

22 August 2023

Regeneration and Planning
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall, Judd Street
London
WC1H 9JE

Via Planning Portal

Dear Sir/Madam,

**3-5 Bedford Row and 3-5 Jockey's Fields.
Amendments to Planning Permission ref. 2022/4158/P and Listed Building Consent ref. 2022/4750/L.**

On behalf of our client, FREP4 Bedford Row Limited (Frogmore), please find enclosed an application submitted under Section 73 of the Town and Country Planning Act 1990 (S73 application), and a linked application for Listed Building Consent.

The application submitted under S73 is:

"To vary condition 2 of Planning Permission ref. 2022/4518/P to allow design amendments including layout changes from basement to roof level, including a small infill extension to the courtyard at basement level with plant above, changes to the roof terrace at the third floor, and repositioned Bedford Row dry riser inlet together with amendments to the north, south and west elevations including the Jockey's Fields elevation."

Planning permission was originally granted on 9th May 2023 ref. 2022/4518/P, for the extension and alteration of 3-5 Bedford Row and 3-5 Jockey's Fields for office use. This submission should be read in the context of that original application and permission. In addition to this covering letter, the S73 application is accompanied by:

- Updated drawings. The approved drawings currently listed in condition 2 of planning permission ref. 2022/4518/P and which are to be superseded are set out at Appendix A.
- A design report describing the proposed changes in detail.
- A heritage update which concludes that the changes will have no impact on the previous conclusions that the scheme will preserve and, in many respects, enhance the special architectural and historic interest of the listed building, and the character and appearance of the Bloomsbury Conservation Area.
- Minor updates to the following technical documents:
 - Daylight and Sunlight.
 - Ventilation.
 - Acoustic.
 - Structural.

The application for Listed Building Consent is for:

"Extensions and alterations of 3 - 5 Bedford Row and 3 - 5 Jockey's Fields to create additional commercial space (Class E), including erection of a setback fourth floor roof extension to the Bedford Row buildings, erection of a 3rd floor mansard roof extension

and remodelled 2nd floor to the Jockey Fields buildings plus associated fenestration changes to its ground and first floors, reconstruction of the intervening link structure with increased basement level footprint, two additional floors plus roof terrace above and rear closet wing extensions, plus internal alterations and refurbishment, green roofs, cycle parking, waste/recycling storage, plant and other associated works. Amendment to the scheme approved under Listed Building Consent ref. 2022/4750/L to allow design amendments including layout changes from basement to roof level, including a small infill extension to the courtyard at basement level with plant above, changes to the roof terrace at the third floor, and repositioned Bedford Row dry riser inlet together with amendments to the north, south and west elevations including the Jockey's Fields elevation."

The content of this application is as previously approved through Listed Building Consent ref. 2022/4750/L, other than to include the same amendments as being proposed through the S73 application. In addition to this covering letter, the application for Listed Building Consent is accompanied by:

- A full set of existing, demolition and updated proposed drawings.
- The same design report, heritage update and structural note as submitted with the S73 application.

1. Background

Frogmore is the freehold owner of the office building, having acquired the site in 2022. Planning Permission and Listed Building Consent for its extension and alteration were granted in May 2023. The fundamental aim of the development is to improve the quality of the office accommodation, to bring the vacant heritage asset back into use as an office and to ensure that it is conserved, and its significance is preserved.

As often happens, some modest amendments have arisen during the detailed design process prior to the construction of the scheme. The changes presented within this application have already been subject to supportive, pre-application feedback from Officers.

2. The Proposed Amendments

The proposed changes principally comprise:

- The internal layouts have been developed since May including streamlining the cores to give more efficient office floorplates and following extensive workshops with Approved Inspector and Fire Engineer.
- A small infill extension within the south courtyard at basement level is now proposed. The approved courtyard at basement level was sandwiched between the edge of the building and new plant installations, and it is now considered better to internalize some of the space. A smaller lightwell will remain to bring daylight down. The plant that was at basement level in the courtyard is now shown on the flat roof at ground floor level. The total area of the scheme will increase by 30sqm GIA.
- The landscape on the third-floor roof terrace being created to the centre of the site has been adjusted, to reflect a detailed scheme that sits underneath the architectural plans approved within the consent.
- Repositioning of the Bedford Row dry riser inlet.
- The elevations have been adjusted. The modifications include a slight change to the elevation fronting Jockey's Fields, which following feedback from Officers, is limited to only a small increase in the separation between windows at ground floor level. Following recent site- investigation it has become apparent that there are structural columns which need to be retained and which require the separation of the windows. The fenestration to the new build closet wings has also been slightly amended to ensure adequate door clearances for fire escape and plant access.

3. Planning Policy Context

The S73 application should be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this case, the Development Plan comprises the approved London Plan 2021 and adopted Camden Local Plan 2017. This was the case when the original application was determined, and the policies and designations of the Development Plan are therefore unchanged.

There has also been no change to the material considerations, comprising the National Planning Policy Framework updated in 2021, together with the Bloomsbury Conservation Area Appraisal and Management Strategy 2011, Housing CPG (2021), Design CPG (2021), Energy Efficiency and Adaptation CPG (2021) and the Employment Sites and Business Premises CPG (2021).

The planning policy context is interlinked with a statutory requirement under the Planning (Listed Buildings and Conservation Areas) Act 1990 that the desirability of preserving features of special architectural or historic interest be considered in assessing an application for Listed Building Consent.

4. Planning Assessment

The interior fabric and finishes of the building are of no architectural or historic interest and do not contribute to the site's significance. The Council's pre-application advice stated that the changes to the cores will be supported.

The small infill extension within the courtyard at basement level will only conceal an existing doorway into the Bedford Row part of the building and ventilation ducts, behind which is currently a plant room. Pre-application advice from the Council stated that this change will be considered acceptable in terms of the effects on the listed building, as there is no original fabric or plan form that will be harmed. It will also not be publicly visible and therefore will have no impact on the Conservation Area.

The basement courtyard infill will make no difference to the ventilation strategy of the scheme. The basement was, and will continue to be, mechanically ventilated on a day-to-day level. Purge ventilation (that is, if there was a need for any rapid ventilation) will be through the windows of the front elevation, as was to be the case in the approved scheme. This fire strategy has been approved by both Building Control and the fire brigade.

The Daylight and Sunlight update submitted with this application concludes that the lighting conditions within the basement will remain the same. Overall, the light position will be no different from that approved and will still promote good working conditions.

The Acoustic update confirms that the movement of plant from the courtyard to the roof of the basement infill will have no noise impact.

The Applicant will accept a Deed of Variation to the signed Section 106 Agreement to secure an increase in the affordable housing financial contributions due to the floorspace increase of 30sqm GIA.

The adjustment to the landscaping on the third-floor roof terrace will not alter the extent of the green roof, nor be publicly visible.

The changes to the scheme's elevations will be minor. Officers stated in their pre-application advice that the revision showing three windows at ground floor in the central section of the Jockey's Fields elevation separated by columns rather than as a continuous strip, will not be opposed.

5. Conclusion

For the reasons set out above, both the S73 application and application for Listed Building Consent should be considered acceptable.

Should you require any further information, please do not hesitate to contact Nick Delaney or Nadia Shojaie of this firm.

Yours faithfully,



Daniel Watney LLP

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Appendix A: List of Substitute Drawings

Approved Plans under 2022/4518/P:	Proposed Plans to be Substituted under Section 73:
Proposed Basement Plan P0009 Rev D	Proposed Basement Plan P0009 Rev F
Proposed Ground Floor Plan P0010 Rev D	Proposed Ground Floor Plan P0010 Rev G
Proposed First Floor Plan P0011 Rev D	Proposed First Floor Plan P0011 Rev F
Proposed Second Floor Plan P0012 Rev D	Proposed Second Floor Plan P0012 Rev F
Proposed Third Floor Plan P0013 Rev D	Proposed Third Floor Plan P0013 Rev G
Proposed Fourth Floor Plan P0014 Rev D	Proposed Fourth Floor Plan P0014 Rev G
Proposed Roof P0015 Rev D	Proposed Roof P0015 Rev G
Proposed East Elevation (Jockey's Fields) P0032 Rev E	Proposed East Elevation (Jockey's Fields) P0032 Rev J
Proposed South Elevation P0033 Rev A	Proposed South Elevation P0033 Rev C
Proposed North Elevation P0034 Rev A	Proposed North Elevation P0034 Rev C
Proposed West Elevation (Jockey's Fields) P0035 Rev B	Proposed West Elevation (Jockey's Fields) P0035 Rev D
Section 02 P0042 Rev C	Section 02 P0042 Rev E

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