower ground floor plan), XX PL A 03 100PL (Proposed east elevation), XX PL A 03 101PL (Proposed north elevation), XX PL A 03 102PL (Proposed west elevation), XX PL A 03 103PL (Proposed south elevation), XX PL A 04 100PL (Proposed section AA)</p> <p>Documents:</p> <p>Covering Letter (Gerald Eve 06/10/2022); BREEAM Pre-Assessment (SWE CO - August 2022), Construction/Demolition Management Plan (LB Camden/Momentum Transport Consultancy - October 2022), Design and Access Statement (Stiff &amp; Trevillion - October 2022), Energy &amp; Sustainability Statement (SWE CO - October 2022), Daylight &amp; Sunlight Report (Lumina - July 2022), Framework Delivery &amp; Servicing Plan (Momentum Transport Consultancy</p>

	<p>- October 2022), Framework Travel Plan (Momentum Transport Consultancy - October 2022), Statement of Community Involvement (Kanda - August 2022), Townscape, Heritage and Visual Assessment (KM Heritage - July 2022), Planning Statement (Gerald Eve - October 2022), Transport Statement (Momentum Transport Consultancy - October 2022), Planning Report for Acoustics (SWECO - August 2022)</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
4	<p>Before the relevant part of the work is begun, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:</p> <p>a) Details including sections at 1:10 of all windows (including jambs, head and cill), external doors, gates, railings and rainwater goods</p> <p>b) Manufacturer's specification details of facing bricks</p> <p>The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
6	<p>The external noise level emitted from plant, machinery or equipment at the development with any specified noise mitigation hereby approved shall be lower than the typical existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 'Methods for rating and assessing industrial and commercial sound' at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity and thereafter be permanently retained.</p> <p>Reason: To ensure that the amenity of occupiers of the development site/surrounding premises is not adversely affected by noise from mechanical installations/equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>



7	<p>Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.</p> <p>Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017</p>
8	<p>Unless as stipulated in the External Terrace(s) Management Plan (secured by the associated S106 legal agreement), the 2<sup>nd</sup> floor, 3<sup>rd</sup> floor, 4<sup>th</sup> floor, 5<sup>th</sup> floor, 6<sup>th</sup> floor, 7<sup>th</sup> floor/roof terraces shown on drawings 4677-ST-XX-02-PL-A-02: 102 PL, 103 PL, 104 PL, 105 PL, 106 PL, 107 PL, 108 PL hereby approved shall not be used outside of the hours of 08:00 a.m. to 06:00 p.m. on Mondays to Fridays.</p> <p>Reason: To protect the amenity of the occupiers of neighbouring properties in accordance with policy A1 (Managing the impacts of development) of the Camden Local Plan 2017.</p>
9	<p>Prior to any use of the 2<sup>nd</sup> floor, 3<sup>rd</sup> floor, 4<sup>th</sup> floor, 5<sup>th</sup> floor, 6<sup>th</sup> floor, 7<sup>th</sup> floor/roof terraces shown on drawings 4677-ST-XX-02-PL-A-02: 102 PL, 103 PL, 104 PL, 105 PL, 106 PL, 107 PL, 108 PL, details of the boundary treatments shall be submitted to and approved in writing by the Local Planning Authority. The boundary treatments shall be permanently retained thereafter.</p> <p>Reason: To protect the amenity of the occupiers of neighbouring properties in accordance with policy A1 (Managing the impacts of development) of the Camden Local Plan 2017.</p>
10	<p>No music shall be played on the premises in such a way as to be audible within any neighbouring premises or on the adjoining highway.</p> <p>Reason: To safeguard the amenities of the occupiers of neighbouring premises and the area generally in accordance with the requirements of policies G1, CC1, D1, A1, A4, TC1, TC2 and TC4 of the London Borough of Camden Local Plan 2017.</p>
10	<p>Access to the green roofs shaded green on the proposed sixth floor plan (adjacent to Bedford Court Mansions) and landscape plan at level 07 (on the roof of the sixth floor extension) in the Design &amp; Access Statement shall be for maintenance purposes and emergency only.</p> <p>Reason: To protect the amenity of the occupiers of neighbouring properties in accordance with policy A1 (Managing the impacts of development) of the Camden Local Plan 2017.</p>
11	<p>Prior to commencement of development, full details in respect of the green roofs in the area indicated on the landscape plans in the Design &amp; Access Statement shall be submitted to and approved by the local planning authority. The details shall include :</p>

	<ul style="list-style-type: none"> <li>i. a detailed scheme of maintenance</li> <li>ii. sections at a scale of 1:20 with manufacturers details demonstrating the construction and materials used</li> <li>iii. full details of planting species and density</li> </ul> <p>The green roofs shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme.</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies G1, CC1, CC2, CC3, D1, D2 and A3 of the London Borough of Camden Local Plan 2017.</p>
12	<p>Prior to occupation of the development hereby permitted details of secure and covered cycle storage area for 162 cycles, which shall be two tier or Sheffield stands, shall be submitted to and approved by the local planning authority. The approved facility shall thereafter be provided in its entirety prior to the first occupation of any of the new units, and permanently retained thereafter.</p> <p>Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.</p>

## 17 Informatives – planning application

1	<p>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941</p>
2	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at <a href="http://www.camden.gov.uk">www.camden.gov.uk</a>) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444). Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>

3	<p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations &amp; Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
4	<p>Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ</p>

## APPENDIX ONE

Independent Viability Review - January 2023 & Addendum V1 - February 2023

BPS Chartered Surveyors