

**9 BEDFORD ROW,  
LONDON, WC1R 4BU**

**PLANNING STATEMENT**

**APPLICATION FOR FULL PLANNING PERMISSION AND LISTED BUILDING CONSENT**

**AUGUST 2023**



# CONTENTS

1.0 EXECUTIVE SUMMARY .....	3
2.0 INTRODUCTION AND BACKGROUND .....	4
3.0 APPLICATION SITE AND SURROUNDINGS .....	6
4.0 DEVELOPMENT PROPOSALS .....	10
5.0 PLANNING POLICY FRAMEWORK.....	12
6.0 PLANNING POLICY ASSESSMENT .....	15
7.0 CONCLUSIONS .....	28

# 1.0 EXECUTIVE SUMMARY

- 1.1 This Planning Statement forms part of the Applications for Planning Permission and Listed Building Consent (“the Application”) submitted by Genevray UK Limited (“the Applicant”) to the London Borough of Camden (“LBC”) for the conversion and refurbishment of no. 9 Bedford Row, London, WC1R 4BU (“the Site”), to provide a single family dwelling under Class C3 (also referred to the “main house” / “the Building”) and the refurbishment of no. 9 Jockey’s Field (“mews house”) situated to its rear (**Section 2**).
- 1.2 The Site is located within the London Borough of Camden, to the west of Gray’s Inn Gardens. The Building was in residential use until the mid-1800s and has been used exclusively as an office since circa 1858 and has been vacant since March 2022 (**Section 3**).
- 1.3 The subject Building forms part of a group listing relating to nos. 8-13 Bedford Row and is Grade II\* listed. The Site is also located within the Bloomsbury Conservation Area (**Section 3**).
- 1.4 The Proposals ensure that the Site is brought back into use, through the creation of a high-quality residential space featuring a reinstated historical plan form and through removing unsympathetic and removal of intrusive modern building fabric throughout. Returning the Building back into its original use through sensitive restoration would result in an enhancement to the significance of the listed building (**Section 6**).
- 1.5 Overall, the Proposed Development is in accordance with the national regional and local planning policy, including other material considerations such as emerging policy and guidance. The Proposals would provide a number of planning benefits over and above the existing situation (**Section 7**).

## 2.0 INTRODUCTION AND BACKGROUND

- 2.1 This Planning Statement forms part of the Application for Planning Permission and Listed Building Consent (“the Application”) submitted by Genevray UK Limited (“the Applicant”) to the London Borough of Camden (“LBC”) for the conversion and refurbishment of no. 9 Bedford Row London, WC1R 4BU (“the Site”), to provide a single family dwelling under Class C3 (also referred to the “main house” / “the Building”) and the refurbishment of no. 9 Jockey’s Field (“mews house”) situated to its rear .

### Planning Application

- 2.2 This Planning Statement (“the / this Statement”) has been prepared in relation to the Application for Planning Permission and Listed Building Consent for no. 9 Bedford Row.
- 2.3 Full details of the Proposed Development are set out in the Design and Access Statement that accompanies this Application, prepared by Quinn Architects.
- 2.4 The description of developments for the Application seeking full Planning Permission is as follows:

*“Change of use of 9 Bedford Row from office (Class E) to residential (Class C3) to form a self-contained dwelling and internal and external alterations to the building and to the non-original ‘mews house’ to the rear, including demolition of link structure, refurbishment, and reconfiguration to reinstate the historic floor plan and associated works.”*

- 2.5 The description of developments for the Application seeking Listed Building Consent is as follows:

*“Internal and external alterations to the building and to the non- original ‘mews house’ to the rear, including demolition of link structure, refurbishment of facades, removal of modern and non-original fabric and services, reconfiguration to reinstate the historic floor plan, and associated works.”*

### Purpose and Format of the Planning Statement

- 2.6 The purpose of this Planning Statement is to provide information to allow for an informed assessment of the Proposed Development against relevant national, regional, and local planning policy and other material considerations.
- 2.7 This Statement sets out how the relevant planning policies and other key material considerations to the determination of the Application have been taken into account. This Statement brings together the findings of the technical reports identified below and, having regard to these, provides a balanced planning assessment of the merits of the proposals.
- 2.8 The scope of supporting information has been established with regard to the national and local list requirements.
- 2.9 A Document Schedule has been prepared for the Application. Table 1.1 confirms the project team responsible for each matter:

DOC REF	NAME OF DOCUMENT	AUTHOR
(1)	Schedule of Submitted Application Documents	Montagu Evans
(2)	Covering Letter	Montagu Evans
(3)	Application Form: Full Planning and Listed Building Consent	Montagu Evans

(4)	Community Infrastructure Levy	Montagu Evans
(5)	Drawing Schedule	Quinn Architects
(6)	Site Location Plan	Quinn Architects
(7)	Application Drawings	Quinn Architects
(8)	Schedules (incl. fireplace, door, window)	Quinn Architects
(9)	Design and Access Statement	Quinn Architects
(10)	Planning Statement	Montagu Evans
(11)	Heritage Statement	John Lowe Heritage
(12)	Loss of Employment Report (with Marketing Report)	Montagu Evans & Gale Priggen & Co
(13)	Sustainability Statement / Energy Strategy	Jaw Sustainability
(14)	Structural Report	Structural Design Studio
(15)	Draft Construction / Demolition Management Plan	Paul Mew Associates
(16)	Photography Survey	Quinn Architects
(17)	Schedule of Works	Quinn Architects

2.10 This Planning Statement demonstrates that the overall Scheme would:

- Deliver sustainable development of a vacant, brownfield Site within Central London, in line with the overarching approach to development outlined in the NPPF;
- Ensure that the Site is brought back into its optimum use, through the creation of a high-quality residential dwelling which reinstates the historic plan form, removes unsympathetic and intrusive modern and non-original fabrics, and sensitive refurbishment of the existing features of special interest;
- Deliver a design of high-quality architecture that would be congruous to the surrounding context, including preserving and enhancing the character and appearance of the conservation area and setting of listed buildings within the vicinity;
- Result in an enhancement to the significance of the listed building by returning the building to its original use;
- Deliver a high quality design which promotes sustainability measures throughout its design, construction and lifetime of the Building; and
- Contribute to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development with cycle parking provision which would promote other means of travel such as cycling and walking.

2.11 **Section 3** of this Statement provides background information on the Site including its planning history. **Section 4** sets out the Proposals for the Site. **Section 5** summarises the planning policy relevant to the Site. The Application proposals are assessed against these policies in **Section 6**. A summary and conclusions are contained within **Section 7**.

# 3.0 APPLICATION SITE AND SURROUNDINGS

## Application Site

- 3.1 The Site is located within the administrative boundary of the London Borough of Camden ("LBC"), in the Bloomsbury area. It is situated within the southeast corner of the Borough, with the City of London just to the east and the City of Westminster to the south of the Site. The site area comprises approximately 968.2 square metres.
- 3.2 The Site forms part of the Grade II\* listed Georgian terrace running south-north. The main Building (i.e. 9 Bedford Row) was built in c.1717, as a residential townhouse by Robert Burford. The Mews House (i.e. 9 Jockey's Field) to its rear, is constructed from stock brick and features a tiled pitched roof.
- 3.3 The Building, which forms part of a series of 6 Georgian terraced properties originally comprised of 4 storeys (G+3) and basement and attic levels with 3 bays and spans 2 rooms deep to the rear of the façade.
- 3.4 The Building has undergone several alterations during its history, with the largest change being repair works and rebuilding due to bomb damage during World War II.
- 3.5 The existing Building comprises approximately 741 square metres of gross internal area within no. 9 Bedford Row (and modern rear link) with 226 square metres within 9 Jockey's Field.
- 3.6 The existing lawful use of the entire site is Use Class E (Commercial, Business and Service) as it was most recently used as offices. Its original use is clearly residential.
- 3.7 The Building is Grade II\* listed and located within the Bloomsbury Conservation Area. A large portion of buildings / spaces within this area are listed, including further terraced group listings on Bedford Row such as nos. 1-7 Bedford Row to the immediate south of the Site and nos. 33-36 Bedford Row to the west of the Site.
- 3.8 A full description of the existing Building is provided within the Design and Access Statement and the Heritage Statement.

## Surrounding Area

- 3.9 The surrounding area is predominantly characterised by a variety of uses, such as offices, residential, hotels, diplomatic and educational buildings, owing to its central London location. The surrounding area is most renowned for its history of its strong literary and publishing connections.
- 3.10 As set out above, the Site is located within the Bloomsbury Conservation Area which is characterised by its formally planned arrangement of streets enclosed by mainly three and four storey developments. The urban character of the broad streets is interspersed by formal squares which provide landscape dominated focal points to the area. Russell Square, Queen Square Gardens, Brunswick Square Gardens and Coram's Fields among many more, are located within close proximity to the Site.
- 3.11 The terraced houses extend both north and south of the Site, forming Bedford Row and Great James Street in continuation, and to the southwest along Sandland Street. To the north, Bedford Row is bound by Theobalds Road which is a busy thoroughfare running east-west and leads onto the areas of Clerkenwell and Farringdon.
- 3.12 The architecture of the surrounding area largely comprises typical Georgian buildings with the exception of Millman Place; a post-war development which extends into Millman Street via a second-floor pedestrian bridge.

- 3.13 To the north of the Site, beyond Great James Street, lies the Great Ormond Street Hospital, a world class leading children's hospital. The Charles Dickens Museum, on the site of the author's former home, is situated to the northeast of the Site.

#### *Heritage*

- 3.14 As aforementioned, the subject Building forms part of a group listing comprising *nos. 8-13 Bedford Row and attached railings. Number 11 incorporating the former number 10* (list entry ref. 1244602) which was Grade II\* listed October 1951, and the listing was most recently amended in January 1999.
- 3.15 The list entry ref. 1244602 is contained in full in the Heritage Statement.
- 3.16 The Townhouse has undergone various alterations and plan form reconfigurations, including an early 19<sup>th</sup> century refurbishment while in office use. Despite this, the Building still retains a fine panelled interior. The mews house at 9 Jockey's Fields to the rear of the Building originally comprised a stable on the ground floor with a single storey dwelling above. There is a non-original extension link internally connecting the mews house to 9 Bedford Row on the existing Site, and a former single storey link building is understood to have existed in 1887 as shown on the GOAD plan.
- 3.17 The mews house at 9 Jockey's Fields was demolished and a replacement building was constructed following planning permission and listed building consent granted in 1976. The mews house was further altered following the approval of an application in 1991, which saw the redevelopment of no.9 Jockey's Fields through the erection of a four-storey building to be in office use.
- 3.18 The immediate Site surroundings within the Bloomsbury Conservation Area contains a number of historic buildings and designated heritage assets. Bedford Row itself entirely comprises Georgian terraced townhouses of four storeys (G+3) which are also the predominant typology within the wider conservation area. The Site lies within the immediate vicinity (100 metres) of the following listed assets:
- Cast iron pump and 3 bollards opposite Brownlow Street on Bedford Row (Grade II);
  - Nos. 42 and 43 Bedford Row and attached railings (Grade II);
  - K6 Telephone kiosk outside no. 44 Bedford Row (no. 44 not included) (Grade II);
  - Gray's Inn Gardens railings on west side (Grade II);
  - No. 5 Field Court and attached railings (Grade II);
  - Nos. 33-36 Bedford Row and attached railings (Grade II);
  - Nos. 1-7 Bedford Row and attached railings and lamp holder (Grade II);
  - No. 14 Bedford Row and attached railings (Grade II);
  - Nos. 15 and 16 Bedford Row and attached railings (Grade II\*);
  - nos. 1-6 Raymond Buildings and attached railings (Grade II);
  - No. 17 Bedford Row and attached railings (Grade II);
  - Gateway and walls to north and west of Raymond Buildings, Raymond Buildings gateway and walls (Grade II);
  - Nos. 29-32 Bedford Row and attached railings (Grade II); and
  - Gray's Inn (Grade II\*).

#### **Accessibility**

- 3.19 The Site has a Public Transport Accessibility Level (PTAL) of 6b which is categorised as 'excellent', as it is located in close proximity to a variety of public transport routes.

- 3.20 The nearest London Underground Station is Holborn (Central and Piccadilly lines), located approximately 500 metres southwest of the Site, with Chancery Lane (Central line) situated approximately 400 metres southeast and Russell Square (Piccadilly line) located approximately 1km northwest of the Site (walking distances).
- 3.21 Being situated within north London, the Site is also located within close proximity to both London King's Cross and Euston, with all other national rail station in London accessible via excellent underground links.
- 3.22 The Site is highly accessible to London's bus network. The nearest bus stop is approximately 200 metres to the north of the Site at Holborn Police Station (with 4 routes operating). In addition, approximately 225 metres from Site is High Holborn Brownlow Street bus stop (with 4 routes operating).

### **Site and Planning History**

- 3.23 No. 9 Bedford Row was occupied as a residential townhouse since its construction in c.1717 until c.1858.
- 3.24 As noted in the Heritage Statement, in c.1839, John Thomas Church and his family moved into the Building as their family home and it was latterly used as an office for his business Church & Sons (solicitors). Following the death of JT Church in 1858, the family no longer resided at the Building and it was instead used as the Church & Sons office.
- 3.25 It has subsequently been in office use, largely legal firms due to the proximity to Gray's Inn and Lincoln's Inn, since the mid-19<sup>th</sup> century and was most recently occupied by 9 Bedford Row Barristers Chambers who vacated in March 2022.
- 3.26 Since the 19<sup>th</sup> century in particular, the Site has undergone several alterations and refurbishments, largely to facilitate the office use which has involved the introduction of inappropriate, unsympathetic and, at times, intrusive modern fabric. As aforementioned, the mews house at no.9 Jockey's Fields to the rear of the Building was entirely rebuilt in the 1990s and a modern link wing between both factors of the Site was added in c.1976.
- 3.27 According to the 1945 Bomb Damage map produced following World War II, the Site is shown to have been somewhat affected by bomb damage. The neighbouring no.10 Bedford Row suffered significant bomb damage which destroyed the building and is likely to have also disrupted the Site at no.9 Bedford Row by virtue of proximity.

### *Planning History*

- 3.28 A planning history search of LBCs planning register was undertaken, and the following applications are considered to be of relevance to the Proposals.
- 3.29 On 25<sup>th</sup> August 1981, consent was granted for alterations to the roof top plan / plan form and office accommodation (ref. N15/18/R/32128).
- 3.30 On 07<sup>th</sup> July 1988 listed building consent was granted for the demolition of 15-17 Jockey's Fields and alterations to 15-17 Bedford Row (ref. 8870070).
- 3.31 On 21<sup>st</sup> March 1991, planning permission and listed building consent was granted for refurbishment and alteration to No.9 Bedford Row demolition and redevelopment of No.9 Jockey's Fields by the erection of a four-storey building to be used for office purposes (refs. 9070167 and 9000263).
- 3.32 On 16<sup>th</sup> September 1994, planning permission and listed building consent was granted for alterations including the construction of a basement roof light, as shown on drawing numbers B23339/P2B SK10 and by letter dated 12<sup>th</sup> August 1994 (refs. 9470167 and 9400863).



- 3.33 On 16<sup>th</sup> January 1995, planning permission and listed building consent was granted for Partial demolition of rear party wall and installation of an internal timber staircase to provide a link between of 9 Bedford Row and 9 Jockey's Fields (refs. 9570012 and 9500067).
- 3.34 On 27<sup>th</sup> February 1998, planning permission was granted for the erection of a roof extension on the Site of 9 Bedford Row and 9 Jockey's Fields (ref. PS9705310R1).

# 4.0 DEVELOPMENT PROPOSALS

- 4.1 As set out in **Section 2** of this Statement, the Application seeks planning permission and listed building consent for the reconfiguration, internal refurbishment and external alterations and conversion of the existing listed building at 9 Bedford Row, back to single residential use.
- 4.2 The Proposal would involve:
- Removal and replacement of all non-original services, fittings, and joinery from the property;
  - Demolition of non-original link building creating a larger courtyard and separating the listed property from the non-original mews building;
  - Refurbishment of the main house (no.9 Bedford Row) interior with some minor alterations to the plan layout to reinstate the intended historic plan form including historic lightwells at basement level;
  - Refurbishment of the mews house to the rear (no.9 Jockey's Fields) interior with some alterations to the plan layout as part of its retention as Class E use; and
  - Conversion of 9 Bedford Row from Class E to Class C3.
- 4.3 Further details of the Proposed Development are set out within the plans and Design and Access Statement prepared by Quinn Architects which accompanies this submission.

## **Residential Town House**

- 4.4 The Proposed Development seeks to reinstate no. 9 Bedford Row as a self-contained residential townhouse. This involves the conversion of approximately 708.8 square metres from office use (Class E) to form a Class C3 dwelling, providing a historic plan form comprising a single-family home of approximately 708.8 square metres. The reduction in floor space is attributed to the removal of the ground floor modern link wing between the Building and the mews house to the rear.

## **Physical Alterations**

- 4.5 As set out above, the Proposals seek a number of internal and external alterations to the main dwelling and mews house.
- 4.6 The principal work includes the removal of inappropriate and intrusive office use features throughout the Site. This largely comprises the loss of modern and non-original fabric.
- 4.7 With regard to the mews house, it is proposed that the façade onto Jockey's Fields will be reconfigured to adopt a more historic elevation plan form comprising 3 symmetrical bays. The works will result in the loss of modern fabric to the existing façade of the mews house to create a more sympathetic façade which is in keeping with the surrounding character and setting of the heritage assets in the vicinity and enhance the special interest of the Site.
- 4.8 As a result of the refurbishment works, the Proposed Development would retain 226.4 square metres of commercial floorspace at 9 Jockey's Field.
- 4.9 The link wing between the two factors of the Site is proposed to be removed to improve the character of the Site and surroundings. The side wall will also be removed as part of this workstream, and the panelling would be removed and reinstated on the side wall.
- 4.10 Internally, there will be a minor loss of potentially historic fabric through the reconfiguration of a non-original door to a new location internally on the third floor. All other internal historic fabric is proposed to be retained.
- 4.11 The proposals seek to reconfigure the historic plan form of the Building to facilitate the transition back to being in residential use from office use.
- 4.12 A full description of the proposed internal works is set out within the Design and Access Statement.

## **Parking and Access**

- 4.13 The Proposed Development is 'car free' and would not provide any on-site car parking. Presently, Bedford Row holds car parking spaces for residential permit holders and no additional car parking is being created via this Application.
- 4.14 Cycle parking is not currently provided in the existing buildings, but will be provided as part of this Application. For the residential, bicycles are likely to be stored at basement level within a cupboard at the front of the property. Dedicated storage will also be provided within the entrance hall of the commercial use at 9 Jockey's Field.
- 4.15 The main access to the Site is via the front door on Bedford Row to the residential dwelling. There is separate access to the office use mews house from Jockey's Fields.

# 5.0 PLANNING POLICY FRAMEWORK

- 5.1 This Application has been informed by adopted and emerging development plan policies and other relevant guidance. This section of the Statement provides a summary of the relevant planning context, and Section 6 provides an assessment of the Application against the policies and guidance contained within these documents.

## Statutory Framework

- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise.

- 5.3 The Statutory Development Plan for the Site comprises the following:

- The London Plan (February 2021); and
- The London Borough of Camden Local Plan (July 2017).

- 5.4 The applicable statutory provisions in the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the 1990 Act') are Section 16(2), Section 66(1) and Section 72(1).

- 5.5 The proposals involve direct works to a listed building and require Listed Building Consent. Section 16(2) applies to Listed Building Consents and states that:

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

- 5.6 Section 66(1) applies to planning permissions, and states that:

*"In considering whether to grant planning permission [F1or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."*

- 5.7 Section 66(1) is relevant also because the proposals involve direct works to a listed building, as well as the potential setting impacts on listed buildings in the surrounding area.

- 5.8 Section 72(1) is relevant because the Site lies within The Mall Conservation Area and Castelnau Conservation Area. It states that:

*"In the exercise, with respect to any buildings or other land in a conservation area, of any [F1functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."*

- 5.9 The statutory provisions are supported by the policies at Chapter 16 of the National Planning Policy Framework (NPPF). The NPPF sets out general principles relating to the management of designated heritage assets at **Paragraph 193**, which outlines that:

*"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."*

- 5.10 Both statute and policy (see NPPF paragraphs 195 and 196) allow that a development may be consented for some other planning reason, on the balance of benefits. It is a matter of degree and relative weight on a case-by-case basis.
- 5.11 The ramifications of paragraph 193 extend to encompass any beneficial works and this is confirmed by the High Court in *Rottingdean (Safe Rottingdean Ltd v Brighton and Hove City Council EWHC 2632[86])*. Taking into account the considerable planning weight that attaches to any harm to a designated heritage asset, it follows that equal weight should be accorded to beneficial works.
- 5.12 This framework for the assessment of effects on heritage assets is discussed fully in the Heritage Statement submitted with the Applications.

### **Emerging Policy**

- 5.13 There is limited emerging policy in relation to the Site. The London Plan is up to date, but Camden is currently in the process of commencing a review of its Local Plan, with initial consultation being undertaken until January 2023. This is principally being undertaken to update policies to account for regional and national legislative and policy changes and the Council's declaration of a climate and ecological emergency. It currently holds no weight in determination of this Application.

### **National Guidance**

- 5.14 The revised National Planning Policy Framework (the "NPPF") was published in 2021 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements, as well as previous versions of the NPPF, first published in 2012. The NPPF sets out the Government's approach to planning matters and is a material consideration in the determination of planning Applications.
- 5.15 The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 11 states that decisions should apply a presumption in favour of sustainable development and goes on to state that:

*"For decision taking this means:*

*[...]*

- c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
  - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

- 5.16 In November 2016 (updated June 2021), the Government Published the Planning Practice Guidance (PPG) which is a material consideration in relation to planning applications. The PPG replaces a number of previous circulars and guidance to provide a simplified single source of guidance at the national level. The PPG is a material consideration in the determination of applications.

### **Regional Guidance**

- 5.17 LBC has adopted a number of guidance documents (Camden Planning Guidance / "CPG") which are material considerations in respect of the Application including:

- Access for All CPG (March 2019);
- Air Quality CPG (January 2021);
- Amenity CPG (January 2021);
- Basements CPG (January 2021);
- Biodiversity CPG (March 2018);
- Design CPG (January 2021);
- Developer Contribution CPG (March 2019);
- Employment Sites and Business Premises CPG (January 2021);
- Energy Efficiency and Adaptation CPG (January 2021);
- Housing CPG (January 2021); and
- Transport CPG (January 2021).

5.18 In addition to the above, the *Bloomsbury Conservation Area Appraisal Management Strategy* (April 2011) is a material consideration in the determination of this Application.

5.19 The remainder of this document identifies the key issues relevant to the determination of this Application and considers these in the context of relevant policy guidance.

5.20 The documents submitted as part of this Application also make reference to other technical guidance and legislation which is relevant to particular planning issues.

### **Site Specific Designations**

5.21 The Site is the subject of the following designations under the LBC Policies Map:

- Central London Area (i.e. Central Activities Zone);
- Archaeology Priority Area – London Suburbs;
- Blackheath Point to St. Paul's Cathedral LVMF Protected Viewing Corridor (6A.1);
- Primrose Hill summit to St. Paul's Cathedral LVMF Protected Viewing Corridor (4A.1);
- Greenwich Park Wolfe Statue to St. Paul's Cathedral LVMF Protected Viewing Corridor (5A.2); and
- Bloomsbury Conservation Area.

5.22 As noted previously, the Site forms part of the Grade II\* listed terrace.

## 6.0 PLANNING POLICY ASSESSMENT

6.1 Within this section, we assess the component parts of the Proposed Development against the statutory development plan and other material considerations as outlined in **Section 5**.

### Loss of Office Floorspace

6.2 The lawful use of the Site is office use which falls under Class E of the Use Class Order Amendment 2020. The Proposals which seek to convert the main house from office to residential use, has had regard to the relevant policies within the Camden Local Plan and the Employment Sites and Business Premises CPG (January 2021) and full consideration is set out within the supporting Loss of Employment Report.

6.3 Local Plan **Policy E2** (Employment premises and sites) states that the Council will protect sites that are suitable for continued business use, in particular premises for small businesses, businesses and services and those that support the functioning of the CAZ and local economy.

6.4 **Policy E2** notes that Camden will resist development of business premises for non-business use unless it is demonstrated that the building is no longer suitable for its existing business use and the possibility of retaining, reusing or redevelopment the site for similar or alternative business has been fully explored over an appropriate period of time.

6.5 The building is unable to fully meet the criteria set out within the policy as although the building is vacant it is not capable of being modernised to meet current standards.

6.6 The building was originally designed as a single-family dwelling house. As one would expect, the layout reflects the original use and is organised as a series of rooms off the hallway and stairs. As an office building, the fit out is tired and dated, and has not been refurbished for a considerable period of time, owing to the long occupancy of the previous tenants.

6.7 The physical plan form and constraints of the listed building would mean that it could not be upgraded to provide modern standards of office accommodation, without detriment to the special interest of the listed building. Whilst the office serves a certain purpose, the building has a number of main constraints including:

- Not fully accessible;
- Suffers from poor natural light to various parts;
- It has a very inefficient cellularised layout for office accommodation;
- Outdated and poor services;
- Poor energy efficiency;
- No flexibility on the layout for tenants – due to listed status; and
- No ability to create secure self-contained units with own toilets and kitchenettes within significant alteration, intervention, and refurbishment.

6.8 The '*Employment sites and business premises*' CPG provides further guidance on assessing proposals that involve a loss of a business use and the factors it will take into account.

6.9 The opportunity has arisen to convert this building back into its original use as a single-family dwelling house, as the property has been vacant and without a commercial tenant since March 2022.

6.10 In June 2021, the previous freeholders received an indication from the tenants that they were considering whether the premises was suitable for the future operation of their legal practices. As with many office occupiers, their business operation had been significantly affected by the COVID pandemic and the requirements for office users to adopt Government restrictions changed the working patterns, with the introduction of more home working.

6.11 This had caused the tenants to question whether the physical nature, size and age of the 9BR premises and its status as a listed building, were detrimental to the implementation of modern office practices and the future economically efficient operation of their business, especially with the introduction of modern "hybrid" working practices.

- 6.12 The need for a more modern, smaller office environment where all the occupiers could work more efficiently on one floor became a question which had been accelerated by the COVID situation and an upcoming opportunity to exercise a tenant's right to break the lease.
- 6.13 Accordingly, in September 2021, the tenants served notice and subsequently vacated the property.
- 6.14 At the time of writing, the Site has been vacant for 17 months (since March 2022), although the Site has been marketed for a period of 22 months (since October 2021) with a gradual vacating of the premises following a lease termination in the intervening period. A full summary of the marketing exercise undertaken during this period is set out within the accompanying Loss of Employment Statement.
- 6.15 The change of use would not therefore result in the displacement of an existing business.

#### The Office Market

- 6.16 The LBC Employment Land Study (2014) sets out that there are a number of different markets that operate within the borough, the Central London, Camden Town and outer Camden office markets and each have distinctive sub-markets which attract different types of operators. The markets have developed due to differing occupier requirements for premises which shape the areas they choose to operate.
- 6.17 The existing building does not meet the requirements of these three office markets. Whilst located close to Midtown, near to the Central London office market, its small size and poor quality means it is unlikely to attract corporate occupiers who are looking for high quality office space in Central London. Despite increases in rental levels in Midtown, corporate occupiers still wish to locate to central locations rather than relocating to cheaper accommodation in the north of the borough.
- 6.18 The Building suffers a poor office layout and lacks an open floorplan which is sought after by start-up and micro businesses. It is more likely that SMEs would find more suitable spaces in Camden Town or Kentish Town where there is a growing hub of business space.
- 6.19 Gale Priggen & Co were instructed to undertake a review of office space on the market within the London Borough of Camden. Their report is enclosed within the Loss of Employment Statement, as part of this Application.

#### Alternative Use as Residential

- 6.20 NPPF **Paragraph 123** sets out that local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular:

*"They should support proposals to use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres and would be compatible with other policies in this Framework."*

- 6.21 The principle of residential development in this location is set out in further detail below. Over the last 20 years, planning permission has been granted for the conversion of a large number of properties along Great Kings Street, Bedford Row and the wider Bloomsbury area, as these feature many similar period properties which are no longer suitable for modern office use. As tenants have the opportunity to review or end their leases, they are generally taking the opportunity, especially after the COVID pandemic to seek out accommodation that is better suited to their working practices and the modern working environment.
- 6.22 In considering developments affecting listed buildings, LBC must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 6.23 **Paragraph 192** of the NPPF sets out that in determining applications, the LPA should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.



- 6.24 The proposed development will return the main house to its original use as a single family dwelling and will have no adverse effect on the identified significance of the building. The Heritage Statement sets out that reinstatement would result in significant tangible as well as intuitive heritage benefits, resulting in substantial benefit to the architectural and historic interest of the Grade II\* listed buildings.
- 6.25 Benefits include; active conservation and restoration through repair and replacement of missing architectural features, such as panelling to ground and second floor level and appropriately styled doors throughout. The development would result in the restoration of the building's character and enjoyment as a family dwelling house.
- 6.26 Exceptional circumstances therefore exist when considering the loss of employment use under **Policy E2** as the residential use of the building would be in the interest of preserving and restoring the listed building to its original use. On balance, the heritage benefits of reusing the building and the associated sensitive physical improvements to the building provide the justification for the loss of employment floorspace.
- 6.27 The Mews House to the rear is proposed to be retained in commercial use, such that there would remain a commercial element of the Site. The Mews House provides a more attractive property for use as an office and it is intended to be occupied by the Applicant's family business.
- 6.28 This conversion would be entirely appropriate and would result in an enhancement to the significance of the listed building and conservation area as discussed in later in this section.

#### **Principle of Residential Development**

- 6.29 The Proposed Development accords with the current thrust of planning policy at national, regional and local level, which places an emphasis on achieving sustainable development. In particular, adopted plan policy is extremely clear that housing is a priority land use in Camden.
- 6.30 Housing delivery is a key objective of the NPPF and it advocates for sufficient amount and variety of land to come forward to significantly boost the supply of housing (**paragraph 60**).
- 6.31 **Paragraph 68** of the NPPF also requires local planning authorities to ensure planning policies identify a sufficient supply and mix of sites taking into account their availability, suitability and likely economic viability. There is a specific requirement for local planning authorities to maintain a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements, and developable sites or broad locations for growth for 6-15 years. An appropriate buffer should be included to ensure choice and competition in the market (**paragraph 74**).
- 6.32 **Paragraph 69** states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.
- 6.33 London Plan **Policy H1** (Increasing Housing Supply) states that the Mayor carried out a London-wide Strategic Housing Market Assessment (SHMA) which identified a need for 66,000 additional homes per year in London. London Plan (Table 4.1) identifies the housing target over a 10 year period from the date of publish for LBC to be 10,380 new homes, which equates to 1,038 new homes per annum.
- 6.34 London Plan **Policy H2** (Small Sites) states that small sites should play a much greater role in housing delivery and boroughs should pro-actively support well-designed new homes on small sites through planning decisions. This will:
- 1) significantly increase the contribution of small sites to meeting London's housing needs;
  - 2) diversify the sources, locations, type and mix of housing supply;
  - 3) support small and medium-sized housebuilders;
  - 4) support those wishing to bring forward custom, self-build and community led housing; and
  - 5) achieve the minimum targets for small sites set out in Table 4.2 as a component of the overall housing targets set out in Table 4.1.
- 6.35 Table 4.2 of the London Plan sets out a 10-year target of 3,280 for LBC, equating to 328 new homes within Camden on small sites per annum.

- 6.36 **Policy H1** states that self-contained housing is the priority land use of the Local Plan. The policy also states that LBC will resist alternative development of sites already identified through a current planning permission, unless it is shown that it is no longer developable for housing.
- 6.37 The principle of prioritising the delivery of housing over other uses and maximising that delivery has long been established as acceptable in Camden.
- 6.38 As noted above, the principle of residential on this Site has already been established through its original use. The property was built as a residential dwelling and converted to offices in the mid-19<sup>th</sup> century (c.1858) due to personal circumstances. While the Building has now been in office use for marginally longer than it has been used in residential use, the planning balance should recognise the heritage and housing benefits to be sought from converting it back into residential use.
- 6.39 The Proposed Development would result in the creation of a single additional residential dwelling, which forms a family dwelling on a 'small site'. Nevertheless, the provision of a townhouse on this Site fully accords with the aims of the development plan and would contribute to LBC meeting its targets for housing delivery. The siting of residential development in this location, close to other residential uses should be supported.

### **Affordable Housing**

- 6.40 **Paragraph 63** of the NPPF requires planning policies to specify the type of affordable housing required and set policies for meeting this need on site, unless off-site provision or an appropriate financial contribution in lieu can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities.
- 6.41 The provision of affordable housing should not be sought for residential developments that are not major developments, other than in rural areas, as required by NPPF **paragraph 64**.
- 6.42 **Policy H4** in the London Plan emphasises that the strategic target for affordable homes is 50% within London with specific measures to achieve this aim outlined below:
- a. *"Requiring major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach;*
  - b. *Using grant to increase affordable housing delivery beyond the level that would otherwise be provided;*
  - c. *All affordable housing providers deliver at least 50% affordable housing or 60% for strategic partners;*
  - d. *Public sector land delivering at least 50% affordable homes; and*
  - e. *Industrial land appropriate for residential use delivering at least 50% affordable housing if resulting in net loss of industrial capacity."*
- 6.43 **Policy H4** expresses the need for affordable housing to be provided on site with affordable housing only provided off-site or as a cash in lieu contribution in exceptional circumstance.
- 6.44 Local Plan **Policy H4** (Maximising the supply of affordable housing) seeks to provide 5,300 additional affordable homes from 2016 to 2031 and aims for an appropriate mix of affordable housing types. LBC expects a contribution to affordable housing from all developments that include housing and provide one or more additional homes.
- 6.45 The guideline mix, as set out in Policy H4 is 60% social-affordable rented housing and 40% intermediate housing and targets are based on an assessment of development capacity whereby 100 sqm (GIA) of housing is generally considered to create capacity for one home. The Policy identifies:
- *"a sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% of for each home added to capacity;*
  - *an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings; and*
  - *where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing;"*

- 6.46 The Proposed Development would provide a single residential unit within a listed building at 708.8 sqm (GIA), and therefore has a capacity for four homes based on the calculation set out in Local Plan **Policy H4**. A payment-in-lieu of affordable housing is therefore acceptable on this Site.

Payment in Lieu of Affordable Housing

- 6.47 Paragraph 3.108 of the Camden Local Plan sets out that Camden will:

*“...take into account any constraints on capacity where existing buildings are converted (particularly listed buildings and other heritage assets)...”*

- 6.48 This position is also set out at paragraph 4.33 of Camden’s Planning Guidance on Housing (January 2021), albeit with a slightly different wording:

*“In assessing capacity, the Council will take into account any constraints that might prevent the additional area from contributing to the number of homes in the scheme (e.g. [...] does it involve conversion of a Listed Building that cannot appropriately be subdivided?).”*

- 6.49 In this case, the Proposed Development has a capacity of four units when considering the amount of floorspace in isolation. However, this is a Grade II\* listed building which is a considerable constraint that affects the site capacity for delivering homes via a conversion.

- 6.50 Jon Lowe Heritage has commented on the principal of converting the building into flats and considered the impacts and harm associated with subdivision of the building. He notes:

*Returning the building to a single family dwelling is the optimal viable use in heritage terms. It imposes minimal need for alteration, no subdivision, and avoids the impacts associated with intensifying the use with multiple flats.*

*It would be feasible to divide the house into two units, one occupying lower ground floor and the other occupying the ground floor and above. This would require the staircase between the floors to remain in situ but sealed off. The lower ground floor would be accessible via the front area/lightwell and the upper unit via the front door.*

*It would not be feasible to divide the house into more than two units without causing harm. The hallway and staircase are a key part of its interest and would have to remain undivided on each landing. The installation of multiple kitchens and bathrooms, together with the greater service route provision and fire compartmentation would harm the fabric and plan form of the asset. As a Grade II\* listed building harm would need clear and convincing justification. Returning the asset to a single dwelling is a viable use that avoids the harm and offers an achievable heritage benefit.*

- 6.51 Therefore, the site capacity for this Application is considered to be a maximum of two units and the calculation of the payment in lieu towards affordable housing should be undertaken on this basis, in accordance with the Camden Planning Guidance on Housing.

**Housing Mix**

- 6.52 National planning policy contained within the NPPF requires a range of size, type and tenure of housing to address the need of different groups in the community, including affordable housing, families with children, older people and students. **Paragraph 73** seeks to ensure that the size and location of homes will support a sustainable community and ensure that a variety of homes are provided.

- 6.53 London Plan **Policy H10** (Housing size mix) states that schemes should generally consist of a range of units and requires a consideration of the appropriate mix based on a number of qualitative criteria. This includes the need to deliver a range of affordable homes, the nature and location of the site, the aim to optimise housing potential and the role of one- and two-bedroom units in freeing up family housing.

- 6.54 Local Plan **Policy H7** (Large and small homes) aims to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply.
- 6.55 All housing development should contribute to meeting the priorities set out in the Dwelling Size Priorities Table, which identifies a high priority for two and three bed market units. However, **Policy H7** also states that LBC will take a flexible approach to assessing the mix of dwelling sizes proposed in each development, having regard to a number of considerations.
- 6.56 The Proposed Development would provide a generous single-family dwelling, with family accommodation being a high priority with Camden. Whilst the Site cannot provide a mix of units, it does meet the aims of **Policy H7** with regard to providing a high priority housing unit. The property is therefore appropriate, given the building's current form and layout.

### **Design Principles**

- 6.57 High quality and inclusive design are encouraged at all policy levels. The NPPF notes that good design is a key aspect of sustainable development, and should contribute positively to making places better for people. Part 12 of the NPPF outlines the requirement for good design and sets out, at **Paragraph 130**, that development:
- (a) "will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
  - (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
  - (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
  - (d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
  - (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
  - (f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."*
- 6.58 London Plan **Policy D4** (Delivering Good Design) states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. Likewise, London Plan **Policy D5** (Inclusive Design) recognises the importance of developments achieving high standards of accessibility and inclusivity through design.
- 6.59 LBC's Local Plan **Policy D1** (Design) seeks to secure high quality design in development and requires development to:
- a) "respects local context and character;*
  - b) preserves or enhances the historic environment and heritage assets...;*
  - c) is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
  - d) is of sustainable and durable construction and adaptable to different activities and land uses;*
  - e) comprises details and materials that are of high quality and complement the local character;*
  - f) integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
  - g) is inclusive and accessible for all;*
  - h) promotes health;*
  - i) is secure and designed to minimise crime and antisocial behaviour;*
  - j) responds to natural features and preserves gardens and other open space;*

- k) *incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
- l) *incorporates outdoor amenity space;*
- m) *preserves significant and protected views;*
- n) *for housing, provides a high standard of accommodation; and*
- o) *carefully integrates building services equipment."*

6.60 LBC Local Plan **Policy C6** (Access for All) seeks to promote fair access and remove barriers that prevent everyone from accessing facilities and opportunities. The policy expects buildings and places to meet the highest practicable standards of accessible and inclusive design with fully accessible routes through buildings and facilities in the most accessible parts of buildings.

6.61 Due to the historic nature of the property and its Grade II\* listed status, it is not possible to adhere to Building Regulations with regard to access as step free access cannot be provided throughout the building.

6.62 A Design and Access Statement (DAS), prepared by Quinn Architects, is submitted as part of the Application. This document sets out in detail an evaluation of the Scheme's design and how it responds to the context of the existing building and surrounding area.

6.63 In accordance with policy requirements the proposals provide a sensitive design with alterations to the building that are appropriate in the context of its historic character and interest.

6.64 The design has been heavily informed by heritage considerations and the retention and reinstatement of the Building's special character and interest which is aligned with the parameters of good design as defined at all policy levels.

#### **Heritage Considerations**

6.65 The existing Building is Grade II\* and forms part of a group listing comprising the Georgian terraces at nos. 8-13 Bedford Row. The Site is also located within the Bloomsbury Conservation Area and owing to its central London location, the Site is within the proximity of a number of other listed buildings.

6.66 **Paragraph 194** of the NPPF states that:

*"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."*

6.67 NPPF **Paragraph 199** notes that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be.

6.68 Any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting should require, clear and convincing justification (NPPF Paragraph 200).

6.69 The Heritage Statement provides a full summary of the heritage policy and guidance.

6.70 London Plan **Policy HC1** (Heritage Conservation and Growth) states that development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

6.71 LBC Local Plan **Policy D2** (Heritage) outlines that the Council will preserve and, where appropriate, enhance the rich and diverse heritage assets and their settings, including conservation areas, listed building, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

6.72 In relation to designated heritage assets, **Policy D2** states:

*“The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- (a) the nature of the heritage asset prevents all reasonable uses of the site;*
- (b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- (c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- (d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

*The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.”*

6.73 In relation to conservation areas, **Policy D2** sets out that LBC will:

- (e) “require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- (f) resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- (g) resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
- (h) preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden’s architectural heritage.”*

6.74 In relation to listed buildings, **Policy D2** sets out that LBC will preserve and enhance these through:

- (i) “resist the total or substantial demolition of a listed building;*
- (j) resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and*
- (k) resist development that would cause harm to significance of a listed building through an effect on its setting.”*

6.75 A Heritage Statement, prepared by John Lowe Heritage, accompanies this Application and should be read in conjunction with this Planning Statement, the proposed drawings and the Design and Access Statement prepared by Quinn Architects.

6.76 The Heritage Statement assesses the Proposed Development on a scale from ‘neutral’ to ‘beneficial’ and concludes that there will be a predominantly beneficial impact on the Building through the Proposals

6.77 The Heritage Statement confirms that the property is an important early 18<sup>th</sup> century Georgian townhouse with a modern mews house to the rear (dating to 1990s). The main house’s historic domestic form is evident in its plan form, scale and architectural detailing but this has been eroded through physical changes as a result of many years of office use. This has resulted in unsympathetic, and at times intrusive, changes to the intended plan form and to the historic and architectural physical features. The opportunity has consequently arisen to enhance the Building through this Application in order to restore the historic plan form and remove uncharacteristic features through sensitive alterations and ultimately, return the Building to its former, and intended, use as a single family dwelling.

6.78 The Proposed Development which seeks to return the main house to its original use as a single-family dwelling will have no adverse effects on the identified significance of the Building. As aforementioned, reinstatement would result in significant tangible as well as intuitive heritage benefits, resulting in substantial benefit to the architectural and historic interest of the listed Grade II\* Building, in line with guidance and policy at all levels.

6.79 The appearance of the Building and the enhancement of the character area will be brought about through refurbishing the front and rear elevations of the main house with sensitive repair and restoration works to existing historic windows as well as refurbishment to the existing entrance and basement doors on the Bedford Row façade. It is proposed to remove the existing CCTV camera and replace the security alarm on the main façade which also undertake local repointing where necessary. The works seek to reinstate the character and special interest of the Building, both; for the Building itself and its contribution to the wider setting of the street and the conservation area.

- 6.80 The Heritage Statement concludes that *“the Proposed Development would see a scheme of refurbishment reinstatement of historic plan form, and removal of intrusive, uncharacteristic features with the aim of reintroducing long term domestic use. [...] Our assessment concludes that the proposals are sympathetic to the heritage asset and will enhance its overall more than special interest.”*

### **Residential Amenity**

- 6.81 Local Plan **Policy A1** (Managing the Impact of Development) seeks to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity.

- 6.82 **Policy A1** continues to state that LBC will:

- (e) *“seek to ensure that the amenity of communities, occupiers and neighbours is protected;*
- (f) *seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;*
- (g) *resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and*
- (h) *require mitigation measures where necessary.”*

- 6.83 *The factors we will consider include:*

- (i) *“visual privacy, outlook;*
- (j) *sunlight, daylight and overshadowing;*
- (k) *artificial lighting levels;*
- (l) *transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;*
- (m) *impacts of the construction phase, including the use of Construction Management Plans;*
- (n) *noise and vibration levels;*
- (o) *odour, fumes and dust;*
- (p) *microclimate;*
- (q) *contaminated land; and*
- (r) *impact upon water and wastewater infrastructure.”*

- 6.84 To support the above policy, LBC has produced extensive guidance within its Amenity CPG.

#### **Impact on Amenity**

- 6.85 Local Plan **Policy A1** is supported by the Camden CPG on Amenity which provides further guidance on the expectations that LBC has when considering the impact of schemes on daylight and sunlight levels. It notes that levels of reported daylight and sunlight will be considered flexibly taking into account site-specific circumstances and context.

- 6.86 The Proposed Development seeks to remove the later rear connection wing to create a clearer hierarchy between the original and host building, whilst giving prominence to the original brick vault at basement level. The Proposed Development is therefore reduced in size and impact on amenity, i.e. light or overlooking is not considered to be an issue in this case. Additionally, there would be no new windows overlooking adjacent properties.

- 6.87 The central courtyard is proposed to include a dividing boundary wall between the residential and commercial use, which will comprise a trellis clad with hit and miss timber. In addition, the rear windows of the mews building could be obscure glazed to limit any potential for overlooking and maintain privacy and amenity to the residential occupants.

#### **Construction Management Plans**

- 6.88 The supporting text to Local Plan **Policy A1** (paragraph 6.12) outlines that measures required to reduce the impact of demolition, excavation and construction works must be outlined within a Construction Management Plan (CMP).

- 6.89 In accordance with adopted plan policy and Camden Planning Guidance, the Construction Management Plan (CMP) Pro Forma has been drafted and submitted with this application by Motion.
- 6.90 This demonstrates how construction impacts will be minimised, in relation to site activity during works and the transport arrangements for vehicles servicing the Site.
- 6.91 We note that this draft Pro Forma would be progressed to a final version should planning permission be permitted. As is usual in Camden, this is likely to be the requirement of clause in the Section 106 legal agreement.

#### Conclusion

- 6.92 Overall, the Proposed Development has been designed to limit the impact on neighbouring residential (and other uses) amenity and ensure that future residents are afforded appropriate levels of amenity. The proposed alterations to the Building are minor, and would at least preserve the amenity currently enjoyed by nearby residents and occupiers. The aim of the project is to ensure that potential impacts from noise and odour are limited during construction. Furthermore, mitigation and management procedures can be put in place during construction and operation of the Building to ensure health and well-being in the local area is maintained.

#### **Transport**

- 6.93 Section 9 of the NPPF sets out the Government's policies with regard to transport. **Paragraph 110** sets out that development should ensure that:
- (a) *"appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
  - (b) *safe and suitable access to the site can be achieved for all users; and*
  - (c) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."*
- 6.94 The chapter concludes at **paragraph 113** that:
- "All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed."*
- 6.95 Chapter 10 of the London Plan provides the regional guidance for transport.
- 6.96 **Policy T1** (Strategic Approach to transport) outlines how development proposals should facilitate "the delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041". Additionally all development should make the most effective use of land, reflecting it's connectivity and accessibility by existing and future public transport, walking and cycling routes and ensure any impact is mitigated.
- 6.97 **Policy T2** (Healthy Streets) aims to improve London's health through delivering patterns of land use that facilitate residents making shorter and more regular trips by walking and cycling.
- 6.98 At the local level, **Local Plan Policy T1** (Prioritising walking, cycling and public transport) is the primary transport policy which promotes sustainable transport in the borough. The policy seeks to ensure that development is properly integrated with the transport network and supported by adequate walking, cycling and public transport links.
- 6.99 The Site is located within Central London and therefore has access to a number of key services, which are within walking distance of the Site. The Site has an excellent public transport accessibility (PTAL 6b), which ensures excellent links to the Underground, National Rail and bus services.
- 6.100 The Site is a highly accessible location with high public transport accessibility. The local area has minimal reliance on the private car. The Proposed Development would not provide any car parking.



- 6.101 The development would result in a negligible number of deliveries, which would be mainly contained to weekly food deliveries or parcels to the main house and mews house. This is not likely to result in a materially detrimental impact on the operation of the local highway network.
- 6.102 Overall, the Proposed Development is unlikely to result in a material effect on the highway network local to the Site and there are no highway or transport reasons why the development proposals should be resisted. Specific matters are addressed in further detail below.

#### Car Parking

- 6.103 The NPPF requires local authorities to consider parking provision within new developments based upon the accessibility of the development and the opportunities for public transport, and facilitate the provision of ultra-low emission vehicles.
- 6.104 **London Plan Policy T6** (Parking) outlines that the Mayor wishes to see car parking restricted in line with the levels of public transport accessibility and connectivity with a greater emphasis on car-free development. Whilst car-free development has no general parking, disabled persons parking should still be provided.
- 6.105 **Local Plan Policy T2** (Parking and car-free development) limits the availability of parking and requires all new development in the borough to be car-free. It is noted that the policy also supports the redevelopment of existing car parks for alternative uses. Car parking will be limited to spaces designated for disabled people where necessary and essential operating or servicing needs.
- 6.106 The Proposed Development does not provide any car parking spaces. As a result of its sustainable location and excellent accessibility to public transport and active travel modes, no additional car parking would be required. The development is therefore 'car free'. It is also appropriate in the context of its location, which is highly accessible and promotes the use of public transport, cycling and walking.

#### Cycle Parking

- 6.107 Both the NPPF and the London Plan promote cycling in locations which can be made sustainable.
- 6.108 London Plan **Policy T5** (cycling) outlines the Mayor's strategy to increase cycling within the capital. The policy outlines that development should contribute to the increase of cycling through the provision of cycle parking facilities and on site changing facilities. Furthermore, developments should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards.
- 6.109 **Policy T5** (cycling), table 10.2 outlines that for C3-C4 use class (all dwellings), long-stay cycle parking facilities would need to be provided within the development.
- 6.110 To promote cycling in the borough and ensure a safe and accessible environment for cyclists, LBC will seek to ensure that development:
- *provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan and design requirements outlined within CPG7: Transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development; and*
  - *makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers.*
- 6.111 The Proposed Development provides space for cycle parking within both buildings. This comprises a cycle storage cupboard in the basement for the residential use and area allocated for cycle parking within the ground floor of the mews house. The existing building does not currently provide any dedicated cycle storage so this represents an improvement to cycle parking.

## Sustainability

- 6.112 The NPPF supports the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourages the reuse of existing resources, including conversion of existing buildings, and encourages the use of renewable resources.
- 6.113 The London Plan sets out a number of core policies for major developments with regard to reducing carbon dioxide emissions and providing energy in a sustainable manner. The Proposed Development is a 'minor' scheme involving the conversion and refurbishment of a listed building to form a single residential unit.
- 6.114 London Plan **Policy SI 2** (Minimising Greenhouse Gas Emissions) states that development proposals should make the fullest contribution to minimising carbon dioxide emission in accordance with the 'be lean, be clean, be green and be seen' energy hierarchy. It seeks a 35% improvement in carbon reductions over 2013 Building Regulations for major developments with residential development advised to achieve 10%.
- 6.115 The London Plan contains a number of other adopted policies which are relevant to the sustainability of the development, including SI 4 (managing heat risk) and SI 7 (reducing waste and supporting the circular economy). Many of the GLA's policies are not suitable to be applied to minor developments.
- 6.116 At the local level, Camden Local Plan **Policy CC1** (Climate change mitigation) requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and operation.
- 6.117 LBC promotes zero carbon development in accordance with the London Plan, requiring all development to reduce carbon dioxide emissions through following the steps of the energy hierarchy.
- 6.118 Local Plan **Policy CC2** (Adapting to climate change) requires development to be resilient to climate change and adopt appropriate adaptation measure, although many of those outlined within the policy are not applicable to a scheme of this size.
- 6.119 **Policy CC2** also seeks to ensure that development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation. The policy expects domestic developments of 500 sqm of floorspace or above to achieve "excellent" in BREEAM domestic refurbishment.
- 6.120 This Planning Application includes an Energy & Sustainability Statement, prepared by Jaw Sustainability, which sets out the energy efficiency measures to reduce the energy demand of the Proposed Development, alongside carbon reductions and water efficiency strategies which have been incorporated into the design.
- 6.121 The building is exempt from Building Regulations Part L requirements due to its listed status. However, the Proposed Development has been designed with the aim of reducing operational energy and associated carbon emissions, whilst the embodied carbon content of materials will be minimised as far as possible.
- 6.122 The design follows the energy hierarchy, through seeking ways to reduce the need for energy and using energy more efficiently. However, the building is not capable of connecting to an existing low carbon heat network, and due to the nature of the building, the lack of space, and its Grade II listing, the viability of renewables is challenging and has been discounted.
- 6.123 These constraints limit the feasibility of utilising Low or Zero Carbon (LZC) technologies.
- 6.124 In addition, the energy hierarchy has been followed and, as such, there is no active cooling proposed.
- 6.125 The Proposed Development adopts a passive design would aim to minimise internal and external potable water usage and discourage the disposal of waste to landfill through good waste management during both operation and construction.
- 6.126 Overall, the sustainability strategy for this conversion stems from the use of more efficient services and maintenance such that it can be operated in an efficient way. High efficiency equipment and appliances will be installed throughout, although further use of technologies is challenging due to a number of limitations with the building.

## Waste and Recycling

- 6.127 Camden **Local Plan Policy CC5** (Waste) seeks to make Camden a low waste borough and aims to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031. The policy also seeks to make sure that developments include facilities for the storage and collection of waste and recycling.
- 6.128 Waste storage and recycling bins will be provided on Site. Refuse will be periodically taken out by occupants from the Building to the kerbside on the relevant collection date.

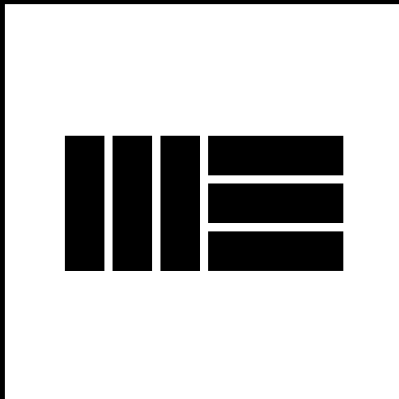
### **Community Infrastructure Levy**

- 6.129 As noted in **Paragraph 54** of the CPG, the Council may seek a contribution from developments, which result in the loss of more than 500 sqm GIA of employment floorspace, towards measures which create or promote opportunities for employment or training of local people.
- 6.130 The conversion of 9 Bedford Row results in the loss of 718.8 sqm (GIA) and therefore a planning obligation could be sought on the following calculation:
1. Employment Floorspace lost (sq m NIA) / space requirement per full time employee = full time jobs lost
  2. Full time jobs lost x 21% (Camden residents who work in Camden) x £3,995 = financial contribution.
- 6.131 Accordingly, for 9 Bedford Row, the loss of employment contribution would be as follows:
- Floorspace lost (GIA) – 718.8 sqm
  - Floorspace lost (NIA) – 479.4
  - Employee Space Requirement - 12sqm (NIA)
  - Jobs lost –  $479.4(\text{GIA})/12\text{sqm (NIA)} = 39.95$
  - Jobs lost x 21% = 8.3895
  - Training cost = £3,995
- 6.132 This results in a financial contribution of **£33,516**.
- 6.133 The loss of this employment floorspace would therefore contribute towards other measures that would create or promote opportunities for employment or training of local people in other parts of the Borough. This planning obligation would be secured via a Section 106 Agreement.

# 7.0 CONCLUSIONS

- 7.1 The Proposed Development to which this Statement relates, seeks the conversion and refurbishment of No. 9 Bedford Row as part of its change of use to a residential townhouse (Class C3) including associated physical alterations, and refurbishment of no. 9 Jockey's Fields (the mews house to the rear).
- 7.2 The Planning Statement has assessed the Proposals against the adopted Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act.
- 7.3 The Scheme has been formulated in accordance with the NPPF, the adopted London Plan and policies set out within the LBC Local Plan. It accords with the relevant policies of the adopted and emerging development plan, as well as being consistent with national planning policy.
- 7.4 Having regard to the assessment undertaken within this Statement, we consider the planning benefits arising from this scheme can be summarised as follows:
- Deliver sustainable development of a vacant, brownfield Site within Central London, in line with the overarching approach to development outlined in the NPPF;
  - Ensure that the Site is brought back into its optimum use, through the creation of a high-quality residential space which reinstates the historic plan form, removes unsympathetic and intrusive modern and non-original fabrics, and sensitive refurbishment of the existing features of special interest;
  - Deliver a design of high-quality architecture that would be congruous to the surrounding context, including preserving and enhancing the character and appearance of the conservation area and setting of listed buildings within the vicinity;
  - Result in an enhancement to the significance of the listed building by returning the building to its original use;
  - Deliver a high-quality design which promotes sustainability measures throughout its design, construction and lifetime of the Building; and
  - Contribute to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development with cycle parking provision which would promote other means of travel such as cycling and walking.
- 7.5 We note that the Proposed Development does not adhere to the full requirements of Policy E2, insofar that the loss of employment use is not supported by a full two-year period of marketing evidence. However, the Proposed Development must be considered in relation to its overall planning balance, and it is considered that the significant benefits delivered in heritage terms, of returning this listed building back into its original use would outweigh the minor loss of employment use, in this case. That loss would not displace any existing business and is a relatively poor quality office building in the context of the modern requirements of operators, and therefore has limited prospects of future occupation.
- 7.6 The proposed conversion of the building to a single-family house represents a significant enhancement to its special architectural and historic interest, which is also being sensitively refurbished.
- 7.7 In light of the above, we respectfully request that LBC grants planning permission and listed building consent for the Proposed Development.

**MONTAGU EVANS**  
**70 ST MARY AXE**  
**LONDON**  
**EC3A 8BE**



**WWW.MONTAGU-EVANS.CO.UK**

**London | Edinburgh | Glasgow | Manchester**

WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.  
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL